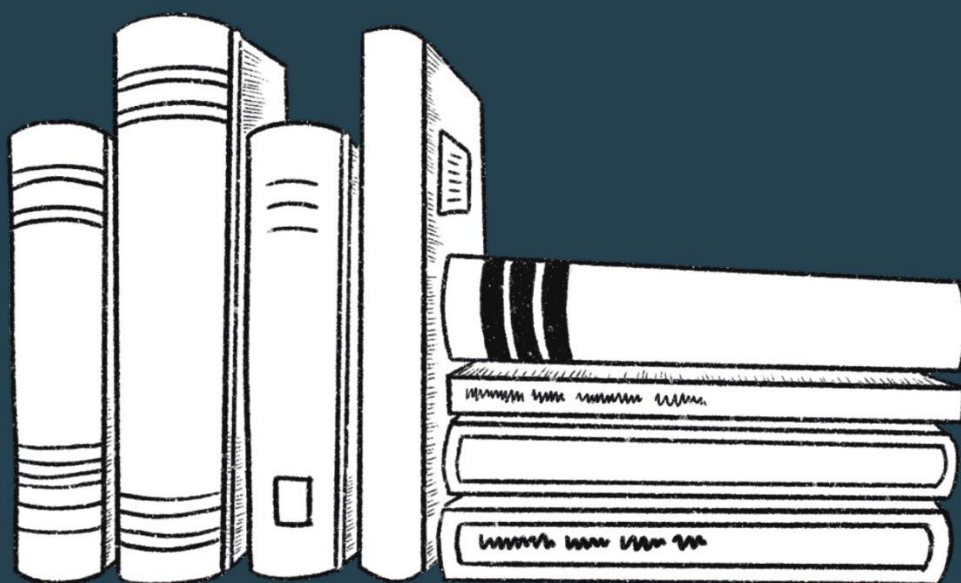


# Higher Education Quality Council of Ontario



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## **Understanding the Regulatory Landscape of Private Career Colleges**

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## Introduction

Private career colleges (PCCs) exist as a sizeable but understudied part of Canada's postsecondary education (PSE) landscape by training graduates in specific skills suited to the labour market. This report provides an overview of the regulatory environment of PCCs in Ontario and across the country to fill the gap in publicly available research.

Ontario's *Career Colleges Act, 2005* defines a career college as an "educational institution or other institution, agency or entity that provides one or more vocational programs to students for a fee and pursuant to individual contracts with the students." As such, Ontario career colleges primarily offer short programs focused on market-relevant career and vocational training rather than broad or transferable skills (Milian & Hicks, 2014).

The total number of PCCs<sup>1</sup> in the country is in constant flux (Milian & Hicks, 2014). According to 2023 data from the Canadian Information Centre for International Credentials (CICIC, 2023), there were over 1,500 registered PCCs in Canada and over half (780<sup>2</sup>) were in Ontario. PCCs range from small 'mom-and-pop' operations to large shareholder chains (Milian, 2018). These institutions generate revenue from tuition fees but also, in some cases, from government funding through different programs and subsidies, such as Better Jobs Ontario, which provides funding for skills training to those who are unemployed (Côté & White, 2020).

PCCs may admit students on a continual intake basis, rather than through semester cycles, and have a faster completion time than other postsecondary programs. These institutions have traditionally attracted students who are not well-served by other postsecondary institutions, including students from lower socioeconomic backgrounds and newcomers who seek credentials from PCCs to help them transition to local labour markets (Li & Jones, 2015). In recent years, international students made up a significant proportion of PCC enrolments (Office of the Auditor General of Ontario, 2021). In light of recent changes announced by Immigration and Refugees Canada (IRC) with respect to student visas and work permits, these international enrolments are likely to drop precipitously.

## The Changing PCC Landscape

Recent shifts in policy since we began compiling this report will have a dramatic effect on PCCs in the international space. In January 2024, the federal government announced an effective two-year cap on student study permit applications to an annual maximum of 360,000 nationwide. In response to the federal cap,<sup>3</sup> on March 27, 2024, Ontario announced that 96% of its provincial allocation of student study permits would be assigned to publicly assisted colleges and universities; 4% to language schools and other private institutions; and none to career colleges.

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<sup>1</sup> Nomenclature for these institutions varies by province. For the purposes of this report, we use the term "private career colleges" (PCCs) throughout to refer to the broad group of institutions. We use province-specific naming where relevant.

<sup>2</sup> According to policy experts, while CICIC reports campuses separately based on information provided by the province, the Ministry counts PCCs with multiple campuses as a single entity. Ontario registers each career college to operate at one or more locations. Additional locations require separate approval under the same registration. The total number of PCCs (i.e., registered entities) in Ontario in September 2023 was 576. This number does not include unregistered PCCs, which are not registered because of registration criterion such as size and revenue. If all the campuses of each registered PCC are counted separately, the total number of PCCs is 780. For instance, triOS College has 8 campuses within Ontario. This is the reason why there may be discrepancies in the figures. The number of PCCs was collected via a search of the CICIC website on December 14, 2023.

<sup>3</sup> The Federal Government's new cap on study permit applications will result in a decrease of 35% from the previous year. Under this cap, each province and territory will receive a portion of the intake cap, weighted by population.

Ontario, like all provinces and territories, will be able to control the allocation of international students by institution because it must now, under federal policy requirements, issue an attestation letter supporting a student visa request.

Despite the policy shift, it remains important to understand the PCC landscape. There is a lack of detailed and current research on how career colleges in Ontario are established, governed and regulated to meet provincial goals (Li & Jones, 2015; Milian & Hicks, 2014). The pause in admission of new international students provides a unique space for bettering our understanding of the regulatory environment.<sup>4</sup>

## Research Questions and Methodology

This report is guided by two questions: How are career colleges established and regulated in Ontario? And how does this compare to other provinces and territories in Canada? We begin with a foundational scan of PCCs in Ontario and across the country. This is followed by a survey of Ontario's specific regulatory context, including the registration and renewal of registration processes, quality assurance (QA) mechanisms for the approval of programs, regulations for hiring instructors and eligibility for Designated Learning Institute status. Finally, we outline the student support services provided by PCCs.

Publicly available legislation and provincial regulations were used as primary sources for our policy analyses. Other sources of information included grey literature published on the PCC sector in Canada and websites for the Canadian Information Centre for International Credentials (CICIC) and the National Association of Career Colleges (NACC). Further data were obtained through interviews with senior Ministry of Colleges and Universities (MCU) officials responsible for the regulation of PCCs in different provinces, including Ontario. These data were collected under protocols approved by the Research Ethics Board of the University of Toronto and involved 45–60-minute interviews focusing on a detailed review of provincial processes and practices. The initial draft of the data report (Appendix A) was later shared with the interviewees to ensure the accuracy of our analysis.

## Data Presentation and Analysis

Our findings are divided into four sections:

- 1) a foundational scan of PCCs in Canada;
- 2) a description of the registration and renewal processes of career colleges in Ontario, as well as the QA mechanisms for the approval of programs and hiring of instructors;
- 3) an overview of the Designated Learning Institution (DLI) processes for Ontario career colleges; and
- 4) an exploration of student services and supports at PCCs.

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<sup>4</sup> A very small number of private providers played a significant role in Ontario's public college sector through Public College–Private Partnerships (PCPPs), however a discussion of PCPPs is beyond the scope of this report. An overview of PCPPs can be found in **Appendix A**.

## 1) PCCs in Canada

PCCs are defined as private and vocationally oriented colleges that offer career-focused training through non-degree-level private education (Li & Jones, 2015).<sup>5</sup> They are regulated at the provincial level by specific acts, which vary in language for describing such institutions. For instance, in Ontario, these institutions are called career colleges; in Alberta (AB), New Brunswick (NB) and Nova Scotia (NS), they are called PCCs; in British Columbia (BC), Newfoundland and Labrador (NL), the Northwest Territories (NWT) and Yukon (YT), they are called private training institutions; in Manitoba (MB), they are private vocational institutions; in Prince Edward Island (PEI), they are private training schools; in Quebec (QC), they are private, non-subsidized institutions; and in Saskatchewan (SK), they are private vocational schools.

