



Evaluation of the International Student Program

Evaluation Division

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List of acronyms

CBSA	Canada Border Services Agency
CCIE	Canadian Consortium for International Education
CEC	Canadian Experience Class
CIC	Citizenship and Immigration Canada
CPC	Case Processing Centre
CPC-V	Case Processing Centre - Vegreville
DFATD	Department of Foreign Affairs, Trade and Development
ESDC	Employment and Social Development Canada
FOSS	Field Operations Support System
FY	Fiscal Year
FTE	Full Time Equivalent
GOC	Government of Canada
GCMS	Global Case Management System
IES	International Education Strategy
IRPA	Immigration and Refugee Protection Act
ISP	International Student Program
O&M	Operations and Maintenance
OGD	Other Government Departments
PR	Permanent Residency
TBS	Treasury Board Secretariat
TR	Temporary Residency
TRP	Temporary Resident Program
TRV	Temporary Resident Visa
VAC	Visa Application Centre
VESPA	Visa Exempt Study Permit Abroad

Executive summary

Purpose of the Evaluation

This report presents the results of the evaluation of the International Student Program (ISP). The evaluation was conducted in fulfillment of the requirements under the Treasury Board of Canada *Policy on Evaluation*,¹ and focuses on activities undertaken, outputs, and immediate outcomes achieved from 2009 to 2013, as well as the introduction of new regulatory changes in 2014. The data collection for this evaluation was undertaken by the Research and Evaluation Branch of Citizenship and Immigration Canada (CIC), between February and September 2014.

Program Profile

International students provide social and economic benefits to the education sector as well as the communities in which they reside. Along with temporary foreign workers and International Experience Canada, international students make up one of the three temporary economic resident classes included under CIC's Strategic Outcome 1: *Migration of permanent and temporary residents that strengthens Canada's economy*. While a number of federal and provincial partners share responsibilities with respect to international students, CIC's International Student Program is primarily responsible for facilitating the entry of international students via the processing of study permits. In June 2014, CIC instituted a number of regulatory changes to the ISP to strengthen program integrity including the creation of provincially-approved lists of designated learning institutions and requiring students to actively pursue study while in Canada on a study permit.

Between 2009 and 2013, 495,214 foreign nationals entered Canada with study permits (on average 99,043 per year). The demographic profile includes the following:

- **Gender:** Study permit holders were slightly more often male (55%) than female (45%)
- **Age:** Study permit holders were mainly between 18 and 25 years of age (62%)
- **Level of Study:** Most were studying at the university level (42%)² or at another post-secondary level (21%)³
- **Source Country:** China and India were the most frequent source countries for students (22% and 11%, respectively)
- **Province/Territory:** Ontario received the largest share of students (42%), followed by British Columbia (28%) and Quebec (16%)

In terms of the program costs, the annual federal cost (including CIC and other government departments) for the ISP ranged from \$34.04M to \$47.81M per fiscal year between 2009/10 and 2012/13, with an annual average of \$41.13M.⁴

Methodology

The evaluation examined the International Student Program, as well as the use of the Off-Campus Work Permit Program and the Post-Graduation Work Permit Program; however, the outcomes of

¹ Treasury Board (2009) *Policy on Evaluation*.

² University level includes bachelor, master, and doctoral levels.

³ Other post-secondary institutions include language institutions, private (non-public) educational institutions and university qualifying programs (not at the university or trade level).

⁴ These figures include the total federal processing costs for study permits but does not include CIC's costs associated with policy and program development.

these work programs were not included in this evaluation.⁵ In addition, the evaluation addressed the five core issues identified in the Treasury Board Secretariat (TBS) *Directive on the Evaluation Function*.

In order to meet departmental evaluation coverage requirements, the evaluation was calibrated and scaled down to adopt the following approaches:

- Limiting the methodology to three lines of evidence - key informant interviews, document review, and administrative data review;⁶
- Focusing solely on assessing the Program's immediate expected outcomes including addressing issues identified in the previous evaluation regarding program integrity as well as application processing;⁷ and
- Conducting the evaluation in-house with a moderated level of effort in terms of number of Full Time Equivalent (FTE) staff and days allocated to complete the evaluation.⁸

Due to the timing of the regulatory changes which took effect in 2014, the evaluation is expected to serve as a benchmark for the evaluation of the ISP planned for 2018/19.

While the evaluation encountered several data limitations (as described in Section 2.4), it is important to note that none had a significant impact on the evaluation findings.

Evaluation Findings

Evaluation findings were grouped into four themes: relevance, performance management, processing, and resource utilization.

Relevance

The evaluation found that there is a continuing need to facilitate the entry of international students, as they provide economic and socio-cultural benefits to Canada. The evaluation also found that the ISP aligns with federal roles and responsibilities to manage the entry of international students to Canada; however, there is also a strong role for provinces and educational institutions to play in terms of supporting program integrity. In addition, it was found that ISP is strongly aligned with Government of Canada and CIC priorities to strengthen the Canadian economy.

Performance - Program Management Outcomes

The evaluation found that there is a lack of an effective whole-of-government approach between federal departments regarding international students. Many interviewees expressed that there has been a lack of a coordinated approach to dealing with international students across the federal government.

Regarding the coordination with external stakeholders, the evaluation findings indicate that while it is sometimes difficult for provinces and territories to know where to direct complex questions regarding the ISP and their clients, CIC's engagement with provinces and territories has been effective. In addition, CIC's engagement with educational institutions was also found to be effective; however, there is a need to provide educational institutions with guidance on their reporting requirements as per the 2014 regulatory changes.

⁵ These outcomes will be assessed in the evaluation of the Temporary Foreign Worker Program (Labour Market Opinion exempt), which is scheduled for 2016/17.

⁶ By comparison, the 2010 ISP Evaluation incorporated a document review, 43 interviews, 4 surveys, an administrative data review, and a literature review.

⁷ It is anticipated the timing of the next evaluation of the ISP (scheduled for 2018/19) will allow for a complete assessment of both immediate and intermediate outcomes.

⁸ The evaluation was conducted by a team of four CIC evaluators and was allocated 180 person days to complete.

The evaluation findings suggest that there is a need to improve coordination and internal communications to address gaps relating to: information sharing on program integrity; referral protocols between processing offices; and departmental guidance on CIC's role in supporting promotional activities.

CIC has taken measures to address issues identified in the previous evaluation related to program integrity and application processing, primarily by creating lists of designated educational institutions, requiring international students to be actively pursuing their studies and through the implementation of initiatives to modernize its processing network. Although CIC undertook many program integrity assessment activities across the department, there are opportunities for better sharing of program integrity tools, procedures, and reporting across CIC's network.

In addition, some program issues and data gaps were identified through the evaluation. As the policy context surrounding international students has evolved and given the recent changes to the ISP, several data and program issues emerged, suggesting there may be an opportunity for CIC to review its program priorities and objectives.

Performance - Processing Outcomes

Between 2009 and 2013, the number of international students in Canada increased by approximately one third and since the previous evaluation, processing times has increased for both study permit applications and study TRVs. While CIC is meeting its service standard for study permits, it is not meeting its service standard for study TRVs.

Early modernization-related findings suggest mixed results regarding the impact of modernization initiatives on the timeliness of application processing. Compared to paper applications, e-applications and Visa Application Centres seem to represent faster processing methods for study permits; however, this is not the case for study TRVs.

Performance - Resource Utilization

Between FY 2009/2010 and FY 2012/2013, total ISP costs have decreased by roughly one third, largely as a result of reductions in support and other government departments (OGD) costs. However, direct program delivery costs have increased by around one quarter over the same period. The total cost per study permit application decision has decreased, suggesting increasing cost effectiveness.

Conclusions and Recommendations

Based on the evaluation evidence and findings presented in this report, the following conclusions and recommendations are put forward.

The ISP remains relevant as it responds to a continuing need, aligns with federal and departmental priorities, and is aligned with federal role and responsibilities.

Recommendation 1 - CIC should work with federal partners to:

- Increase OGD coordination around program delivery and to further clarify departmental roles and responsibilities regarding the ISP; and
- Ensure compliance and enforcement of the 2014 ISP regulatory changes.

Recommendation 2 - In light of GOC priorities for international students and the evolving CIC policy context, CIC should review and clarify the program logic for the ISP and more particularly its

expected outcomes, also taking into consideration relevant temporary and permanent resident programs.

Recommendation 3 - CIC should review its policies and operational guidance regarding minor students and custodianship.

Recommendation 4 - CIC should strengthen information sharing across its processing network regarding program integrity (tools, best practices and reporting) and case referrals.

Recommendation 5 - CIC should monitor and report the impact of modernization initiatives on the ISP and identify opportunities to improve ISP processing times.

Recommendation 6 - CIC should develop and implement a strategy to address ISP data quality issues.

These recommendation components are elaborated in Section 7.