According to the CICIC as last accessed on December 14, 2023, Ontario has 780 career colleges of which 291 are Designated Learning Institutions (DLIs): a federally designated status that allows them to recruit and enrol international students. Ontario has the highest number of career colleges in the country, with twice the number as BC, the province with the second-highest number. Not surprisingly, Ontario also has the highest number of DLI colleges and universities in the country, which includes all public and private higher education institutions that are eligible to recruit international students. In contrast, NB, NL, NS, PEI and SK have fewer than 50 PCCs each. Saskatchewan has only five private vocational schools recognized as DLIs; collectively, they enrol a handful of international students each year. **Table 2 in Appendix B** provides a breakdown of acts, provincial bodies tasked with oversight and the number of PCCs and DLIs by province.

The *Career Colleges Act, 2005* regulates career colleges in Ontario. The superintendent of career colleges ensures that career colleges comply with the Act. The Act provides a regulatory framework in which institutions focus on two requirements: a) to seek registration as a career college; and b) to seek program approval from the superintendent of career colleges. The superintendent is a civil servant responsible for determining eligibility for registrations, and exercises authority exerting positional power to revoke or suspend the registration of a career college for serious non-compliance with the Act (Milian & Hicks, 2014). The Act states that every career college in Ontario must secure the approval of the superintendent for any vocational program that require 40 or more hours of instruction and charge tuition of more than \$2,000.<sup>6</sup>

Having a minimum criteria or base for registering as a private college is common across provinces, though those criteria vary. For example, MB, BC<sup>7</sup> and PEI are aligned with Ontario and require both minimum tuition fees and instruction hours. Some provinces, including NB, NL and YK, define a minimum number of hours only (21, 50 and 45, respectively) and do not set

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<sup>5</sup> While private institutions, some Ontario colleges benefit indirectly from government subsidies through student loan programs (such as Better Jobs Ontario and OSAP/CLSP).

<sup>6</sup> Tuition thresholds for regulation are higher in Ontario and BC compared to other provinces (and both provinces have higher numbers of PCCs across Canada).

<sup>7</sup> Private vocational institutions in MB are required to register with the Private Vocational Institutions Branch if they offer at least one vocational program with a minimum 40 hours of instruction and a minimum of \$400 in total costs. BC goes a step further in also specifying the types of programs: an institution that provides at least one (career-related) program with 40 hours or more of instruction time and tuition of at least \$4,000 requires a registration certificate. These are Class A programs. Institutions that do not offer Class A programs may apply for designation if they offer a Class B or Class C program. Class B programs are career-related programs other than Class A programs at designated/interim-designated institutions for which the tuition fee is less than \$1,000; and Class C programs are language programs (with a learning objective for students to gain or improve proficiency in a language) at designated/interim-designated institutions that are longer than six months, or for which the tuition fees are at least \$4,000.

minimum tuition rates. Quebec states that private, non-subsidized colleges require programs with a minimum of 45 periods of instruction to be eligible for a permit. Alberta requires the licensing of career training programs that cost more than \$1,000 but does not specify minimum instructional hours. See **Table 3 in Appendix B** for a summary of minimum tuition fees and hours of instruction by province and territory.

Institutions that do not meet these thresholds for tuition fees and/or hours are not eligible to register as PCCs and are not governed by provincial acts. In Ontario, some educational providers operate outside the Act because their programs are considered non-vocational, such as coaching and natural healing; other programs (including health diagnosing, dental hygiene, hairstyling and truck driving) fall under the jurisdiction of other ministries or regulatory colleges. Others are ineligible because of the nature of the institution itself, including those that deliver single-skill-training courses, corporate and third-party training, religious training courses, and courses protected by other legislations. Occupational and institutional exemptions are also common in other provinces where programs fall outside the jurisdiction of PCCs and are regulated by other bodies, such as religious occupations in MB and private institution training in SK and NL.

## 2) The Registration Process in Ontario

Registration processes are defined under provincial acts. In Ontario, the *Career Colleges Act, 2005* defines the registration processes and accountability checks for applicants. Checks include proof of insurance, background checks of operators,<sup>8</sup> operator profiles, program registration, program evaluations, third-party submissions if the program is for a regulated vocation (e.g., paralegal) and provincial instructor requirements. All career colleges must obtain the approval of their facilities through fire, health and building inspections and have an on-site visit from an MCU official. First-time applicants must provide MCU with a financial surety of at least \$10,000 or 10%, whichever is greater, (or 10–20% of the forecasted gross annual vocational revenue) in the first year of operation.<sup>9</sup>

To process registrations, Ontario uses a portal called the Program Approval and Registration Information System (PARIS).<sup>10</sup> Career college operators must submit pre-screening applications, and their profiles and proof of financial security are reviewed at the time of

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<sup>8</sup> The Act requires the superintendent to be satisfied that past conduct of the applicant signals integrity and honesty, and that the applicant does not indulge in activities contravening the Act or regulations, will operate in compliance with the Act and remain financially responsible.

<sup>9</sup> In NS, the surety must be at least \$10,000 but no more than \$75,000. But for most other provinces, the surety amount is much higher. For example, applicants in NL need to furnish a minimum of \$50,000 and up to a maximum of \$150,000 at the time of application. An operator in PEI is required to obtain and maintain liability coverage for the private training school in the amount of at least \$2,000,000. Applicants in NB and AB must provide financial security, which could be in the form of a surety bond or an irrevocable letter of credit, for the first two years of operation.

<sup>10</sup> BC uses the private training institutions portal for re-certification, access to all program information listed with the Private Training Institutions Branch for the institution, viewing outstanding invoices and uploading documents. BC has a commissioner appointed by the Lieutenant Governor in Council for a term for up to five years with the option of reappointment. Other provinces, such as AB and SK, also require operators to submit information about any legal claims pending against them, prior experience of running PCCs, past ownership, history of bankruptcy, criminal convictions and character references. Permits in QC may also be issued on the condition that the operator/CEO has not pleaded guilty or been convicted in the three years preceding the application. Permits in QC may also be refused if the shareholder of the private institution has a judicial record (i.e., a conviction for a criminal or a penal offence in Canada or elsewhere unless a pardon has been obtained) relevant to the abilities and conduct required to operate an educational institution. Individual applicants in PEI additionally require character references from two reputable people in the province at the time of application. In NL, private training institutions and their directors, officers, partners or owners must not have any prior known convictions for violations of federal or provincial legislation governing ethical recruitment or advertising or convictions under the *Criminal Code of Canada* for fraud related to such activity.



application. A registration unit at MCU reviews applications for registration and program approval while a separate MCU unit reviews financial components. If all requirements are met and “it is in the public interest to grant the registration,” Ontario’s superintendent will register the college (*Career Colleges Act, 2005*, IV, 14(1)). MCU’s aim is to determine that the career college will operate with integrity and honesty, in accordance with law and in a financially responsible way that promotes public interest. Other provinces require similar information from applicants at the time of registration.

## Program Assessment and Approval

Program offerings require approval from the superintendent. Ontario uses a program standard for some program offerings, which provides an overview of the minimum knowledge and skills that graduates are expected to attain according to particular areas of study, including applied arts, business, health services, human services, hospitality and technology. Program standards are updated regularly in collaboration with colleges, employers, graduates and industry groups (MCU, 2023b). Once a program has been deemed vocational<sup>11</sup> following a pre-screening process, applicants must submit a description of the subject and modules, learning sequence, methods of evaluation and instructor qualifications.

Programs typically require assessments from two reviewers,<sup>12</sup> guidelines for the selection of which are specified by the superintendent pursuant to the Act. The first assessment must be from a subject matter expert, who has at least five years’ experience (acquired within the preceding ten years) in the program discipline and has been approved by the superintendent (MCU, 2022c). The second must be from an adult education expert with a degree in education or at least 10 years of experience, whose primary responsibility is adult program development and design. Both assessors must be enlisted by the career college as part of the process of seeking approval, and MCU determines whether the assessors meet the criteria. Third-party submissions from regulatory agencies and/or accrediting bodies are also typically required for programs in regulated occupations.

Ontario also requires a labour market needs assessment as part of the program approval process. Career colleges must provide evidence to MCU that the program will translate to employment opportunities in the region. Career colleges rely on market forces, as they operate in a competitive environment and are designed to provide quick entry to the labour market.

Other Canadian provinces and territories also require subject matter experts and industry input for curriculum development, program design and program reviews. In AB, for example, PCCs must demonstrate satisfactory evidence of labour market demand for qualified individuals in the relevant field through employment forecasts, current job postings (full and part time), examples of detailed job postings and estimated time for graduates to find work. Manitoba requires employer attestation references and instructor declarations. Private training institutions in NWT must provide a labour market needs assessment, evidence that the curriculum is industry relevant and evidence that there is no duplication with similar programs in the territory. See

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<sup>11</sup> A program is vocational if it provides the skills and knowledge necessary to enter a “prescribed” vocation, meets or exceeds the thresholds regarding cost and duration and does not satisfy any of the exemption criteria.

<sup>12</sup> In cases where programs are subject to a third-party regulatory body, one reviewer will suffice.

**Table 4 in Appendix B** for a summary of QA standards for programs in career colleges across Canadian provinces and territories.

### Minimum Requirements for Instructors

To satisfy the requirements for teaching at career colleges in Ontario, instructors must meet one of two possible sets of criteria. The first is a minimum of 48 months of work or teaching experience (or a combination of both) in the relevant vocation in the past 10 years. The other is a minimum of 24 months of working or teaching experience in the past 10 years and one of the following qualifications: an Ontario bachelor's degree or an equivalent degree from outside Ontario; a certificate of qualification issued under the Ontario *Building Opportunities in the Skilled Trades Act, 2021* or equivalent Canadian certificate; or status as a graduate of an Ontario CAAT, registered career college or equivalent institution outside Ontario.

Minimum instructor qualifications (involving prior industry experience and requisite certifications) are outlined by most Canadian provinces and territories; however, some provinces mandate the registration of specific instructors at the time of registering the PCC. For example, NB requires PCCs to register all instructors and any agents, salespersons or representatives of the PCC with their registration or renewal; in NS, PCCs must list authorized instructors and instructor assistants with their application; SK and PEI require that instructors are registered with their respective ministries; and in NWT, before issuing or renewing the certificate, the government director must be satisfied that the qualifications required for instructors are recognized by the applicable industry. Some provinces, such as SK, YT and Ontario, require additional certification such as journeyman certification or Red Seal in the applicable trade.

See **Table 5 in Appendix B** for a summary of qualifications, prior industry experience and additional certifications necessary for instructors to demonstrate by province.

### Registration Renewal Process

PCCs in Canada must renew their registration on an annual basis, except for in QC, where renewals happen every three years, and in BC, where the certificate expires seven months after the end of the college's fiscal year. Once acquired, certificates are mandated to be placed at visible locations on campus.

Ontario career colleges are required to maintain standards and report periodically on key performance indicators (KPIs) as determined by MCU. As mandated by the Act, Ontario career colleges must report on six KPIs established by the superintendent: graduation rate, graduate employment rate, graduate employment rate in the field of study, graduate satisfaction, employer satisfaction and OSAP default rate.<sup>13</sup>

In Ontario, KPIs are publicly available and may provide information for prospective students. In AB, NS and NWT, specific KPIs must also be met. Saskatchewan updated their regulations in 2022, revising their KPIs in an effort to strengthen the use of metrics in the regulation of the sector.

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<sup>13</sup> KPIs are publicly reported through the Ministry of Colleges and Universities. At the writing of this report, the most recent data is from 2021.

Compliance inspections are used to ensure that a registrant operates according to the Act. These inspections, grounded in a risk-based framework, are not usually scheduled and are carried out at least once over a two- to three-year cycle. Compliance notices and enforcement actions are listed on the career college's website. Some non-compliance issues include providing false or misleading information, providing a program completion certificate to a student the institution did not train or providing unapproved vocational programs. Generally, if a career college is compliant with the Act and there have not been any complaints, the inspections take place every two to three years. Other provinces, such as MB and NL, have annual inspections as a part of their compliance with regulations.

See **Table 6 in Appendix B** for requirements for the maintenance of PCC status across all provinces and territories.

### 3) Designated Learning Institution (DLI) Status and PCCs

International students seeking admission to an educational institution in Canada to pursue a program of study that is 6 months or longer<sup>14</sup> can obtain a student visa *only* if they are admitted to a DLI (i.e., *only* DLIs can enrol international students for programs 6 months in duration or longer). While student visas are issued directly by Immigration, Refugees and Citizenship Canada (IRCC), the federal government relies on the DLIs to verify that the student has been accepted for admission.

Canada's International Student Program (ISP) is a shared responsibility between IRCC and provinces and territories to facilitate the entry of international students to Canada for study purposes. Through a Memorandum of Understanding between each province and territory and the Government of Canada, each province and territory establishes its own international student designation framework for PSE institutions operating with its jurisdiction that draws from elements in the pan-Canadian designation framework. All DLIs at the postsecondary level (except for institutions located in QC)<sup>15</sup> must use a DLI portal for regular compliance reporting on the academic enrolment status of international students and the submission of bi-annual reports.

Career colleges in Ontario are required to deliver PSE programs for at least three consecutive years immediately before their application for designation with the ISP. Institutional designations are campus specific and the applying career college must achieve the KPIs set by the superintendent, maintain the superintendent's approval of its vocational programs and prove the financial capacity to provide the programs planned for delivery. Additionally, the career college must not have been subject to any administrative penalty in the preceding three-year period. Ontario also requires that the operators (i.e., corporate director, corporate officer, controlling shareholder, owner, partner and any other person who manages or directs affairs at the career college) must not have any prior conviction under the Criminal Code or any other legislation.<sup>16</sup> The requirements for the registration process — such as fire inspection, liability insurance,

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<sup>14</sup> International learners with valid visitor status who pursue programs shorter than 6 months do not need a study permit and may attend any postsecondary institution.

<sup>15</sup> Compliance reporting is provided by the Ministère de l'Éducation, de l'Enseignement Supérieur et de la Recherche for DLIs in QC. Further discussions between the Government of Quebec and IRCC on how this information will be processed and transmitted are underway.

<sup>16</sup> There are further directives for convictions having occurred five years or more and five years or fewer before the institution's application for designation.

occupancy certificate, floor plan and maximum occupancy of students — apply for career colleges seeking DLI status as well.

Important differences exist across provinces. For instance, PCCs in NL, MB and AB must be operating continuously for three years. In SK, however, private vocational schools must be registered for at least 18 months, have graduated at least one cohort of students and meet student loan designation requirements before applying for ISP designation. In BC, a PCC must be continuously operating for 12 months before it is eligible to apply for its ISP designation. For DLI status, they are required to have students enrolled in at least 50% of the approved programs. As of September 2022, PCCs aspiring to become DLIs in BC must hold a registration certificate for the last two years and provide an approved program in at least one of those years. BC incorporated other requirements in the process for designation, such as an additional certificate called the Education Quality Assurance (EQA), meant to maintain a minimum level of quality. To obtain an EQA, the institution must be currently operating and continuously delivering at least one program for a minimum of eight months of the year.

Designated education providers (DEPs) in MB must ensure that their international students are given the opportunity to provide input, and have that input considered, in the annual review. In AB, applicants must read the Alberta Designations Requirement Guide and provide evidence that publicly available policies are in place and are communicated to students about the tuition and fee policies and academic requirements, and they must provide students with supports for academic and career counselling, medical services, mental health services and housing.

Manitoba is the first jurisdiction in Canada to have codified best practices for DLIs under a provincial act. The *International Education Act* works to ensure the integrity of international education programs and protect the safety and welfare of the students they host. Manitoba's Guide to the Code of Practice and Conduct Regulation (2016) — developed in collaboration with representatives from the MB government and designated education providers — is a resource to assist institutions in interpreting and complying with the regulations. The province's Education Institution Eligibility Policy Framework identifies minimum common standards that educational institutions must meet to enrol international students. In addition to complying with the code of conduct, DLIs are required to list the agents they work with on their website, and they must charge the same fees to international students as they do domestic students (International Education Branch of Manitoba Education and Training, 2016). If an institution fails to comply, penalty fines range from \$25,000 to \$50,000 for individuals and corporations (Marwah et al., 2023).