Evaluation of the International Student Program—Management Response Action Plan

Recommendation	Response	Action	Accountability	Completion Date
<p>Recommendation #1: CIC should work with federal partners to:</p> <ul style="list-style-type: none"> ▪ Increase OGD coordination around program delivery and to further clarify departmental roles and responsibilities regarding the ISP; and ▪ Ensure compliance and enforcement of the 2014 ISP regulatory changes. 	<p>CIC agrees with this recommendation and preliminary work for this recommendation is already underway.</p> <p>Several federal departments have a role related to international students in Canada. The previous evaluation identified challenges that this can create, as the lead departments (CIC, CBSA and DFATD) have their own mandates that sometimes work at cross-purposes. This has continued to be the case since the last evaluation, despite efforts taken by CIC since that time.</p>	<p>CIC will develop a Stakeholder Engagement Plan in order to put in place a more regular process for working with partners, including other federal departments, on ISP issues.</p> <p>CIC will ensure that International Student Program issues are raised to senior levels by ensuring that the International Student Program is a standing agenda item at existing governance mechanisms and meetings.</p>	<p>Immigration Branch Support: OMC</p> <p>Immigration Branch</p>	<p>Q1 2015-16</p> <p>Q1 2015-16</p>
	<p>While there are existing fora that facilitate coordination between CIC and CBSA and CIC and DFATD, both at the working and senior management levels, there is an opportunity to better leverage these fora in order to better work towards a whole-of-government approach to international students, and to identify inconsistencies that may arise due to the implementation of each department's unique mandate.</p>	<p>CIC, in collaboration with partners, will develop operational guidelines for assessing whether international students in Canada are complying with their study permit conditions.</p>	<p>OMC</p>	<p>Q3 2015-16</p>
	<p>CIC aims to improve program and policy coherence across departments, through increased communications and collaboration with other federal departments, both at the working level and at senior management levels. CIC works with federal partners on an ad hoc basis, as necessary, in order to manage different priorities as they arise.</p> <p>In order to support compliance monitoring in light of the 2014 ISP regulatory changes, CIC is implementing a Designated Learning Institution Portal for the ISP. However, on-going monitoring will require additional funding, thus CIC will continue to seek investment to support this activity.</p>	<p>CIC, in collaboration with partners, will also develop administrative and operational processes to proactively use the information collected through the Designated Learning Institution Portal for ISP compliance reporting, to systematically assess compliance of international students. [contingent on spending authority]</p>	<p>OMC</p>	<p>Q3 2015-16</p>

Recommendation	Response	Action	Accountability	Completion Date
<p>Recommendation #2:</p> <p>In light of GOC priorities for international students and the evolving CIC policy context, CIC should review and clarify the program logic for the ISP and more particularly its expected outcomes, also taking into consideration relevant temporary and permanent resident programs.</p>	<p>CIC agrees with this recommendation.</p> <p>The evaluation revealed that the current ISP logic requires clarification, and in particular, those outcomes that relate to permanent residency. For example, transition to permanent residence is listed as an immediate outcome; whereas, if it were to happen, it would happen in the intermediate timeframe. The logic model also includes an immediate outcome of “selection processes are timely and consistent while supporting program integrity”. The use of the term “selection” is confusing in this context as it refers to decision making around permanent residents not temporary residents - this outcome will need to be revised.</p> <p>The logic model review will also take into consideration relevant temporary and permanent resident programs, as well as OGD priorities.</p>	<p>CIC will review the current ISP logic model and in particular its expected outcomes, and will make revisions as necessary.</p>	<p>Immigration Branch</p>	<p>Q2 2015-16</p>
<p>Recommendation #3:</p> <p>CIC should review its policies and operational guidance regarding minor students and custodianship.</p>	<p>CIC agrees with this recommendation and preliminary work for this recommendation is already underway.</p> <p>Taking into account CIC’s role in the application of Paragraph 30(2) of the Immigration and Refugee Protection Act, and Paragraph 215(1)(f)(i) of the Regulations which came into force on June 1, 2014, CIC is committed to review the implications that these provisions have on minors who are studying in Canada without a study permit, and their eligibility to apply for a study permit from within Canada. Operational instructions concerning the application of these provisions are outlined in the Program Delivery Instructions.</p>	<p>CIC will identify and assess the gaps that exist in current processing guidelines.</p> <p>CIC will consult provinces and territories, as well as the K-12 sector, to clarify each department and agency’s roles and responsibilities with respect to foreign minor children in Canada.</p>	<p>OMC</p> <p>Support: Immigration Branch</p>	<p>Q1 2015-2016</p> <p>Q3 2015-2016</p>

Recommendation	Response	Action	Accountability	Completion Date
	<p>With respect to CIC's custodianship requirement for minor study permit applicants, CIC is further committed to review the implications of this requirement, including the validity of the custodianship once the minor enters Canada, and clarify the Department's objectives for requiring custodianship as well as its role in retaining the information.</p>	<p>CIC will revise its operational guidelines (i.e., the Program Delivery Instructions), and the application forms, as well as update information on CIC's website to ensure clarity.</p>	<p>Support: Immigration Branch</p>	<p>Q4 2015-2016</p>
<p>Recommendation #4: CIC should strengthen information sharing across its processing network regarding program integrity (tools, best practices and reporting) and case referrals.</p>	<p>CIC agrees with this recommendation. OMC Branch continues to promote staff awareness and understanding of existing program integrity tools.</p> <p>Training to staff includes the Program Integrity (PI) Tool, which is a web-based application to conduct program integrity exercises, as well as the 5-Step Approach on Conducting Program Integrity Exercises. Since December 2012, a total of 35 webinars have been conducted, as well as 6 international and 9 domestic in-person training sessions.</p>	<p>As part of the upcoming interim Program Integrity Strategy for the Integrated Network Project, and pending overall approval of the Strategy, CIC will make the use of the PI Tool mandatory. This interim Strategy will be implemented in a phased approach, starting in Summer 2015-16.</p>	<p>OMC</p>	<p>Q2 2015-2016</p>
	<p>CIC has the primary responsibility for screening, detecting and preventing first-level fraud and for assessing eligibility for benefits under Canada's immigration and citizenship programs. The Program Integrity Framework is available to guide CIC staff on how to best incorporate risk management, quality assurance and fraud detection and deterrence principles into their daily work. CIC aims to achieve greater consistency with respect to the usage of existing tools across the network.</p>	<p>CIC will continue to provide ongoing training either in-person (whenever possible) or by webinar. Additional webinars and training will take place over 2015-16.</p> <p>CIC will ensure that PI final reports are systematically reviewed for fraud trend analysis.</p>	<p>OMC</p>	<p>Q3 2015-2016</p>
	<p>OMC also provides functional guidance and support to all offices (in-Canada or abroad) on the development of program integrity exercises to ensure the objective and methodology are sound and questions are targeted to the scope.</p>	<p>CIC will identify the gaps in how information concerning program integrity issues and case referral information is shared across the network. OMC will raise staff awareness of available standardized</p>	<p>OMC</p>	<p>Q3 and on-going</p>

Recommendation	Response	Action	Accountability	Completion Date
		protocols and points of contact to ensure information sharing on program integrity issues happens in a systematic way.		
	Additionally, the Department is also implementing a Designated Learning Institution Portal to monitor the status of international students once a study permit is issued. The objective of this initiative is to strength the integrity of the ISP – information obtained from institutions will be available in GCMS and will allow officers to assess whether international students are complying with their study permit conditions.	CIC will continue to add Program Integrity exercise reports to the Program Integrity Exercise Repository, which will be made available on CIC Connexion. With respect to the Designated Learning Institution Portal for compliance reporting, CIC will develop and issue operational guidelines to ensure that study permit compliance will be assessed consistently. [contingent on spending authority]	OMC	Q3 2015-2016
<p>Recommendation #5:</p> <p>CIC should monitor and report the impact of modernization initiatives on the ISP and identify opportunities to improve ISP processing times.</p>	<p>CIC agrees with this recommendation.</p> <p>CIC is committed to its modernization agenda and ensuring a more responsive system of doing business, offering better client service, more efficient and effective application processing, stronger program integrity, reduced fraud, and optimal use of technology.</p>	CIC will produce weekly processing reports on temporary resident applications, including study permit applications, that outline the processing times by application submission channel (i.e., e-App, VAC, other).	OPMB Support: CPR, IR	Q4 2015-16 and ongoing
	<p>There are a variety of modernization initiatives that CIC has implemented over the past several years, and more initiatives are planned. Many of these initiatives are designed to have a positive impact on the processing of study permits and study TRVs, including e-Application, e-Medical, GCMS, workload distribution (e.g. VESPA), VACs and other facilitation measures for international students such as the Student Partner Program (SPP). It is difficult to isolate the impact of particular modernization initiatives and report on these distinctly in relation to processing times.</p>	<p>CIC will improve processing times by promoting the submission of e-Applications and finding processing efficiencies (e.g. identifying low-risk cases to be centralized).</p> <p>CIC will develop facilitative measures in order to accelerate study permit processing times, including the expansion of initiatives to Brazil for Students without Borders and Saudi Arabia for government sponsored</p>	OPMB Support: CPR, IR	Q4 2015-16 and ongoing

Recommendation	Response	Action	Accountability	Completion Date
		students.		
	CIC recognizes the importance of monitoring and reporting on all modernization initiatives and currently undertakes this activity on a weekly basis through the TR Weekly Reports. These reports are reviewed by the appropriate branches and any necessary operational adjustments are made in order to meet departmental and program objectives. CIC continues to engage in this activity and to use the information in support of modernization and other departmental objectives.	CIC will track ISP operational commitments made to Treasury Board Secretariat as a component of a suite of Temporary Resident commitments.	OPMB Support: CPR, IR	Q4 2015-16 and ongoing
Recommendation #6: CIC should develop and implement a strategy to address ISP data quality issues.	CIC agrees with this recommendation. As the evaluation highlighted, there are continuing inconsistency and reliability issues with certain ISP data, including concerns with data on short-term students (SX-1 visas), distribution of students by level of study, data on the field of study, and last country of permanent residence.	CIC will develop and implement a data strategy to address the ISP data quality issues. <ul style="list-style-type: none"> ▪ CIC will develop an issue analysis and determine steps for resolution in a ISP Data Plan through the Data Governance Council (DGC) and the Data Executive Steering Committee (DESC). 	Research and Evaluation Branch Support: OPMB, SIMB	Q3 2015-16
	In order to effectively address the data integrity issues, a whole-of-CIC approach needs to be taken, using the departmental data governance mechanisms, as there are implications across sectors. Developing and implementing a comprehensive data strategy for ISP will require close collaboration of R&E, OPMB, SIMB, and OMC.	<ul style="list-style-type: none"> ▪ CIC will implement the ISP Data Plan. 	Support: OPMB, SIMB	Q4 2015-16

1. Introduction

1.1. Evaluation Purpose

This report presents the results of the evaluation of the International Student Program (ISP). The evaluation was conducted in fulfillment of the requirements under the Treasury Board of Canada *Policy on Evaluation*,⁹ and focuses on activities undertaken, outputs, and immediate outcomes achieved from 2009 to 2013, as well as the introduction of new regulatory changes in 2014. The data collection for this evaluation was undertaken by the Research and Evaluation Branch of Citizenship and Immigration Canada (CIC), between February and September 2014.

This evaluation report is organized into the following sections:

- **Section 1** presents the purpose of the evaluation and the profile of the Program;
- **Section 2** presents the methodology for the evaluation, and discusses strengths and considerations;
- **Sections 3, 4, 5 and 6** present the findings, organized by evaluation issue; and
- **Section 7** presents the conclusions and recommendations.

1.2. Program Profile

This section provides an overview of the International Student Program, including: the policy and program context, program description and expected outcomes, partners and stakeholders, a profile of the number of international student admissions, characteristics of international students, and program costs.

1.2.1. Policy and Program Context

International students bring many benefits to the institutions at which they study, the communities in which they live, as well as the national economy. As a result, there is strong competition abroad for international students with many countries investing in promotion, recruitment and streamlining their processes to attract and retain international students. CIC's International Student Program is responsible for facilitating the entry of international students to Canada for study purposes.

Legislative and regulatory framework

As per the 2002 *Immigration and Refugee Protection Act* (IRPA) and corresponding regulations, CIC is responsible for issuing study permits and visas, which authorize international students to legally enter Canada and pursue their studies.¹⁰ As part of the process of assessing study permit applications, CIC officers abroad and in Canada ensure that the proper eligibility, financial, and security requirements are met, including the bona fides of all applicants. Along with temporary foreign workers and International Experience Canada, international students make up one of the three temporary economic resident classes included under CIC's Strategic Outcome 1: *Migration of permanent and temporary residents that strengthens Canada's economy.*

⁹ Treasury Board (2009) *Policy on Evaluation*.

¹⁰ Under the *Immigration and Refugee Protection Regulations*, Section 2, a “study permit” is a written authorization to engage in academic, professional, vocational or other education or training in Canada that is issued by an officer to a foreign national.

A previous evaluation of the International Student Program conducted in 2010¹¹ found that the existence of several Program design gaps left the ISP vulnerable to potential fraud and misuse.¹² CIC agreed with these findings and began working with various federal and provincial/territorial stakeholders, as well as stakeholder members of the Canadian Consortium for International Education (CCIE) to develop a suite of regulatory amendments to strengthen program integrity. These amendments came into effect on June 1, 2014,¹³ and introduced several key changes to the ISP such as limiting the issuance of study permits to designated post-secondary learning institutions, including those identified by provinces and territories,¹⁴ requiring study permit holders to enrol and actively pursue studies at a designated learning institution while in Canada, and allowing CIC to request evidence when there is reason to believe that a student is non-compliant with study permit conditions or as part of a random sampling exercise.¹⁵ In support of the regulations, CIC is currently developing a compliance reporting portal which will allow designated post-secondary institutions to report to CIC on the enrolment status of their international students.¹⁶

Requirements for working as an international student

In addition to specifying who can study in Canada (with or without a permit), IRPA's regulatory framework also sets out work privileges and application requirements for international students. International students that meet program requirements are eligible to work in Canada during their studies, and/or after graduation. There are four main types of employment in which international students can engage:¹⁷

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 a post-secondary institution (public or private).

Off Campus: Prior to June 1, 2014, international students studying at publically-funded and certain privately-funded post-secondary institutions seeking to work off campus were required to apply for a work permit. To be eligible to apply, these students were required to be studying full-time for at least six of the 12 months preceding the date of their work permit application and, be in satisfactory academic standing and not be registered in general interest courses or programs that consist primarily in English or French as a second language instruction. An off campus work permit would allow 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). Since June 1, 2014, some applicants holding a study permit can qualify to work off campus without a work permit. Changes to

¹¹ Canada, CIC (2010) *Evaluation of the International Student Program*. www.cic.gc.ca/english/pdf/research-stats/2010-eval-isp-e.pdf.

¹² The complete Management Response Action Plan which includes findings from the 2010 ISP evaluation can be found in Appendix A.

¹³ A comprehensive listing of the 2014 regulatory changes can be found on CIC's website www.cic.gc.ca/english/study/study-changes.asp

¹⁴ CIC maintains a list of designated learning institutions, including those identified by provinces/territories. This list identifies educational institutions at the post-secondary level which can accept international students. Primary and secondary schools do not appear on the list as they are automatically designated through IRPR. Source: Canada, CIC (2014) *Designated Learning Institutions List*.

¹⁵ Canada, CIC (2014) *Changes to the International Student Program*

¹⁶ Canada, CIC (2014) *Compliance Monitoring*.

¹⁷ In addition to these four types, a small proportion (i.e., less than 1%) of international students also obtain work permits via other means including through the International Experience Canada program, as a spouse or common-law partner of a foreign worker, or for humanitarian reasons.

the work permit requirements included allowing international students pursuing academic, vocational or professional training program offered by a designated learning institution the ability to work off campus for up to 20 hours per week during the school year, and full time during the regularly scheduled academic breaks. International students pursuing language studies are still not eligible to work off-campus.

Co-op and Internship Programs: Prior to June 1, 2014, international students participating at a program offered by a university, college, or school (including private language schools) were eligible to apply for a Co-Op Work Permit to enable them to participate in a co-op or internship. To have been eligible, the employment component had to have formed an essential and integral part of their course of study, but not more than 50% of the total program of study. Since June 1, 2014, only international students who are pursuing academic, vocational or professional training program offered by a secondary or designated post-secondary institution can apply for a work permit if a co-op or work placement is an integral part of their course of study. In addition, international students at private language schools are no longer eligible to apply for a work permit to participate in a co-op or internship program.

Post-Graduation: The Post-Graduation Work Permit Program allows students who have graduated from a recognized Canadian post-secondary institution to gain work experience in Canada and can provide the necessary job experience required to apply for some permanent residence streams. 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 three years).

1.2.2. Partners and Stakeholders

While the Minister of Citizenship, Immigration and Multiculturalism has legislative and regulatory responsibility for immigration matters, education in Canada is the constitutional responsibility of the provinces and territories. The federal government does not have jurisdiction (or legislative authority) to regulate education or its providers. As a result, a number of partners - all with different perspectives and priorities - share responsibilities with respect to international students.

Federal responsibility concerning the administration of international education is shared across several departments in the Government of Canada. The Department of Foreign Affairs, Trade and Development is responsible for Canada's International Education Strategy (IES), which focuses on promoting Canada to international students, while CIC's International Student Program is responsible for processing applications to study in Canada. Although both departments work on the issue of international education, both departments have different programs and roles.

Department of Foreign Affairs, Trade and Development (DFATD): Key elements of DFATD's IES include developing Canada's education brand for priority markets, creating a pan-Canadian approach for the international education sector with key stakeholders, and improving collaboration between Canadian and international education and research institutes. DFATD also does international promotional activities related to international education such as international education fairs. The Strategy aims to double the number of international students by 2022.¹⁸

Citizenship and Immigration Canada: CIC holds overall policy responsibility for temporary resident processing, the review of eligibility, and travel documents of prospective international students. This is conducted through the International Student Program.

¹⁸ Canada, Department of Foreign Affairs, Trade and Development. (2014) *Harper Government Launches Comprehensive International Education Strategy*.

With regard to international students, the following stakeholders have a role:

- **Canada Border Services Agency (CBSA):** CIC and CBSA share responsibility for service delivery of study permits, and for program integrity.
- **Employment and Social Development Canada (ESDC):** ESDC is responsible for issuing Social Insurance Numbers to international students who seek to work in Canada.
- **Provinces and Territories:** Provinces and territories are responsible for ensuring the quality of education in their respective jurisdictions and also work with federal partners and educational institutions to promote Canada and its institutions internationally. In regards to the ISP, and since June 2014, provinces and territories play a role in the administration of the ISP through the designation of educational institutions eligible to host international students. Provinces and territories are also consulted on a number of program and policy issues pertaining to the ISP. Designated learning institutions, as a requirement for provincial or territorial designation, are expected to report to CIC on the enrolment status of international students.
- **Canadian Consortium for International Education:** The Canadian Consortium for International Education was formed in 2010 to enhance Canada's competitiveness and leadership in international education and works in partnership with federal, provincial and territorial governments.¹⁹ Representing the different education sectors in Canada, it is comprised of the following organizations: Canadian Bureau for International Education, Colleges and Institutes Canada, Association of Universities and College of Canada, Canadian Association of Public Schools - International, and Languages Canada. The members of the Canadian Consortium for International Education are referred to as 'the Consortium' throughout this report.
- **Educational institutions:** Educational institutions deliver provincially-approved curriculum and also work to attract and recruit international students.

1.2.3. Profile of International Students

The evaluation used CIC administrative data to develop a profile of international students in Canada. Between 2009 and 2013, 495,214 foreign nationals entered Canada with study permits (on average 99,043 per year). The demographic profile includes the following:

- Gender: Study permit holders were slightly more often male (55%) than female (45%)
- Age: Study permit holders were mainly between 18 and 25 years of age (62%)
- Level of Study: Most were studying at the university level (42%)²⁰ or at the other post-secondary level (21%)²¹
- Source Country: China and India were the most frequent source countries for students (22% and 11%, respectively)
- Province/Territory: Ontario received the largest share of students (42%), followed by British Columbia (28%) and Quebec (16%)

Additional information on international student arrivals and demographics are presented in Section 5.1.

¹⁹ Languages Canada (2012) *Canada's International Education Consortium Welcomes Panel Report*.

²⁰ University level includes bachelor, master, and doctoral levels.

²¹ Other post-secondary institutions include language institutions, private (non-public) educational institutions and university qualifying programs (not at the university or trade level). A complete description of level of study categories is presented in Section 5.1.

1.2.4. International Student Program Costs

The budget for the International Student Program is a portion of the total budget for the Temporary Resident Program (TRP), which was \$27.3M in fiscal year (FY) 2012/13.²² As the ISP allocation was not isolated from the overall TRP budget for all the years under review, the evaluation only made use of estimates from the Cost Management Model to define ISP costs.

Annual costs by fiscal year for the ISP are shown in Table 1-1.²³ These figures include the total federal processing costs for international students but do not include CIC's costs associated with policy and program development.