The IRCC announced its intention to adopt a Recognized Institutions Framework to strengthen the overall DLI framework. The proposed framework is part of the broader strategy to modernize the ISP in response to concerns around the vulnerability of international students, the high rate of growth in application volumes and the need for greater diversification of the international student population. The draft framework involves a two-tiered structure for DLIs wherein some DLIs will be designated 'trusted institutions' and receive expedited visa processing. For this purpose, DLIs may be asked for additional data on retention rates for international students, on-time program completion rates, percentage of revenues derived from international tuitions, institutional spending on international student support services, availability of DLI-administered housing and teacher–student ratios (ICEF Monitor, 2023b). However, there have been no

further updates on this proposed approach since the Federal Government announced its cap on international student study permit applications.

#### 4) Student Services and Supports at PCCs

##### Student Funding Programs

Students can access support through three main public funding programs: the Ontario Student Assistance Program (OSAP); Better Jobs Ontario; and Workplace Safety and Insurance Board (WSIB) payments, of which the latter two are not usually repayable and usually involve smaller levels of support than OSAP (Wilson, Ojha, & Williams, 2022). It is critical to note that student aid in the form of financial assistance is available to students across most PCCs in Canada, as long as certain conditions are fulfilled. For example, career colleges in Ontario may offer programs that enable eligible Ontario students to access OSAP funding, and the same is true in other provinces through their respective student financial support systems.

OSAP provides government loans, grants and awards to eligible Ontario postsecondary students. Career college eligibility for OSAP is campus specific and falls under a set of detailed federal–provincial criteria not governed by the *Career Colleges Act, 2005*. The applicant must be in operation for at least two calendar years, have at least 15 students enrolled each year in one or more programs and have at least two graduating cohorts. The career college must also demonstrate graduation rates and graduation employment rates that meet or exceed their respective thresholds for the previous two years. Based on a report from Wilson et al. (2022), around 10% of the OSAP budget goes to students at career colleges. As of March 25, 2024, 192 of 790 campuses are approved for OSAP in Ontario. This means that approximately 24% of career college campuses are approved for OSAP.

##### Student Protections

Recognizing the competitive market pressures in the sector, many of the provisions in Ontario's *Career Colleges Act, 2005* are guided by the logic of consumer protection. Regulations are similar to those seen in other industries, and provincial and territorial governments require private colleges to enter into formal enrolment contracts with students. In Ontario, these formal contracts include:

- the name and address of the career college, and the name of the vocational program as approved by the superintendent;
- the commencement date and expected duration of the program;
- the admission requirements and language of instruction for the vocational program;
- fees and a schedule of payments;
- other costs associated with the program;
- a statement that the career college does not guarantee employment for a student who successfully completes a program offered by the career college;
- acknowledgement that the student has received a copy of the fee refund policy, the statement of student rights and responsibilities developed by the superintendent, the college's student complaint procedure, the colleges sexual violence policy, the consent to the collection and use of personal information and the college's policy relating to student expulsion; and

- the schedule of hours of instruction, method of program delivery and location of instruction (including practicums).

New students who are enrolled directly at Ontario career colleges have two days after their initial registration to cancel their contract — a practice known as a “cooling off” period. Both domestic and international students are entitled to the same protections under Ontario’s Act, including refund policies and eligibility for the Training Completion Assurance Fund.<sup>17</sup> Other required policies apply equally to both domestic and international students at career colleges, such as those related to sexual violence, access to student transcripts and grievance and complaints.

Refund and eligibility policies vary across jurisdictions. For example, students in PCCs in AB can get a full refund of fees on or before the fourth business day after signing their Alberta Student Enrolment Contract with the institution; similarly, private training schools in PEI provide a full refund if less than 20% of a course has been completed. Saskatchewan requires Private Vocational Schools to refund up to 75% of fees if a student withdraws or is discontinued from a program before 20% of program hours have been delivered. If between 20% and 50% of program hours have been delivered, then a refund of up to 40% of fees is issued. After 50% of hours have been delivered, no refunds are provided. Newfoundland and MB do not provide refunds if more than two-thirds of the program has been delivered.

While most provinces require institutions to keep student transcripts post-

graduation, time frames fluctuate: in NS they must be kept for five years and in MB seven years; Ontario, PEI and SK require that they’re kept for at least 25 years; NL and YT require 50 and 60 years respectively; and while NWT does not specify a timeline, transcripts must be maintained in accordance with the minister.

Career colleges in Ontario are monitored to ensure that their advertising complies with regulations. Copies of all advertising must be kept on record for one year after the date of the last publication or broadcast. New career colleges have to submit proposed advertising at the time of registration so that MCU can ensure their compliance with advertising rules. The rules include, for example, not using statements that mislead or are likely to mislead the public, nor guarantee admission to or successful completion of a program, nor imply that employment is guaranteed for any students who successfully complete a vocational program at the college.

Career colleges in Ontario with DLI status are additionally required to include: housing supports (i.e., specific arrangements or links to organizations that offer assistance); health insurance information; academic, career and peer counselling supports (or links to such supports in the community); links to cultural or religious community organizations; and health or other social service supports (or links to such supports in the community). Specifically for international students, career colleges are required to provide a current list of contacts at the nearest embassy or consulate representing the student’s country of citizenship and orientation and/or welcome services.

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<sup>17</sup> Under the Training Completion Assurance Fund, students are given the opportunity to complete a vocational program at another institution or receive a refund in the portion of fees for which they did not receive instruction, in the event their private career college ceases operation. Participation is mandatory for all registered Ontario PCCs (MCU, 2022b).



Similar guidelines, supports and services are required by private institutions in other provinces, such as AB, BC, NL and SK. For example, SK recommends career colleges keep advertised job expectations realistic. This implies substantiating any claims, like “number one” or “the leader,” with statistical evidence. The Private Vocational Schools Administration and Policy Manual further recommends not primarily focusing on student financial assistance schemes as an endorsement of the program value (Ministry of Advanced Education, Private Vocational Schools Unit, 2023). BC provides a student statement of rights published on the Private Training Institutions Branch website in various languages. Several of BC’s supports came as a result of regulatory amendments in September 2021 meant to strengthen student protections, streamline administrative processes and improve public confidence in the private career training sector in the province (key changes include creating a statement of student bill of rights, mandatory site inspections prior to certification and requiring all institutions have a sexual misconduct policy).

Similarly, NB mandates enrolment brochures on the provincial website. Before enrolling in certain programs at some private colleges in NS, students must sign letters acknowledging they may have to move away to find employment, or that they don’t require the course to find a job in their desired line of work. The province ordered one college to inform new students that job prospects were poor in the Maritimes for graduates of two of its programs (Quon, 2017).

Additionally, MB and Ontario have well-defined sexual misconduct policies as part of their contracts. Ontario requires that career colleges have a standalone policy in every enrolment contract between student and college that addresses sexual violence and must appropriately accommodate the needs of these students (MCU, 2022a). Quebec also documents an anti-bullying and anti-violence policy. Private vocational schools in SK are required to provide students with (or at the minimum, direct students to) resources related to housing, mental health supports, academic counselling and life skills, student advocacy, conflict resolution, community connections and so forth. BC provides free mental health counselling through its platform Here2Talk and a comprehensive student handbook, and NL further mandates providing a student handbook at least 48 hours before signing the contract.

See **Table 7 in Appendix B** for a list of common support services across all provinces and territories.

## Conclusion

Despite their prevalence in the postsecondary education sector, there is surprisingly little research available about PCCs. The considerable change currently taking place in the PCC landscape, however, provides a helpful opportunity to better understand the regulatory framework and how it interacts with other parts of the PSE sector. Clarity around how career colleges are established and regulated in Ontario and how that compares to PCCs in other provinces and territories will be critical in contributing to the policy discussions about the future of PCCs when recently announced measures expire in two years. As part of HEQCO’s Consortium on International Education, this report lays the foundation for future work that could provide recommendations for the PCC sector in Ontario.