Table 1-1: International Student Program Costs, FY 2009/10 to 2013/14

ISP Costs	2009/10		2010/11		2011/12		2012/13		Average
CIC	\$23.76M	50%	\$26.15M	54%	\$15.27M	44%	\$13.53M	40%	\$19.68M
DFATD Locally Engaged Staff	\$3.81M	8%	\$4.08M	9%	\$3.48M	10%	\$3.46M	10%	\$3.71M
CBSA Migration Integrity Officers	\$0.17M	0%	\$0.19M	0%	\$0.11M	0%	\$0.09M	0%	\$0.14M
DFATD Other	\$13.75M	29%	\$11.21M	23%	\$9.93M	29%	\$10.47M	31%	\$11.34M
CBSA Port of Entry	\$2.74M	6%	\$3.07M	6%	\$3.42M	10%	\$3.56M	10%	\$3.20M
Other OGD	\$3.57M	7%	\$3.32M	7%	\$2.44M	7%	\$2.93M	9%	\$3.06M
Total OGD	\$24.04M	50%	\$21.86M	46%	\$19.39M	56%	\$20.50M	60%	\$21.45M
Total Cost	\$47.81M	100%	\$48.01M	100%	\$34.65M	100%	\$34.04M	100%	\$41.13M

Source: CIC Cost Management Model

These data show that annual federal cost for the ISP increased from \$47.81M in FY 2009/10 to \$48.01M in FY 2010/11, then decreased to \$34.65M in FY 2011/12 and \$34.04M in fiscal year 2012/13. Costs for the ISP are further discussed in Section 6, in relation to resource utilization.

²² Canada, CIC (2013) *Departmental Performance Report*.

²³ The costs represent full time equivalent salaries and Operations and Maintenance (O&M) associated with processing a study permit application from receipt to rendering a final decision including: initiating mandatory criminality and security checks; extensions; restoration of status; Visa Exempt Study Permit Abroad (VESPA) processing; finalizing temporary resident (“secondary”) processing initiated abroad; and efforts of other government departments (OGDs).

2. Methodology

2.1. Evaluation Scope

The scope of the evaluation was determined during the planning phase, in consultation with CIC Branches involved in the delivery of the ISP. The evaluation examined the International Student Program, as well as the use of the Off-Campus Work Permit Program and the Post-Graduation Work Permit Program. The outcomes of these work programs were not included in this evaluation.²⁴ In addition, the evaluation addressed the five core issues identified in the Treasury Board Secretariat *Directive on the Evaluation Function*.

2.1.1. Calibration

Given the requirement to evaluate the ISP to meet departmental evaluation coverage requirements, the evaluation was calibrated by:

- Limiting the methodology to three lines of evidence - key informant interviews, document review, and administrative data review;²⁵
- Focusing solely on assessing the Program's immediate expected outcomes including addressing issues identified in the previous evaluation regarding program integrity as well as application processing; and
- Conducting the evaluation in-house with a team of four evaluators and a total of 180 days allocated to complete the evaluation.

Due to the timing of the regulatory changes which took effect in 2014, the evaluation is expected to serve as a benchmark for the evaluation of the ISP planned for 2018/19. It is anticipated that the timing of the next evaluation of the ISP (scheduled for 2018/19) will allow for a complete assessment of both immediate and intermediate outcomes.

Other ongoing departmental work relating to international students also influenced the decision to scale down the evaluation. CIC is currently conducting an evaluation of the Canadian Experience Class (CEC) which is examining pathways from temporary to permanent residency of clients from 2008 to 2013 (including international students). The CEC evaluation is expected to be completed in fall 2015. As a result, the current ISP evaluation is not examining in detail this aspect of the Program. In addition, the department is conducting a review of the Post-Graduation Work Permit Program, as part of the broader Temporary Foreign Worker Program review announced by the Government of Canada in 2012. The review will present a profile of its clients from 2002 to 2013, including economic outcomes of those who transition to permanent residency, with the overall objective of assessing whether or not the program continues to advance Canada's broad economic and cultural national interest such that it continues to warrant an exemption from the Labour Market Impact Assessment process. This review is expected to be completed in Winter 2014/15.

²⁴ These outcomes will be assessed in the evaluation of the Temporary Foreign Worker Program (Labour Market Opinion exempt), which is scheduled for 2016/17.

²⁵ By comparison, the 2010 ISP Evaluation incorporated a document review, 43 interviews, 4 surveys, an administrative data review, and a literature review.

2.2. Evaluation Issues and Questions

In accordance with the requirements of the Treasury Board Secretariat *Directive on the Evaluation Function*,²⁶ the evaluation assessed the relevance and performance of the ISP from 2009 to 2013. The performance of the ISP was assessed through the following immediate expected outcomes, which is also outlined in the ISP logic model:²⁷

- Shared understanding among ISP stakeholders of roles, responsibilities and policy and program objectives and effective relationships;
- Responsive programs and policies that facilitate study and work opportunities for international students, and transition to permanent residency;
- Selection processes are timely and consistent while maintaining program integrity;
- International students arrive and study in Canada; and,
- International students gain Canadian work experience.

The evaluation questions, organized by core issues, are presented in Table 2-1.²⁸

Table 2-1: Evaluation Questions

Core Issues	Evaluation Questions	Section
RELEVANCE		
Continued Need for the Program	To what extent is there a continued need for the International Student Program?	3.1
Alignment with Government Priorities	To what extent is the International Student Program aligned with departmental and government-wide priorities?	3.2
Alignment with Federal Roles and Responsibilities	To what extent is the International Student Program aligned with federal roles and responsibilities?	3.3
PERFORMANCE		
Achievement of Expected Outcomes	Program Management Outcomes To what extent is stakeholder engagement related to the ISP effective?	4.1
	To what extent do ISP policies and programs facilitate study and work opportunities for international students? Do they facilitate transition to permanent residency?	4.2
	To what extent are international students taking advantage of work opportunities and gaining Canadian work experience?	4.2
	To what extent has CIC addressed the recommendations made in the previous evaluation related to program integrity and application processing?	4.3
	Processing Outcomes To what extent do students arrive and study in Canada?	5.1
	To what extent have selection decisions been timely and consistent? What impact have CIC's Modernization initiatives had on the ISP?	5.2-5.4
	To what extent do selection processes support program integrity?	5.5

²⁶ Canada, Treasury Board Secretariat (2009) *Directive on the Evaluation Function*.

²⁷ The logic model of the ISP can be found in Appendix C.

²⁸ See Appendix D for the complete set of evaluation questions, indicators, and methodologies.

Core Issues	Evaluation Questions	Section
Demonstration of Efficiency and Economy	To what extent are the program's resources managed effectively to facilitate the achievement of outcomes? Are costs in line with what would be expected in other similar programs?	6.1-6.2
	To what extent are there alternatives to the current design and delivery of the International Student Program that would improve efficiency or economy?	*

* Results pertaining to this evaluation question were incorporated throughout the report.

2.3. Data Collection Methods

The evaluation of the ISP included three lines of evidence which are described in greater detail, below. Data collection and analysis for this evaluation took place between February and September 2014.

2.3.1. Document Review

A review of relevant program documentation was conducted to provide both background and context of the ISP, as well as to inform the assessment of the Program's relevance and performance.

Government of Canada documents, such as Speeches from the Throne, Budgets, and policy and strategic documents were reviewed for context and for information on CIC and Government of Canada priorities. Departmental documents, including the 2010 ISP evaluation, processing manuals, and monitoring reports were used to address specific evaluation questions. Documents from other government departments were also examined to assess program relevance (e.g. DFATD documents on the International Education Strategy). Appendix B contains a bibliography of documents used in this report.

A small scale international comparison on processing times and work opportunities for international students was conducted. This comparison examined the study programs for the United States, the United Kingdom, and Australia in relation to Canada. These three countries were chosen as they are members of the Five Country Conference, and often viewed as Canada's direct competitors for international students.²⁹

2.3.2. Administrative Data Analysis

Administrative data from CIC's Global Case Management System (GCMS) and the Field Operations Support System (FOSS) was used to assess the volume of international student applications, entries, and numbers present on December 1 and develop a demographic profile of international students including information on the number, type of study permit and study temporary resident visa (TRV) applications, and the time utilized to process them. The CIC Financial Management Branch also provided four years of data on the costs of the ISP, which was used to assess the Program's resource utilization. Only four years of financial data was available for this evaluation as CIC did not conduct a Cost-Management Model exercise in FY 2008/09.

²⁹ According to the OECD, in 2012 United States received 16% of all international students, the United Kingdom received 13%, and Australia received 5%. In comparison, Canada received 5% of the world's international students. Source: OECD (2014) *Education at a Glance*.

2.3.3. Interviews

Interviews were a key line of evidence for the majority of evaluation questions. A total of 33 interviews were completed with representatives from five stakeholder groups.

Table 2-2: Completed Interviews

Response Group	Number of Interviewees
CIC Senior Management and Staff (Immigration Branch, Operational Management and Coordination, International Region)	9
Staff at CIC Regional/Local Offices, Central Processing Region, and Canadian Visa Offices Abroad involved with processing study applications ³⁰	12
Representatives from provincial governments ³¹	5
Senior management from the Canadian Consortium for International Education (CCIE) that represent more than 500 education institutions and school boards across Canada ³²	5
Representatives from other federal departments involved in the ISP (DFATD, CBSA)	2

Interviews were conducted both in-person and by telephone depending on the preference and availability of interviewees. Where qualitative information is presented in the report, the response scale shown in Table 2-3 was used.

Table 2-3: Interview Data Analysis Scale

Descriptor	Meaning
All	Findings reflect the views and opinions of 100% of the interviewees
Majority/Most	Findings reflect the views and opinions of at least 75% but less than 100% of interviewees
Many	Findings reflect the views and opinions of at least 50% but less than 75% of interviewees
Some	Findings reflect the views and opinions of at least 25% but less than 50% of interviewees
A few	Findings reflect the views and opinions of at least two respondents but less than 25% of interviewees

Limitations and Considerations

The evaluation encountered several data limitations. These, along with mitigation strategies are described in this section. It is important to note that none of the following limitations had a significant impact on the evaluation findings. As a result, data presented in support of evaluation findings should be considered reliable and evaluation findings can be used with confidence.

Limited information and reliability concerns related to data on short-term students³³—data for this population in GCMS and FOSS is only captured for visa-required countries, therefore it does not

³⁰ Regional Offices interviewed include CIC Western and Eastern Regions. Case Processing Centres included CPC-Vegreville, and the Operations Support Centre. Canadian Visa Offices included Beijing, Delhi, Riyadh, Accra, and Sao Paulo.

³¹ Provinces and territories interviewed include British Columbia, Alberta, Manitoba, Ontario, and Nova Scotia.

³² CCIE stakeholders interviewed include Canadian Bureau for International Education, Colleges and Institutes Canada, Association of Universities and College of Canada, Canadian Association of Public Schools – International, and Languages Canada.

³³ As per IRPA, foreign nationals seeking to study for less than 6 months are exempt from the requirement to apply for a study permit.

represent the full population of short-term students. In addition, the department has noted inconsistencies in coding of visas for short-term students who are study permit-exempt (e.g. sometimes coded as visitors other times as short-term students). As a result, the number of applications approved for study TRVs was used as a proxy to estimate the minimum number of this population in Canada (i.e. only visa-required countries). This data issue on short-term students did not impact the results of the evaluation, as this information was presented only to describe the number of entries and assessing the timeliness of study TRV application processing.

Limited information on processing times for certain groups of international students—processing times for change of status applications in Canada from temporary resident to international student were not available because this data is not captured in FOSS (i.e. when a visitor or worker who is already in Canada transitions to student status while still in the country). As a result, for inland processing, the evaluation was only able to obtain processing times for extensions of student status applications.

Reliability concerns for certain administrative data fields—issues surrounding the consistency of coding of Level of Study and Country of Last Permanent Residence variables were noted by the department in 2014. As a result, data under these variables are preliminary estimates and are currently being examined as part of the overall temporary resident data quality assurance exercise. While data on Field of Study is captured on the application form (applicants are asked to pick from a drop down box containing 13 options), data was not available for the evaluation as this field is not mandatory and there are currently no business rules established on grouping the options for reporting purposes.

Unavailability of data on knowledge of official languages—Until June 2014, knowledge of official languages was not captured on the study permit application form.

3. Findings: Relevance

This section discusses the findings of the evaluation concerning the continued need for the ISP, alignment with departmental and government-wide priorities, and alignment with federal roles and responsibilities.

3.1. Continued Need for the International Student Program

Finding 1: There is a continuing need to facilitate the entry of international students, as they provide economic and socio-cultural benefits to Canada.

Most interviewees and documents reviewed confirmed there is a strong continuing need for the ISP as it facilitates the entry of international students who provide economic and socio-cultural benefits to Canada.

From an economic perspective, international students are beneficial to the Canadian economy. Government of Canada publications such as the 2011 *Economic Action Plan* and DFATD *International Education Strategy* highlighted the economic benefit that students bring. For example, a 2012 DFATD report estimated that international students spent \$8 billion in 2010 while in Canada, translating into \$455 million in government tax revenue and 86,570 jobs.³⁴ In addition to citing this report, most interviewees noted that revenues from international student tuition contribute significantly to the ongoing financial health of Canada's educational institutions and Canada's ability to compete internationally in terms of their quality of education, facilities, and research activities.

In terms of socio-cultural benefits, both CIC and some provincial/territorial documentation (e.g. *British Columbia's International Education Strategy*³⁵) noted that international students increase diversity at Canadian educational institutions and in communities where they reside. Some interviewees explained that this diversity enhances the learning experience and social interaction of both Canadians and international students by fostering cultural exchanges and linkages, which can facilitate future trade relations and understanding between Canada and other countries.

Aside from the immediate benefits during their study, most interviewees expressed that there is a continuing need for international students as they may represent a source of quality candidates for filling labour shortages following their studies as well as if they transition to permanent residency. As the ISP helps individuals attain Canadian work experience, knowledge of English/French, and Canadian degrees and credentials, the Program is seen to provide international students with many key elements which are associated with successful settlement and integration in Canadian society.

Aside from these benefits, another indicator of the need for the ISP is the level of demand and use of the Program. CIC operational data indicates that both the demand for Canada as a destination for international study and the use of the ISP, continues to increase:

- The total number of student entries increased by 24% from 84,869 entries in 2009 to 111,865 in 2013

³⁴ Canada, DFATD (2012) *International Education: A Key Driver in Canada's Future Prosperity. Advisory Panel on Canada's International Education Strategy*. It is important to note that this document did not specify the nature of these jobs created (e.g., whether full-time or part time, which sectors, etc.).

³⁵ British Columbia (2012) *British Columbia's International Education Strategy*.

- The number of study permit applications increased by 17% from 120,053 study permit applications in 2009 to 144,680 in 2013.

The growth in the number of applications and entries suggests continuing use and relevance of the ISP.

3.2. Alignment with Government of Canada and CIC Priorities

Finding 2: The ISP is strongly aligned with Government of Canada and CIC priorities to strengthen the Canadian economy.

The need for international students has been articulated as a priority within various Government of Canada documents including the 2013 *Economic Action Plan* and DFATD's 2014 *International Education Strategy*.³⁶ Many interviewees also mentioned that bringing students into the country has been established as a Government priority at both the federal and provincial levels due to the economic benefits they provide.

In terms of CIC priorities, the objectives of ISP to facilitate the entry of international students is articulated in CIC's departmental planning and strategic documents, and supported by CIC's strategic objective for the Temporary Resident Program which aims 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 and protects the health, safety, and security of Canadians."³⁷

In addition, interviewees across all groups commented positively on how, during the Professional Association of Foreign Service Officers job action in 2013, study permit applications were given priority over other temporary line of business (i.e. visitors and workers) which further suggests the importance of the Program to Canada.

3.3. Alignment with Federal Roles and Responsibilities

Finding 3: The ISP aligns with federal roles and responsibilities to manage the entry of international students to Canada; however, there is also a strong role for provinces and educational institutions to play in terms of supporting program integrity.

While education is a provincial/territorial responsibility, documents reviewed support the conclusion that the ISP aligns with the Government of Canada's roles and responsibilities. As cited in the IRPA, CIC has a responsibility to "facilitate the entry of visitors, students and temporary workers for the purposes such as trade, commerce, tourism, international understanding and cultural, educational and scientific activities".³⁸

Most interviewees agreed that the ISP greatly aligns with federal roles and responsibilities with many citing the federal government's constitutional and legislated authority to determine entry into Canada.

³⁶ Canada, DFATD (2014) *Canada's International Education Strategy: Harnessing our knowledge advantage to drive innovation and prosperity*.

³⁷ Canada, CIC (2014) *Temporary Residents: Overview*.

³⁸ Canada, Department of Justice (2002) *Immigration and Refugee Protection Act*. Section 3(1)(g).

Many interviewees also recognized that education in Canada lies within provincial/territorial jurisdiction, with many stressing the importance of proper coordination between the federal government, provinces and territories, and educational institutions.

All interviewees felt that the balance of responsibilities within the ISP has been greatly improved by the new regulatory framework introduced in June 2014, which has introduced a formal role for provinces/territories in the administration of the ISP, mainly through the designation of post-secondary educational institutions eligible to host international students. These interviewees expressed that the new roles and responsibilities are appropriate given that provinces and territories have a greater capacity than CIC to make a determination on whether a particular school is genuine. In addition, these interviewees were supportive of the compliance reporting portal currently being developed by CIC to support the new regulations, as they noted that educational institutions are best placed to assess and report back to CIC on whether a student is actively pursuing studies.

4. Findings: Program Management Outcomes

This section discusses findings of the evaluation related to the effectiveness of stakeholder engagement and the extent to which CIC facilitates work opportunities and transition to permanent residency.

4.1. Stakeholder Engagement and Coordination

One of the Program's expected immediate outcomes is to ensure effective stakeholder engagement and relationships and that there is a shared understanding among ISP stakeholders of the various roles, responsibilities, and policy and program objectives. In order to assess engagement of stakeholders, the evaluation examined the extent to which mechanisms that support engagement have been effective. As interviewees external to CIC were typically only able to comment on their own organization's interaction with the department, results on engagement were organized by stakeholder group (i.e. within CIC, between CIC and other federal government departments, between CIC and provinces and territories, and between CIC and Consortium members).

4.1.1. Coordination within CIC

Finding 4: There is a need to improve coordination and internal communications to address gaps relating to: information sharing on program integrity; referral protocols between processing offices; and departmental guidance on CIC's role in supporting promotional activities.

Within CIC, several mechanisms exist to support coordination and engagement related to the ISP. In terms of policy development and operational guidance, Immigration Branch and Operational Management and Coordination Branch work closely together to manage the Program through both formal working groups and informally through ad hoc communications. These branches also work together on Federal-Provincial-Territorial Working Groups to ensure the proper design and implementation of new and existing policies, such as to develop the 2014 regulatory changes to the ISP. Most CIC interviewees felt that these mechanisms have led to a strong and effective level of engagement and coordination within the department.

Gaps in engagement mechanisms and coordination

Many interviewees expressed that there are continuing gaps in effective engagement mechanisms and coordination issues between various CIC offices that deal with processing study permit applications. Primarily, there is a lack of formalized avenues (i.e. well-defined points of contact and standardized protocols) to share information concerning program integrity between inland and overseas application processing offices. This includes information on general trends in fraud and misuse in the Program, as well as mechanisms between local CIC offices and Canadian Visa Offices Abroad to direct inquiries on specific cases. Local CIC offices and Central Processing Staff also expressed the desire to have better communication between one another in terms of the referral process.³⁹

³⁹ Among other duties, the Case Processing Centre in Vegreville (CPC-V) processes all online overseas visa-exempt and medical exempt study permit applications, as well as in-Canada paper applications for study permits and study permit extensions. Within this assessment process, CPC-V refers complex study permit/extension applications to local CIC offices (for inland applications) and to visa offices (for overseas e-applications), when there are any inadmissibility concerns.

Furthermore, CIC interviewees felt there is a lack of proper coordination and cohesive departmental approach to support promotional activities. While promotion of international education falls under the responsibility of DFATD, CIC interviewees expressed that CIC's involvement in promotional activities targeting international students (e.g. international education events) is often requested due to the need for consistent, accurate, and up-to-date information on application procedures. Staff in Canadian Visa Offices Abroad and those in Central Processing Offices spoke about their participation in promotional activities led by DFATD. These interviewees felt that there were no clear direction and guidelines in place to define the specific roles and responsibilities with regards to CIC supporting promotional activities for international students. Many CIC interviewees felt that there is a need to have clear direction and guidelines on how the department should support promotional activities, which is currently not within the mandate of CIC.

4.1.2. CIC Engagement with Other Federal Government Departments

Finding 5: There is a lack of a whole-of-government approach between federal departments regarding international students.

From 2009 to 2013, CIC engaged with other federal government departments primarily on an ad-hoc basis, especially regarding the development of the 2014 ISP regulatory amendments. However, many CIC and other government department interviewees, as well as some interviewees from other groups (Consortium members, provinces and territories), expressed that there has been a lack of a coordinated approach to dealing with international students across the federal government.