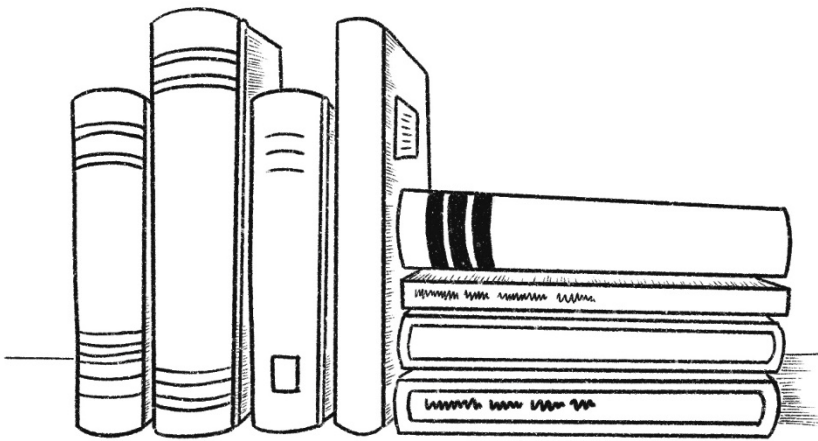
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# Understanding the Regulatory Landscape of Private Career Colleges

Appendices

# Appendix A

## PCPPs: A Unique Provincial Initiative

Much of the media and policy attention focused on PCCs in Ontario concerns their growing involvement as some of the private providers of public educational credentials through Public College–Private Partnerships (PCPPs).<sup>18</sup> PCPPs are an arrangement unique to Ontario that permit a contractual arrangement between a public college of applied arts and technology (CAAT) and a private third party for the delivery (by that third party) of public college programs that lead to credentials from the CAAT (ICEF Monitor, 2023a). Within these arrangements, CAATs are often referred to as the ‘home campuses’ while the private providers are typically referred to as ‘partner campuses’ or ‘partnership campuses.’ This distinction emphasizes that the career college is viewed as a campus of the public college delivering publicly regulated programs. This means the same private partner may be operating multiple programs, only some of which may be partnership arrangements.

While technically open to all students, PCPPs primarily attracted international student cohorts, which may be both a reflection of their location in large urban areas (particularly the GTA) and the result of intentional recruitment strategies on part of the institutions. PCPPs, in fact, catered almost entirely to an international student market (Colyar et al., 2023), recruiting nearly 24,000 international students in Fall 2020 alone (Office of the Auditor General of Ontario, 2021). It is important to note the critical role of revenue generated from international student fees from the private partners, without which some of the public affiliate colleges would have incurred financial losses in the last few years. The federal announcements of January 2024 will severely impact PCPPs, making it likely that most, if not all, partnerships will dissolve due to the ineligibility of students at PCPPs for the Post Graduate Work Permit (PGWP). With this context in mind, it is still important to review the creation and evolution of PCPPs in Ontario in order to learn from their experience as institutions and governments reconsider international recruitment strategies after the two-year period covered by the IRCC announcements.

## The Evolution of PCPP Arrangements in Ontario

In Ontario, the phenomenon of third-party agreements began in 2005 when several small rural colleges opted to find private partners in a bid to recruit international students to urban locations that would be more attractive as a location for study within Ontario.<sup>19</sup> Many of these private partnership campuses were situated several hundred kilometres away from the home (or public college) campus. These arrangements were initially governed under the Entrepreneurial Activities Binding Policy Directive, which permitted colleges to engage in various entrepreneurial activities that support the public entity.

Upon partnering with public colleges, private partners were able to recruit international students to programs eligible for PGWPs. According to a 2021 report from the Auditor General of Ontario, public colleges earned 20% to 30% of the revenue and the private partner retained the rest.

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<sup>18</sup> PCPPs include private providers that are not exclusively PCCs. For example, some private providers who are part of a PCPP, may run a separate PCC, but may do so under different corporate structures, names or on separate campuses.

<sup>19</sup> Our understanding of PCPPs relies heavily on Laurel Schollen’s recent in-depth analysis of the emergence of these initiatives (Schollen, 2023).

Based on a list of approved PCPPs in Ontario shared by an expert, presently 15 Ontario colleges have agreements with private partners.

Table 1 lists these 15 partnerships, noting the public college, private provider and the names of individual owners of the private institution.

**Table 1**

***List of PCPPs in Ontario by Colleges, Private Providers and Ownership***

<b>College</b>	<b>Private Provider</b>	<b>Ownership (Private Partner)</b>
Algonquin (Ottawa)	Vancouver Career College	Peter Chung
Cambrian (Sudbury)	Hanson Canada	Shouyi Ma
Canadore (North Bay)	Stanford International College	Sapna Thakur
Fanshawe (London)	International Language Academy of Canada	Jonathan Kolber & Ilan Cohen
Fleming (Peterborough)	Trebas Institute Ontario	Mohamed Slimani (VP of operations)
Georgian (Barrie)	International Language Academy of Canada	John De Franco
Lambton (Sarnia)	Cestar College	Hufeng Chen
	Queen's College	Jennifer Zhang
Loyalist (Belleville)	Toronto Business College	Simon MacQueen
Mohawk (Hamilton)	triOS College	Stuart Bentley
Niagara (Welland)	Toronto School of Management	Ehsan Safdari
Northern (Timmins)	Pures College	Randy Liu
Sault (Sault Ste. Marie)	triOS College	Stuart Bentley

Sheridan (Brampton)	Canadian College of Technology and Trades	Paul Liu
St. Clair (Windsor)	ACE Acumen	Patti France
St. Lawrence (Kingston)	Alpha International Academy	Vivian Liu

Large urban CAATs in the Greater Toronto Area (GTA) initially refrained from participating in such partnerships because they were already attracting large numbers of international students. Sheridan College, a large public college, was the first CAAT in the GTA to partner with a private provider (the Canadian College of Technology and Trades, or CCTT) to deliver select programs in Fort Erie, Ontario beginning in Fall 2023.

In August 2016, the province’s Ministry of Advanced Education and Skills Training announced a review of PCPP arrangements. David Trick, previously the Assistant Deputy Minister of Ontario’s Ministry of Training, Colleges, and Universities was asked to review college partnership activities under the Minister’s Binding Policy Directive on Entrepreneurial Activities. Trick’s report (2017) identified a number of risks associated with the PCPP programs, including the risks of unethical recruitment practices, limited support services available for PCPP students, and financial and accountability risks. Trick recommended that existing PCPP programs be closed once current cohorts graduated, and that no new programs should be launched. After receiving Trick’s report in 2017, Ontario’s Liberal government ordered the winding down of PCPPs. In 2018, six public colleges were expected to wind down their partnership campuses with private providers with 14,658 students in all. These six colleges were expected to continue to work with the private providers to ensure that all students completed their programs, which was expected to occur in Spring 2021. While MCU directed the wind-down in 2017, it granted an extension in 2018.

In 2018, Doug Ford’s new Conservative Government reversed this decision. By December 2019, the government announced a policy meant to regulate PCPPs, titled Public College–Private Partnerships: Minister’s Binding Policy Directive. The Binding Directive stated that colleges may enter into partnership agreements only with third parties that are independently designated under the ISP. The Directive permitted two international students to be enrolled in a partnership campus for every one international student enrolled at the college’s main campus (a practice called the 2:1 ratio).

In March 2023, the Binding Policy Directive was updated; the most impactful change concerned international student enrolment. First, while the 2019 Directive relied on the 2:1 ratio, the 2023 update changed the policy to a blanket enrolment cap, ruling that a CAAT cannot enrol more than 7,500 international students across *all* partnership campuses. Priority must also be given to domestic students for admission into over-subscribed PSE programs. Any domestic students enrolled in postsecondary programs offered through PCPPs are not counted as part of a college’s partnership international student enrolment for the purpose of determining compliance with the partnership enrolment limits.

Government also charged CAATs with engaging in community consultations. While student support requirements (such as those involving housing, for example) predate the 2023 Directive, community consultations were a new way to ensure communities were prepared to provide the services that students need. Community consultations will be carried out by the public college every two years with reporting to include a description of the consultation process, the key players (other postsecondary institutions, municipal governments, service providers, etc.), a list of issues raised and addressal mechanisms.

The 2023 Directive added accountability measures to ensure that students in PCPPs have access to the same resources and student services as those at home campuses; as part of the PCPP application, the public college was required to submit a list of services offered to students at partnership campuses. In addition, government mandated KPI reporting for all students in PCPP programs to track students' long-term labour market trajectories.