In particular, many interviewees from CIC felt that there has been a lack of coordination between CIC and DFATD on the following aspects:

- DFATD's recent goal to double the number of international students in Canada by 2022, as set out in their *International Education Strategy*, does not align with CIC's operational resource planning.
- As well, it was mentioned that DFATD's promotional efforts in "key" emerging markets tend to emphasize higher risk locations, and such planning has not necessarily taken into consideration the full impact on CIC's program integrity and timeliness of processing study applications in these locations.
- Despite additional funding to DFATD to promote Canada to prospective international students, sufficient resources have not been earmarked within CIC to provide additional support to the ensuing demand on the processing of students.⁴⁰
- It is also expected that CIC participates actively in promotion activities overseas but with the centralization of many functions and reduction of its overseas network, the department's capacity to support DFATD promotional activities at Canadian Visa Offices Abroad has also reduced.

Moreover, many CIC and CBSA interviewees noted a need to improve engagement and coordination on compliance and enforcement issues within the ISP, especially in light of new regulatory changes which require students to be actively pursuing their studies. Despite this requirement, CBSA interviewees pointed out that the mechanisms for enforcing non-compliant students as per the 2014 regulatory changes are still under development.

⁴⁰ Under the 2013 *Economic Action Plan*, DFATD received \$23 million over two years for Canada's International Education Strategy to strengthen Canada's position as a country of choice to study and conduct world-class research, whereas CIC received \$42M over two years for Temporary Resident Processing (which includes visitors, workers and students).

Some CIC interviewees also felt that there is a lack of effective engagement mechanisms with ESDC. These interviewees noted that there has been a lack of guidance and coordination in regards to students who applied for a study permit prior to the 2014 ISP regulatory changes. While some of these students are able to work off campus without a work permit, their current study permit does not specify this ability. This has created difficulties among some international students attempting to obtain a Social Insurance Number and demonstrates that there was insufficient coordination between the two departments.

Overall, interviewees from all groups felt there was a lack of a whole-of government approach to the coordination of international students.

4.1.3. CIC Engagement with Educational Institutions

Finding 6: CIC's engagement with educational institutions is effective; however, there is a need to provide educational institutions with guidance on their reporting requirements as per the 2014 regulatory changes.

While on occasion local CIC offices provide information to Canadian educational institutions concerning the ISP, CIC does not typically engage directly with educational institutions regarding program management and policy development. Instead, CIC participates in quarterly meetings with the Consortium members that represent different sectors of education in Canada. CIC and Consortium interviewees noted that between 2009 and 2013 a large focus of these meetings was on developing the 2014 regulatory changes for the ISP. CIC interviewees who could comment on engagement with educational institutions, as well as interviewees representing Consortium members, all felt that the mechanism supporting engagement between CIC and educational institutions (via Consortium organizations) has been collaborative and effective.

Some Consortium interviewees indicated that CIC could engage better by providing more frequent and detailed information to stakeholders about the Program, which would allow both provinces/territories and Consortium members to better serve institutions and students. One outstanding issue noted by the Consortium interviewees was the need for more information to be provided directly to post-secondary educational institutions regarding the compliance reporting portal (which is still under development)⁴¹ to ensure that international students are actively pursuing their studies.

4.1.4. CIC Engagement with Provinces and Territories

Finding 7: While it is sometimes difficult for provinces and territories to know where to direct complex questions regarding the ISP and their clients, the engagement with provinces and territories has been effective.

Between 2009 and 2013, CIC's primary means of engaging with provinces and territories on the ISP was through a Federal-Provincial-Territorial Working Group made up of representatives from CIC's and provincial/territorial ministries of education. Interviewees from the working group expressed that engagement mechanisms between CIC and the provinces are extremely effective, representing a model that Federal-Provincial-Territorial relations that other programs could follow. As well, many of these interviewees noted that the drafting of Memoranda of Understanding between CIC and provinces and territories as part of the 2014 regulatory amendment process has formalized the role of provinces and

⁴¹ As per CIC's website, the development of the compliance reporting portal is still ongoing at the time of this report.

territories in contributing to program integrity and helped the provinces become active partners in the Program.

Similar to comments made by Consortium interviewees, a concern regarding engagement was raised by some provincial interviewees who indicated that they, as well as educational institutions in their jurisdictions, do not know who to contact within CIC to get answers to questions related to the ISP (e.g. visa-related issues, application procedures, policies concerning international students). Interviewees explained that questions related to the ISP used to be directed through the provincial government to local CIC offices. However, due to closures of local offices, some provincial governments and educational institutions found it difficult at times to obtain this type of information.

4.2. Facilitation of Work Opportunities and Transition to Permanent Residency

In order to assess the expected immediate outcome of the ISP: "responsive programs and policies that facilitate study and work opportunities for international students and transition to permanent residency", the evaluation examined the means by which international students can work and transition to permanent residency, and the usage and efficacy of these pathways.

Finding 8: CIC policies are in place to facilitate opportunities for international students to work in Canada and transition to permanent residency, and an increasing number of international students are making use of these opportunities.

4.2.1. Work Opportunities for International Students

As described in Section 1.2.1, there are several types of work streams available to international students depending on their level of study, educational status (part-time or full-time student), and the program of study.

Aside from eligibility criteria prohibiting some international students from working, both interviewees and documents reviewed did not reveal the presence of barriers for international students accessing work. In addition, when asked whether Canada's work opportunities are adequate, most interviewees noted it was difficult to comment without information on the type of work international students are doing and their impact on the Canadian labour market.

While many interviewees and the previous ISP evaluation noted that providing work opportunities for international students acts as an important incentive to attract potential students, they were also not able to compare Canada's work opportunities for international students with competitor countries. Although an in-depth country comparison was not conducted as part of the current evaluation, a cursory review of publicly available information on competitor country websites (Australia, United States, and the United Kingdom) suggested that Canada's policies providing work opportunities for students compare favourably to the countries examined. For example, both Australia⁴² and UK⁴³ allows international students to work 20 hours per week during the school term. USA does not allow international students to work off-campus until after their first academic year; however, when students do work off-campus, it must be in their field of study.⁴⁴

⁴² Australia, Department of Immigration and Border Protection (2014) *Conditions for Working While Studying*.

⁴³ UK Council for International Student Affairs (2014) *Working during your studies*.

⁴⁴ U.S. Citizenship and Immigration Services (2014) *Students and Employment*.

While most interviewees were supportive of the 2014 regulatory changes enabling certain international students to work without a work permit, there were diverging opinions regarding whether international students at language schools should be authorized to work without a work permit while studying.

Number of international students using work programs

Administrative data shows that the number of international students with work permits in Canada during their studies has increased.⁴⁵ As shown in Table 4-1, between 2009 and 2013, the number of international students present in Canada on December 1 with both a study and work permit doubled from 40,703 in 2009 to 83,235 in 2013 (representing 21% of all international students present in 2009 and 28% of all international students present in 2013).

Table 4-1: Number and Percentage of International Students with Work Permits During their Studies, 2009-2013

International Students with Valid Status at December 1	2009		2010		2011		2012		2013		% increase from 2009 to 2013
International students holding a work permit	40,703	21%	47,772	22%	60,114	25%	70,209	26%	83,235	21%	104%
International students not holding a work permit	155,057	79%	170,110	78%	178,930	75%	195,205	74%	210,268	72%	36%
Total students	195,760		217,882		239,044		265,414		293,503		50%

Note: This figure includes international students at all study levels and data only includes foreign nationals with the primary status as students with a study permit (i.e. data does not include study-permit exempt or those with the primary status as a worker who also holds a study permit)

Source: GCMS

As shown in Table 4-2, in terms of obtaining work permits following their studies, between 2009 and 2013, there has been a doubling of the number of students who transition to foreign worker status (from 15,434 in 2009 to 31,177 in 2013). Between 2009 and 2013, nearly all (93% in 2009 and 97% in 2013) of these students took advantage of the Post-Graduation Work Program (which does not require a Labour Market Opinion/Labour Market Impact Assessment). The remaining few (7% in 2009 and 3% in 2013) transitioned to other streams within CIC's Temporary Foreign Worker Program.

Table 4-2: Number and Percentage of International Students with Work Permits in the Year Directly Following their Studies, 2009-2013

Previous Yearly Status as International Students now Workers with Valid Status at December 1	2009		2010		2011		2012		2013		% increase from 2009 to 2013
Post-Graduation Work Program	14,314	93%	14,830	97%	18,062	97%	24,151	97%	30,118	97%	110%
Temporary Foreign Worker Program	1,120	7%	520	3%	583	3%	752	3%	1,059	3%	-5%
Total	15,434		15,350		18,645		24,903		31,177		102%

Note: Data only includes previous students with a study permit (i.e. data does not include previous study-permit exempt students)

Source: GCMS

⁴⁵ It is not possible to know the extent to which these students were actually working due to the absence of data.

4.2.2. Transitioning to Permanent Residency

The ISP facilitates the transition to permanent residency by providing some international students with avenues to gain work experience (e.g., through the Post-Graduation Work Permit Program) and qualifications which can act as an advantage or is required for applying under several of CIC's immigration programs. International students can gain additional points as a Federal Skilled Worker⁴⁶, can apply under a specific student streams within CIC's Provincial Nominee Program, and can apply for permanent residency through the Canadian Experience Class.⁴⁷

Number of students transitioning to permanent residency

Administrative data presented in Table 4-3 indicates that the number of international students that transitioned to permanent residency has increased by 20.9% from 2009 to 2013 (from 18,544 to 22,421, respectively).⁴⁸

Table 4-3: Number of International Students Transitioning to Permanent Residency by Immigration Classes, 2009-2013

Transitions of International Students to Permanent Residency	2009	2010	2011	2012	2013	% increase from 2009 to 2013
Total Family Class	3,133	2,393	2,517	3,055	3,827	22%
Economic Class						
Skilled workers - principal applicants	5,976	5,560	3,206	4,252	4,669	-22%
Skilled workers - spouses/dependents	2,389	2,110	1,300	1,738	1,496	-37%
CEC - principal applicants	1,275	1,535	2,435	3,474	2,463	93%
CEC - spouses/dependents	297	344	572	845	656	121%
PT Nominees - principal applicants	1,578	1,173	1,340	2,910	5,480	247%
PT Nominees - spouses/dependents	1,779	1,743	1,567	1,779	2,197	23%
Other economic	919	1,104	911	837	801	-13%
Total Economic Class	14,213	13,569	11,331	15,835	17,762	25%
Other	1,198	916	1,077	932	832	-31%
Total	18,544	16,878	14,925	19,822	22,421	21%

Note: Data from this table represents the number of foreign nationals who have ever held student status

Source: GCMS

In terms of the transitions to permanent residency, the majority came through economic immigration classes, with the Provincial Nominee Program and Federal Skilled Worker transitions accounting for almost 62% of former student transitions in 2013. The Canadian Experience Class, which was designed as an avenue for student transitions, accounted for roughly 14% of all former student transitions.

4.2.3. Program Issues, Data Gaps and Unintended Impacts

Finding 9: Some program issues and data gaps were identified through the evaluation.

⁴⁶ In addition, in November 2011 CIC created an additional stream under the Federal Skilled Worker Program for international PhD students who wish to become permanent residents of Canada.

⁴⁷ Although the specific student stream was closed in 2013, international students can still apply for permanent residency through the Canadian Experience Class if they have one year of qualifying work experience.

⁴⁸ This figure represents the number of foreign nationals who have ever held student status.

As the policy context surrounding international students has evolved and given the recent changes to the ISP, several data and program issues emerged, as identified by some key informants and documents, suggesting there may be an opportunity for CIC review its program priorities and objectives.

Program and Policy Issues

Both interviewees and documents identified some inconsistencies with respect to program objectives regarding the selection and retention of international students, as well as application processing of minor students (including the vetting of custodians).

CIC's current policy objectives related to international students are formalized in IRPA and are focused on the facilitation of international students to Canada, contingent upon applicants meeting admissibility requirements. As international students are selected by educational institutions based on their own criteria and according to their policies, the ISP is demand-driven and the CIC role is limited to processing applications of those students who have been accepted to study in Canada, while ensuring admissibility requirements are met.

However, some reports⁴⁹ and some interviewees noted that Canada is seeking to attract the 'best and brightest' international talent. As CIC's current policy objectives regarding international students are responsive in nature, they are geared towards facilitating entry into Canada for those foreign nationals who have a genuine interest in obtaining a Canadian education. Educational institutions are responsible for the attraction, recruitment, and selection of qualified international students, while DFATD also engages in recruitment and promotion. In addition to the desire to attract the best and brightest international students, Canada's International Education Strategy (DFATD-led) also has an objective of doubling the number of international students in Canada by 2022, for which CIC has the responsibility of processing applications submitted. Nevertheless, concerns were raised by some CIC interviewees who noted that continually increasing the number of foreign nationals applying to study in Canada could affect CIC's capacity to process applications, which may in turn affect processing times. Another point that was raised was the potential impact of doubling the number and providing some applicants with the ability to work off campus without a work permit may impact Canadians' access to employment and study opportunities.

A second point that was raised by a few interviewees from CIC in regard to the selection of ideal ISP candidates was that more could be done to actively promote and provide information to ideal international student candidates on ways to transition to permanent residency. Additionally, some interviewees (from CIC and Provinces), as well as a few reports, suggested that the number of international students actually transitioning to permanent residency has been low.⁵⁰ Despite these perceptions, CIC does not currently have targets for the number of international students it would like to transition to permanent resident status but rather sets targets for various permanent residence streams/programs. The Government of Canada recognizes the benefits both to having international students stay on in Canada permanently after their studies, as well as return home. Several interviewees noted that while Canada can and should continue to benefit from both cases, neither CIC nor DFATD have attempted to quantify the relative benefits gained when an international student decides to stay or decides to return home after their studies.

⁴⁹ Canada, DFATD (2012) *International Education: A Key Driver in Canada's Future Prosperity. Advisory Panel on Canada's International Education Strategy*; Canada, Canada Gazette (2014) *Regulations Amending the Immigration and Refugee Protection Regulations*; Canada, CIC. *Post Graduation Work Permit Pilot Review: British Columbia*.

⁵⁰ Axiom Consultants Inc. (2012) *International Students in Ottawa*; Canada, CIC (2011) *A profile of foreign students who transition to permanent resident status in Atlantic Canada*.

It is clear that various objectives exist in relation to international students - some that would support a facilitative role by CIC and others that highlight a perceived need for international student selection and the potential for CIC to identify the number and type of international students in Canada. The numerous players that inform the policy context for international students each have competing interests and objectives, some of which are supported by CIC's current facilitative approach, and some of which may require CIC to play a stronger role. In light of this, there may be a need to further examine the relative benefits of international students working and transitioning versus international students returning to their home country; and, review the policy alignment between the ISP and CIC's other temporary and permanent resident programs as well as DFATD's objectives under the International Education Strategy.

The evaluation also found potential gaps in current policies related to minors⁵¹, which in 2013 represented 25% of international students⁵². Regarding minors, internal documents reviewed indicated that there have been inconsistencies between CIC and CBSA regarding their respective application of the IRPA and its regulations with respect to issuing study permits to minors.⁵³ In addition, a few interviewees from CIC noted that the appropriate duration of visas and study permits that should be issued to minor children (e.g. for one year or to the end of their secondary education) is unclear.

Regarding custodianship⁵⁴, an internal CIC report produced as part of a Study Permit Network Exercise conducted in 2012-13 indicated, "custodians do not appear to be documented in a consistent manner in GCMS. In fact, some offices do not record custodians at all, as a common practice." In addition, a few interviewees from CIC indicated concern that officers are not in a position to properly vet custodians.

A few interviewees suggested that, given the vulnerability of unaccompanied minors, CIC should consider tightening controls regarding the number of minors one custodian can oversee as well as regarding the nature of the relationship between a custodian and a minor.

4.3. Addressing Issues Identified in the Previous ISP Evaluation

The 2010 ISP Evaluation noted several issues affecting the ISP, which were regrouped into two themes: program integrity and application processing.⁵⁵ While this section presents evidence on what has been done to assess these issues, performance related to the application processing and program integrity are addressed separately in Sections 5.2 and 5.5.

⁵¹ Minor children are deemed to be anyone under the age of majority at the time of their arrival in Canada. The age of majority is 18 in Alberta, Manitoba, PEI, Quebec, and Saskatchewan. The age of majority is 19 in BC, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nunavut, and Yukon. Source: Canada CIC (2014) *Study Permits: Guidelines on Minor Children*.

⁵² GCMS data indicated that in 2013, there were 28,371 international students under the age of 17.

⁵³ In order to study in Canada, foreign nationals, including minor children, must apply for a study permit before entering Canada, as per R213 in the *Immigration and Refugee Protection Regulations*. The *Immigration and Refugee Protection Act* provides for certain exemptions from this requirement. Section 30(2), for example, authorizes every minor child in Canada to study without a study permit, provided they are the child of a temporary resident authorized to work or study in Canada.

⁵⁴ Custodians are required for unaccompanied minors as they are deemed inadmissible for financial reasons because they are unable to support themselves. As a result, adequate arrangements must be in place for the care and support of the minor child while in Canada and immigration officers must be satisfied that adequate arrangements are in place for the care and support of the child while in Canada. Canada, CIC (2014) *Study Permits: Guidelines on Minor Children*.

⁵⁵ The complete Management Response Action Plan from the 2010 ISP evaluation which includes findings can be found in Appendix A.

Finding 10: CIC has taken measures to address issues identified in the previous evaluation related to program integrity and application processing, primarily by creating lists of designated educational institutions, requiring international students to be actively pursuing their studies and through the implementation of initiatives to modernize its processing network.

4.3.1. Application Processing

Since the previous evaluation, in 2011 CIC introduced service standards to process 80% of study permit applications in 60 days and 80% of TRV applications within 14 days. In addition, in response to the finding from the 2010 ISP evaluation that 65% of study permit applications were completed within 28 days, CIC committed to review potential options for streamlining application procedures, and further reduce processing times, where feasible.

Between 2009 and 2013, CIC has implemented various initiatives to modernize its application processing network under the *Managing the Workload Pillar* of the C-50 Modernization Initiative. These initiatives, which have affected processing for both temporary (including study permit) and permanent applications include e-applications, e-medicals, risk triaging low risk files, centralization of application processing, distribution of work across offices, creation of Visa Application Centres (VAC), and utilizing Temporary Duty assignments during peak periods.⁵⁶

Some of these initiatives were designed to make it easier for applicants to apply for study permits. These initiatives include e-applications and MyCIC accounts, which are self-serve online methods of applying for study permits and allow an applicant to monitor the progress of their application.⁵⁷ In addition, Visa Application Centres were also created to allow for more points of service closer to the homes of applicants and to ensure that applications being submitted were complete.

From the CIC processing perspective, GCMS allowed for documents to be processed electronically at any Canadian Visa Office around the world. As a result, this allowed for the Centralized Processing Centres to triage files. For example, beginning in May 2011, student applicants from 14 designated countries were able to submit their application online through the Visa Exempt Study Permit Abroad Electronic Application Service. Online tools such as e-medicals were also introduced as a way for Immigration Medical Exam results to be electronically sent to CIC.⁵⁸

The impact of e-applications and Visa Application Centres and their effect on processing times for student applications are discussed further in Section 6.3.

4.3.2. Program Integrity

The 2010 ISP evaluation found that CIC's policy framework and gaps in program design left the ISP vulnerable to potential misuse (i.e. at that time there was no legislative requirement for international students to study once they were in Canada and CIC did not have a complete list of legitimate educational institutions in Canada). It was also noted that in the absence of data and consistent reporting on fraud and misuse, it was difficult to determine the extent of the problem and related implications for program integrity.

⁵⁶ While not all of these initiatives were a part of the C-50 Modernization Initiative (e.g. VAC), they still impacted the ISP in terms of processing.

⁵⁷ Canada, CIC (2012) *Notice – Modernizing our processing network*.

⁵⁸ Canada, CIC (2014) *Glossary*.

Between 2009 and 2014, CIC has implemented a number of changes to strengthen program integrity, most notably through the 2014 regulations for the ISP.⁵⁹ The regulation changes were made with the intention of "protecting Canada's international reputation for high-quality education and improving services to genuine students."⁶⁰ As a result, the goal of these changes was to reduce potential fraud and misuse within the ISP.