Policy directives have also come from the federal government and go beyond the purview of MCU. For instance, as of 2023, public colleges in Ontario may no longer enter into PCPPs for the delivery of programs in other provinces or territories of Canada. Two public colleges, Cambrian College and St. Lawrence College, have PCPPs in Vancouver, BC. Students enrolled in these programs receive two credentials: one from a private training institution in BC, and one from the public college in Ontario (MCU, 2023a). MCU asked PCPPs to wind these down in September 2017, but in December 2018, government decided that PCPPs would be permitted to continue within limits (Office of the Auditor General of Ontario, 2021). As per federal decision, not only will the existing cross-provincial PCPPs wind down by September 2024, but students enrolled in PCPPs will no longer be eligible for PGWPs after graduation from May 2024 onwards.

These changes were prompted since the PCPP model had remained under a great deal of scrutiny, namely because several public colleges in Ontario became “oversubscribed.” For example, in August 2023, Northern College rescinded offers of admission to 504 international students who were slated to attend Pures College, Northern’s private affiliate located in a suburb of Toronto starting in September 2023 (ICEF Monitor, 2023). Northern stated that the problem occurred because an unexpected number of international visas — more than the college could accommodate — were approved, and the college sent acceptance letters based on past visa trends. Another 200 international students had their acceptance to Northern for enrolment in the January semester revoked in November 2023 (MacDonald, 2023). A similar case occurred in the private affiliate of St. Lawrence College, Alpha College of Business and Technology, in Toronto in May 2022. Several hundred enrolments were suspended. This not only created a reputational risk for the public college system, but also put colleges at a financial risk, since PCPP partnerships are a large source of revenue.

The revised (2023) version of the PCPP Binding Policy Directive stemmed largely from both the AGO’s report and from stakeholder feedback, with an aim to ensure that instances such as those involving Northern College and St. Lawrence College do not happen in the future. As a



part of the latest Federal policy measures,<sup>20</sup> the present Ontario government has also imposed a moratorium on PCPPs.

## Regulating PCPPs

To enter a PCPP, the public college and private entity must enter a formal agreement. Colleges must seek approval from MCU before establishing new partnerships or renewing existing arrangements, and PCPPs require the approval of the college's Board of Governors. MCU must approve these agreements but does not act as a partnership signatory. Partnership agreements between CAATs and private providers must meet all the requirements outlined in the 2023 Binding Directive.

Under the Minister's Binding Policy Directive (2023), public colleges must ensure robust mechanisms for program QA for their affiliate partnership locations, which must operate with the same student protections and standards of services (e.g., access to housing), accountability (e.g., advertising regulations, dispute resolutions) and QA as its home campuses (MCU, 2023a). All CAAT programs, including those delivered by partnership campuses, are subject to the College Quality Assurance Audit Process (CQAAP): a regular, cyclical and institutional-level review of each college's QA mechanisms to develop and ensure continual improvement. The CQAAP includes an audit every five years and ongoing QA processes by the Ontario College Quality Assurance Service.

Mechanisms to ensure compliance with the Minister's Binding Policy Directive, however, are generally lacking. The model depends on details outlined in contracts between the two parties (i.e., the home campus and the partnership campus), and the responsibilities of the public college and the government (Schollen, 2023a). The Binding Directive regulates the PCPP college partnerships, but accountability lies specifically with the main public college contracting the service. There are variations in how closely the public colleges decide to manage their partnerships. The responsibilities of the Ministry are to respond in a timely manner to requests for approval of partnerships, ensure there is as little red tape as possible, and effectively monitor the PCPPs for compliance (Schollen, 2023b).

Public colleges have an implied oversight of their partnerships, but they are considered autonomous entities, with authority to engage in their own entrepreneurial activities and to enforce and design their own robust QA mechanisms. This arrangement, in addition to a lack of provincial regulations means issues can and do fall through the cracks. One common concern is that there is currently no way for MCU to monitor the equality of service provision between home campuses and partnership campuses. For example, the number of student advisors and the ratio of students to advisors may vary drastically between the two. While public colleges are responsible for ensuring that students in their partner campuses are compliant in the basic provision of quality programs, student supports and student advising, this does not necessarily mean equality between the campuses.

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<sup>20</sup> On January 22, 2024, the Federal Government announced a two-year cap on study permits for international students. Additionally, international students will require a provincial/territorial attestation letter to apply for study permit. Also, the students in PCPPs will no longer be eligible for PGWPs starting in May 2024.



## Appendix B

Table 2 lists the names of the Acts that regulate career colleges across Canada. The third column specifies the provincial government department responsible for postsecondary education and training, and the fourth column lists the number of PCCs in the province and the PCCs eligible to recruit international students, called Designated Learning Institutions (DLIs).

**Table 2**

### *Provincial Tuition and Hours of Instruction Standards for PCCs*

<b>Province</b>	<b>Act</b>	<b>Provincial Body In Charge</b>	<b>Number of PCCs and DLIs</b>
<b>AB</b>	<i>Private Vocational Training Act, 2003</i>	Private Vocational Training (PVT) under the Ministry of Advanced Education	221 (99 PCCs as DLIs)
<b>BC</b>	<i>Private Training Act, 2015</i>	Private Training Institutions Branch (PTIB) under the Ministry of Advanced Education, Skills and Training	326 (217 as DLIs; 201 PCCs as DLIs & EQA <sup>21</sup> )
<b>MB</b>	<i>Private Vocational Institutions Act, 2002</i>	Private Vocational Institutions Branch (PVIB) under the Ministry of Advanced Education and Training	64 (13 PCCs as DLIs)
<b>NB</b>	<i>Private Occupational Training Act, 1996</i>	Department of Post-Secondary Education, Training and Labour	46 PCCs (nine PCCs as DLIs)
<b>NL</b>	<i>Private Training Institutions Act, 1990</i>	Department of Education	21 PCCs (nine PCCs as DLIs)
<b>NWT</b>	<i>Post-Secondary Education Act, 2019 (came into force in 2022)</i>	Ministry of Education, Culture and Employment	2 PCCs (zero PCCs as DLIs)
<b>NS</b>	<i>Private Career Colleges Act, 1998</i>	Department of Labour and Advanced Education	40 PCCs (19 PCCs as DLIs)
<b>ON</b>	<i>Private Career Colleges Act, 2005</i>	Ministry of Colleges and Universities (MCU)	780 (291 PCCs as DLIs) <sup>22</sup>
<b>PEI</b>	<i>Private Training Schools Act, 2020</i>	Private Training Schools Division of the Department of Workforce, Advanced Learning and Population	18 PCCs (seven PCCs as DLIs)

<sup>21</sup> EQA represents the BC Education Quality Assurance.

<sup>22</sup> Expert interviews revealed that the total number of PCCs in Ontario (at the time of the interview) was 576. If all the campuses of different colleges were included, the total number was 780. For instance, triOS College has eight campuses within Ontario.

<b>QC</b>	<i>Act Respecting Private Education, College Education Regulations of the General and Vocational Colleges Act</i>	Ministry of Higher Education ( <i>Ministère de l'Enseignement supérieur</i> )	47 private for-profit colleges (45 DLIs)
<b>SK</b>	<i>Private Vocational Schools Regulation Act, 1995; Private Vocational Schools Regulations, 2022; Post-secondary Education and Skills Training Act, 2022</i>	Saskatchewan Private Vocational Schools Branch (PVS Branch)	30 PCCs (five PCCs as DLIs)
<b>YK</b>	<i>Trade School Act, 2000</i>	Department of Education Under the Government of Yukon	Four PCCs (one PCC as DLI)
<b>Nunavut</b>	N/A	Department of Education	N/A

Source: National Association of Career Colleges, 2023; The Canadian Information Centre for International Credentials, 2023.

Table 3 summarizes the minimum bases for inclusion for an organization to be registered as a PCC under various provincial regulations.

**Table 3**

***Provincial Tuition and Hours of Instruction Standards for PCCs***

<b>Province</b>	<b>Tuition Fees</b>	<b>Hours of Instruction</b>
<b>AB</b>	\$1,000	N/A
<b>BC</b>	\$4,000 (Class A) \$1,000 (Class B) \$4,000 (Class C)	40 Hours  Longer than Six Months
<b>MB</b>	Minimum of \$400	Minimum of 40 Hours
<b>NB</b>	Any tuition	21+ Hours
<b>NL</b>	Any tuition	50+ Hours
<b>NS</b>	\$1,000	40+ Hours
<b>ON</b>	\$2,000	40+ Hours
<b>PEI</b>	\$1,000	40+ Hours
<b>QC</b>	Any tuition	45+ Periods of Instruction
<b>SK</b>	\$1,000	50+ Hours
<b>YK</b>	Any tuition	45 Hours

*Note.* In BC, institutions that provide at least one career-related program with 40+ hours of instruction and at least \$4,000 in tuition require a registration certificate. These are class A programs. Institutions that do not offer Class A programs may apply for designation if they offer Class B or Class C programs. Class B programs are career-related programs other than Class A programs at designated/interim institutions for which the tuition fee is less than \$1,000. Class C programs are language programs (i.e., the learning object is for students to gain or improve proficiency in a language) at designated/interim institutions longer than six months, or for which the tuition fees are at least \$4,000.

Table 4 outlines ten categories of QA standards that programs must meet, according to province and territory, if they are to be taught at PCCs in that jurisdiction.

**Table 4**

**Quality Assurance Standards for Programs in Career Colleges Across Canada**

Province	Labour Market Needs Assessment	Curriculum Relevance	Admission Requirements	Facilities, Equipment and Course Materials	Instructor Qualifications	Work Placement Details	Intake, Class Size (Enrolment Projections)	External Review	Prog. Outline, Duration	Employment Forecast
AB	✓ Evidence of labour market demand	✓ Evidence of curriculum relevance	✓	✓ Part of evidence of practicum availability	✓	✓ Evidence of practicum availability		Program evaluation with three or more industry contacts	✓	✓ Part of evidence of labour market demand
BC	As a part of Institution application form	✓	✓ Admission requirements guide	✓		✓ Work experience guide)	✓ Intake models and class size guide	✓ Evaluator's CV	✓	
MB	✓ Application for program review	✓	✓	✓	✓ Statement of who the instructor and substitute instructors will be <sup>23</sup>			✓ Four to six employ-er attestations; industry support	✓	
NL	✓ Needs assessment and market analysis questionnaire	✓	✓	✓	✓	✓		✓ External evaluator	✓	✓

<sup>23</sup> *The Private Vocational Institutions Act*, 9(1)(e)

Province	Labour Market Needs Assessment	Curriculum Relevance	Admission Requirements	Facilities, Equipment and Course Materials	Instructor Qualifications	Work Placement Details	Intake, Class Size (Enrolment Projections)	External Review	Prog. Outline, Duration	Employment Forecast
NS	✓	✓ Part of application for occupational-training program	✓	✓ Part of application for occupational-training program	✓	✓ Part of application for Occupational-training program	✓	✓ Industry review form	✓	✓ Part of application for occupational training program
NWT	✓ Part of the PTI and PVT Quality Assurance Review Application and Renewal Form	✓	✓	✓	✓	✓	✓		✓	
ON <sup>24</sup>	✓	✓	✓	✓	✓			Third-party assessment; subject matter experts	✓	✓
PEI	✓	✓	✓	✓	✓		✓	Expert consultants	✓	✓
QC	Same control mechanisms as CÉGEPs									
SK	✓	✓	✓	✓	✓	✓		Three industry reviews	✓	✓

<sup>24</sup> Although not subject to standards, work placement details and enrolment projections are required in applications for program approval in Ontario.

Table 5 describes the minimum qualifications, prior industry experience and any additional certifications instructors need in order to teach at PCCs in each province and territory in Canada.

**Table 5**

***Requirements for Instructors at PCCs by Province and Territory***

<b>Province</b>	<b>Qualifications</b>	<b>Prior Industry Experience</b>	<b>Additional Certifications</b>
<b>AB</b>	A degree, diploma, certificate or a professional designation in a related field	Minimum of three years of work-related experience  A minimum of 1 year of instructional experience <i>OR</i>	Training certificate in adult education
<b>BC Option 1</b>	A certificate, diploma or relevant postsecondary degree in the subject area.	<i>AND</i> two years of experience relevant to subject matter; <i>OR</i> 10 years of full-time work experience in a career occupation relevant to subject matter.	N/A
<b>BC Option 2</b>	For instructors of a language course, postsecondary degree in language instruction <i>OR</i> a certificate or diploma in language instruction and a postsecondary degree.	For instructors of a language course, two years of full-time work experience teaching a language and certificate or diploma in language instruction <i>OR</i> 10 years of full-time work experience teaching a language.	N/A
<b>MB Option 1</b>	A related bachelor's degree from a university in Canada or an equivalent degree from a university outside Canada.	<i>AND</i> must have 12 months of actual occupational experience in that course or program.	N/A
<b>MB Option 2</b>	Graduated, in a subject related to the course or program from a community college in Manitoba or an equivalent institution outside Manitoba, <i>OR</i> , a registered private vocational institution, or a trade or vocational institution or a trade or vocational institution registered elsewhere in	<i>AND</i> 24 months' actual occupational experience in that course or program.	N/A

	Canada or an equivalent institution outside Canada.		
<b>MB Option 3</b>	N/A	Thirty-six months' experience as an instructor in that course or program.	N/A
<b>MB Option 4</b>	N/A	Forty-eight months' actual occupational experience in the vocation.	N/A
<b>NB</b> (Required information in the Application for Registration of a Teacher-Instructor)	<ul style="list-style-type: none"> <li>• Instructor's educational qualifications;</li> <li>• previous registration details if previously associated with another PCC;</li> <li>• details of the programs to be taught; <i>AND</i></li> <li>• details if their prior registration has ever been revoked.</li> </ul>	Teaching and program-related experience for the past five years.	N/A
<b>NL</b>	<ul style="list-style-type: none"> <li>• Instructors having a Bachelor of Education degree must complete certain Memorial University education courses in a stipulated time period (at the rate of two courses per year).</li> <li>• Instructors having a Master of Education degree or a Bachelor of Post-secondary education degree are not required to complete additional courses but may apply for a postsecondary instructor's certificate.</li> </ul>	<ul style="list-style-type: none"> <li>• Years of experience within the field and the combination of training and experience shall equal a total of six years including certification mentioned in the fourth column.</li> <li>• For demonstrators, minimum of one year of work experience and a diploma/certificate is mandatory.</li> </ul>	<ul style="list-style-type: none"> <li>• Instructors have a certificate or diploma related to the field of instruction supplemented by 6 years of experience.</li> <li>• Instructors also have to complete a teacher training program as prescribed by the minister.</li> </ul>
<b>NS Option 1</b>	A bachelor's degree from a Canadian university or an equivalent degree from a university outside of Canada in a subject related to the subject or vocation to be taught.	<i>Followed by 12 months' occupational experience in the subject or vocation to be taught.</i>	An instructor in an apprenticeship trade should hold a certificate of qualification issued under the <i>Apprenticeship and</i>

<b>NS Option 2</b>	Evidence of graduation from a program of any of the following institutions, or an equivalent institution outside of the province, in a subject related to the subject or vocation to be taught.	<i>Followed by 24 months' occupational experience in the subject or vocation to be taught.</i>	<i>Trades Qualifications Act in the trade to be taught AND should have two years' experience in the trade at the journey person level.</i>
<b>NS Option 3</b>	A Bachelor of Education degree or a valid Nova Scotia teacher's certificate issued under the <i>Education Act</i> .	<i>Together with 24 months' occupational experience in the subject or vocation to be taught.</i>	
<b>NS Option 4</b>	N/A	Sixty months' occupational experience in the subject or vocation to be taught.	
<b>NS Option 5</b>	N/A	<i>If teaching experience is less than one year, then instructors must, in their first year of employment as an instructor, enrol in an instructional methods or train-the-trainer program approved by the Director, and must complete this program within three years from the beginning of employment and provide the Director with written verification of enrolment and of completion.</i>	
<b>NWT</b>	The Private Training Institution and Private Vocational Training Quality Assurance Review Application and Renewal requires additional information about the "minimum qualification of instructors" and "list of instructors and their qualifications."		
<b>ON Option 1</b>	Must have either an Ontario bachelor's degree (or equivalent degree outside Ontario) <i>or a certificate</i> (indicated in column four) or status as a graduate of an Ontario CAAT or registered PCC (or equivalent institution outside Ontario)	<i>OR at least 24 months of experience, within the previous 10 years, working or teaching in the vocation AND one of the qualifications in column two.</i>	A certificate of qualification issued under the <i>Ontario College of Trades and Apprenticeship Act, 2009</i> (or equivalent Canadian certificate).



<b>ON Option 2</b>	N/A	Must have at least 48 months of work or teaching experience in the vocation in the past 10 years. This can be four years of work experience, four years of teaching experience or a combination of both.	N/A
<b>PEI Option 1</b>	Should have a degree from a recognized university in an area of study related to the course.	<i>As well as</i> at least 12 months' actual work experience in the occupation to be instructed.	N/A
<b>PEI Option 2</b>	Should be a graduate of a community college or CAAT or a registered PCC.	<i>As well as</i> at least 24 months' actual work experience.	
<b>PEI Option 3</b>	Should have a high school diploma.	<i>As well as</i> at least 48 months' of actual work experience, and have at least 36 months' of teaching experience in the course for which instruction is to be given.	
<b>QC</b>	Should possess qualifications determined by the institution and approved by the Minister.		
<b>SK</b>	Should have a degree from a university/ educational institution recognized by the minister in an area of study related to the vocation to be taught.	Should have at least 12 consecutive months' of occupational experience in that vocation or possess at least three years' of occupational experience in the vocation to be taught.	Must have a Journeyperson certification in applicable trade.
<b>YK</b>	N/A	Should have five years' of practical experience	Should be a holder of the highest-class certificate of inter-provincial Red Seal Certificate for the trade issued under the <i>Apprentice Training Act</i> and other qualifications deemed necessary by the Registrar.

Table 6 provides a list of means and procedures by which PCCs maintain their license across the provinces and territories of Canada.

**Table 6**

***Procedures for Maintaining PCC Licenses by Province and Territory Across Canada***

	<b>AB</b>	<b>BC</b>	<b>MB</b>	<b>NB</b>	<b>NL</b>	<b>NWT</b>	<b>NS</b>	<b>ON</b>	<b>PEI</b>	<b>QC</b>	<b>SK</b>	<b>YK</b>
<b>Registration</b>	Annual	Expiry seven months after end of the PCC's fiscal year; EQA annual 30 days after certificate renewal.	Annual Dec. 31.	Annual	Annual Dec. 31.	Five years	N/A	Annual Dec. 31	Annual	Valid for three years; renewed for five years.	Annual June 1.	Annual Sept. 1.
<b>DLI</b>	Maintain student loan repayment rates at acceptable level. Monitored annually using a three-year evaluation cycle.	Within one year of initial designation and within seven years of the most recent Designation Review.	Provisional designation for a minimum of two years.	Fifth year following designation.	N/A	Annual	N/A	Annual	N/A	N/A	Annual Oct 31	N/A
<b>Industry records</b> <sup>25</sup>	Every two years.	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Instructor qualifications</b>	Every two years.	At least once every two years.	N/A	N/A	N/A	N/A	Annual	N/A	N/A	N/A	Regular evaluations of instructor skills and abilities to learn and improve the quality	N/A

<sup>25</sup> Industry support includes labour market demand for graduates, curriculum relevance and suitability of admission requirements.

											of instruction.	
<b>Financial statements by CPA</b>	Annual (Annual Tuition Revenue Statutory Declaration for Licensed Programs)	Annual	N/A	Annual	Ninety days after PTI's fiscal year end.	N/A	No later than 180 days after the end of that fiscal year.	N/A	Annual on or before July 1.	N/A	Annual	N/A
<b>Paperwork</b> <sup>26</sup>	Annual	N/A	N/A	N/A	Annual	Annual	Annual	N/A	Annual	N/A	Annual	N/A
<b>Consultation with local communities</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Every two years for PCPPs.	N/A	N/A	N/A	N/A
<b>Student graduation data</b>	Annual	N/A	Annual (country of origin of students enrolled to be reported as well).	N/A	N/A	Annual	N/A	Summer/fall/winter.	N/A	N/A	N/A	N/A
<b>Job placement data</b>	Annual	N/A	N/A	N/A	N/A	Annual	N/A	N/A	N/A	N/A	N/A	N/A
<b>Repayment rates</b>	N/A	N/A	N/A	N/A	N/A	Annual	N/A	N/A	N/A	N/A	N/A	N/A
<b>Graduate satisfaction surveys</b>	Every two years.	N/A	N/A	N/A	N/A	N/A	N/A	Summer/fall/winter.	N/A	N/A	N/A	N/A
<b>Employer satisfaction surveys</b>	Every two years.	N/A	N/A	N/A	N/A	N/A	N/A	Summer/fall/winter.	N/A	N/A	N/A	N/A
<b>Graduation employment rate</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Summer/fall/winter.	N/A	N/A	N/A	N/A
<b>Graduate employment</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Summer/fall/winter.	N/A	N/A	N/A	N/A

<sup>26</sup> Paperwork includes: student application forms, student contracts and enrolment agreements; a copy of the policies, rules and regulations of the college; a list of the names of all instructors and instructor assistants at the college; copies of current renewable licenses, certifications or other credentials required by instructors and instructor assistants at the college; and written notices that any premises, equipment and other facilities used to deliver a program comply with industry standards and with all applicable building, fire, health, sanitary and safety laws.

<b>rate in the field of study</b>												
<b>Graduate employability</b>	N/A	N/A	N/A	N/A	N/A	N/A	At 12 months following graduation or 24 months following graduation on Director's request.	N/A	N/A	N/A	N/A	N/A
<b>Inspections/ reviews</b>	N/A	Any time	Annual	Any time	Annual	N/A	N/A	Any time	Any time	N/A	Any time	N/A
<b>Program assessment</b>	N/A	N/A	Fifth year after designation	N/A	N/A	Five years.	N/A	N/A	N/A	N/A	N/A	N/A
<b>Program renewal</b>	N/A	N/A	N/A	N/A	N/A	N/A	5 years or as specified by the superintendent	One year.	N/A	N/A	One year.	N/A

**Table 7**

**List of Student Support Services at Private Colleges by Province and Territory**

	AB	BC	MB	NB	NL	NWT	NS	ON	PEI	QC	SK	YK
<b>Enrolment contracts</b> <sup>27</sup>	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Immigration pathway</b>	None	None	None	NB Pilot	None	None	None	None	None	Closed Sept. 2023	None	None
<b>Keeping transcripts after graduating</b>	N/A	N/A	✓	N/A	✓	✓	✓	✓	✓	N/A	✓	✓

<sup>27</sup> Enrolment contracts: Clear, transparent student contracts identifying the program of study, associated program cost and fees, admission requirements, primary method of program delivery, expected hours of instruction, payment schedule, tuition refund policy, etc.

<b>Published policies on website/ additional support</b>	N/A	✓	✓	✓	✓	N/A	✓	✓	N/A	✓	✓	N/A
<b>Information about student supports</b> <sup>28</sup>	✓	✓	✓	N/A	✓	N/A	N/A	✓	N/A	N/A	✓	N/A
<b>Training completion assurance fund</b>	N/A	✓	✓	✓	✓		✓	✓	✓	N/A	✓	N/A
<b>Student aid</b>	✓	✓	✓	✓	✓	✓	N/A	✓	✓	N/A		✓
<b>Refund policy</b>	✓	N/A	✓	N/A	✓	N/A	N/A	✓	✓	N/A	✓	N/A
<b>Guidelines for advertising</b>	✓	N/A	✓	N/A	✓	✓	N/A	✓	✓	✓	✓	N/A
<b>Conflict resolution</b>	✓	N/A	✓	N/A	✓	N/A	N/A	✓	N/A	N/A	✓	N/A
<b>Designated staff member</b>	N/A	✓	N/A	N/A	✓	N/A	N/A	✓	N/A	✓	N/A	N/A

<sup>28</sup> Information about student supports: Links to organizations that can assist the individual in finding appropriate housing, confirmed information on where students can obtain health insurance, confirmed links where academic and peer counselling supports can be accessed, links to cultural and religious community organizations, a current list of contacts at the nearest embassy or consulate representing that student's country of citizenship and orientation/welcome services for international students at the time of arrival.