The regulatory changes introduced three key changes to the ISP: 1) CIC to only issue study permits to applicants enrolled at designated learning institutions; 2) to require students to enrol and actively pursue their studies at a designated learning institution; 3) to streamline work programs available to international students.

As of June 1st 2014, all provinces and territories, with the exception of Nunavut, have implemented a designated learning institution list which contains the provincially/territorially approved post-secondary institutions allowed to host international students. In order for an international student to receive a study permit from CIC, they must have a letter of acceptance from a designated learning institution, a list of which is available on CIC's website.

Under the new ISP regulations, international students are required to be actively pursuing studies. Actively pursuing studies includes being enrolled and making reasonable and timely progress towards the completion of their study program. Reporting on this requirement will be done by educational institutions (outside of Quebec) directly to CIC.

An assessment of ISP performance associated with program integrity is discussed further in Section 5.5.

⁵⁹ Canada, CIC (2014) *Changes to the International Student Program*.

⁶⁰ Ibid.

5. Findings: Processing Outcomes

This section discusses findings of the evaluation related to the effectiveness of international student application processing and the impact of related modernization initiatives.

5.1. Student Entries

Finding 11: Between 2009 and 2013, the number of international students in Canada increased by approximately one third.

As illustrated in Table 5-1, both the numbers of student entries and those present in the country⁶¹ have increased. Between 2009 and 2013, the number of foreign nationals with study permits entering Canada has increased by roughly 32% (from 84,869 to 111,865).⁶² Over the same period, the number of foreign nationals with valid study permits in Canada on December 1 has increased by nearly 50% (from 195,760 to 293,503).⁶³ Data on short-term students (only from visa-required countries) shows that the number of study TRVs issued has remained relatively constant at around 37,000 per year.⁶⁴

Table 5-1: Student Entries and Number Present at December 1, Study TRVs Approved

Number of International Student Entries, Present and Study TRVs approved						% increase from 2009 to 2013	Annual Average
	2009	2010	2011	2012	2013		
Entries (study permits)	84,869	95,256	98,394	104,830	111,865	31.8%	99,043
Present on December 1 (study permits)	195,760	217,882	239,044	265,414	293,503	49.9%	242,321
Study TRVs approved	-	-	37,854	36,097	37,955	0.0%	37,302

Source: GCMS and FOSS

Table 5-2 presents a demographic profile of international students entering with study permits between 2009 and 2013. Key trends include the following:

- **Gender:** The proportion of male and female students remained relatively constant (male students outnumbered female students by 10% to 12% depending on the year).
- **Age:** The largest age group was 18 to 25, accounting for just over 60% of all international student entries per year.
- **Level of Study⁶⁵:** University level students accounted for between 40% to 46% of all international student entries. The proportion of students studying at secondary or lower level remained relatively

⁶¹ On December 1st of each year

⁶² This figure includes both initial entries and re-entries.

⁶³ The growth in stock over the 5 year period is not necessarily a reflection of increases in the number of foreign nationals with study permits actually in Canada, given that this data counts the number of valid study permits on December 1 and not the number of international students actually in the country.

⁶⁴ As noted in Section 2.4, data on this population is only available for countries where visas are required. In addition, some visa offices reportedly do not always code short-term study visas (SX-1) as students but instead as visitors, thus possibly under representing the total population.

⁶⁵ Secondary or less includes primary (elementary) or secondary (junior high and high school) educational institutions in Canada. Trade includes vocational trade at non-university educational institutions in Canada (such as technical and vocational institutions, CEGEPs and colleges). University includes undergraduate, postgraduate (master's and doctoral) and other studies at university institutions in Canada. Other post-secondary includes post-secondary level of study, not at the university or trade level, including language institutions, private institutions and university qualifying programs. Other

constant and ranged between 21% and 23% of all student entries. Students designated at the "other post-secondary" level, who are within language institutions, private (non-public) educational institutions, and university qualifying programs increased significantly from 14% in 2009 to 23% in 2013. Conversely, trade students decreased as a share of student entries from 11% in 2009 to 3% in 2014.

- **Source Country**⁶⁶: China has consistently been the top source country for international student entries into Canada and has seen its share rise from 19% in 2009 to 26% of all international student entries (in 2013) which is more than double that of India, which was the next highest source country in 2013 (12%). Following India, the next highest source countries were Korea (decreased its share from 13% in 2009 to 9% in 2013), France (remained constant at 6% from 2009 to 2013) and Saudi Arabia (decreased from 6% in 2009 to 5% in 2013).
- **Province/Territory**: In 2013, a total of 95,107 international students were located in Ontario, BC, and Quebec, representing 85% of all international student entries for that year. Between 2009 and 2013, Ontario saw its share of international students increase from 36% to 44%. Conversely, British Columbia saw its share of international students reduced from 31% in 2009 to 25%. The share of international students in other provinces and territories remained relatively constant and varied by 1% to 2% per year.
- **Cities**: Toronto, Montreal, and Vancouver represent by far the largest proportion of student entries when compared to other major Canadian cities (58% of all student entries in 2009 and 54% in 2013). Between 2009 and 2013, Toronto increased its share of international students from 21% to 27%, Montreal remained constant at 13% and Vancouver decreased from 24% to 14%.

includes international students not classified in any of the aforementioned levels of study. As previously noted in Section 2.4, there are reliability concerns regarding this variable and as a result, statistics should be considered as estimates only.

⁶⁶ Source country is defined as the country of last permanent residence. As previously noted in Section 2.4, there are reliability concerns regarding this variable and as a result, should be considered as estimates only.

Table 5-2: Demographic Profile of Student Entries, 2009-2013

Characteristics	2009		2010		2011		2012		2013		Total	
Gender												
Male	47,438	56%	53,622	56%	54,668	56%	57,765	55%	61,212	55%	274,705	55%
Female	37,426	44%	41,632	44%	43,725	44%	47,064	45%	50,651	45%	220,498	45%
Not stated	5	0%	2	0%	1	0%	1	0%	2	0%	11	0%
Total	84,869	100%	95,256	100%	98,394	100%	104,830	100%	111,865	100%	495,214	100%
Age												
0 to 17 years of age	19,869	23%	21,588	23%	22,830	23%	25,893	25%	28,371	25%	118,551	24%
18 to 25 years of age	52,925	62%	60,283	63%	62,298	63%	64,752	62%	66,717	60%	306,975	62%
26 to 33 years of age	9,677	11%	10,821	11%	10,787	11%	11,346	11%	13,251	12%	55,882	11%
34 years of age or older	2,397	3%	2,563	3%	2,479	3%	2,839	3%	3,526	3%	13,804	3%
Not stated	1	0%	1	0%	0	0%	0	0%	0	0%	2	0%
Total	84,869	100%	95,256	100%	98,394	100%	104,830	100%	111,865	100%	495,214	100%
Level of Study												
Secondary or less	18,287	22%	19,773	21%	21,216	22%	23,844	23%	25,343	23%	108,463	22%
Trade	9,759	11%	10,469	11%	8,112	8%	5,830	6%	3,910	3%	38,080	8%
University	38,881	46%	40,333	42%	42,343	43%	44,394	42%	44,420	40%	210,371	42%
Other post-secondary	11,867	14%	17,308	18%	20,692	21%	24,291	23%	29,444	26%	103,602	21%
Other	6,067	7%	7,363	8%	6,016	6%	6,459	6%	8,430	8%	34,335	7%
Not stated	8	0%	10	0%	15	0%	12	0%	318	0%	363	0%
Total	84,869	100%	95,256	100%	98,394	100%	104,830	100%	111,865	100%	495,214	100%
Source country (Country of Last Permanent Residence)												
People's Republic of China	16,373	19%	17,727	19%	21,821	22%	25,353	24%	28,940	26%	110,214	22%
India	5,703	7%	11,778	12%	12,115	12%	13,141	13%	12,976	12%	55,713	11%
Republic of Korea	11,014	13%	10,455	11%	8,187	8%	7,223	7%	6,947	6%	43,826	9%
France	5,317	6%	5,603	6%	5,271	5%	5,801	6%	6,411	6%	28,403	6%
United States of America	4,759	6%	4,765	5%	5,112	5%	4,787	5%	4,539	4%	23,962	5%
Saudi Arabia	5,281	6%	6,924	7%	5,651	6%	4,481	4%	4,457	4%	26,794	5%
Japan	3,313	4%	3,238	3%	3,561	4%	3,951	4%	3,987	4%	18,050	4%
Mexico	2,753	3%	2,930	3%	3,005	3%	3,378	3%	3,552	3%	15,618	3%
Brazil	1,733	2%	1,798	2%	1,910	2%	2,296	2%	2,417	2%	10,154	2%
Nigeria	804	1%	1,109	1%	1,295	1%	1,635	2%	2,256	2%	7,099	1%
Germany	2,327	3%	2,442	3%	1,968	2%	2,047	2%	1,758	2%	10,542	2%
United Kingdom	1,396	2%	1,210	1%	1,194	1%	1,291	1%	1,426	1%	6,517	1%
Hong Kong	1,006	1%	1,046	1%	997	1%	1,070	1%	1,044	1%	5,163	1%
Taiwan	1,359	2%	1,276	1%	915	1%	827	1%	861	1%	5,238	1%
Other countries	21,731	26%	22,955	24%	25,392	26%	27,549	26%	30,294	27%	127,921	26%
Total	84,869	100%	95,256	100%	98,394	100%	104,830	100%	111,865	100%	495,214	100%

Characteristics	2009		2010		2011		2012		2013		Total	
Province or Territory												
Territories	23	0%	26	0%	33	0%	26	0%	33	0%	141	0%
Prince Edward Island	324	0%	255	0%	241	0%	273	0%	337	0%	1,430	0%
Newfoundland and Labrador												
Labrador	527	1%	540	1%	488	0%	643	1%	608	1%	2,806	1%
New Brunswick	1,412	2%	1,381	1%	1,208	1%	1,252	1%	1,247	1%	6,500	1%
Saskatchewan	1,456	2%	1,410	1%	1,146	1%	1,618	2%	1,838	2%	7,468	2%
Manitoba	2,047	2%	2,088	2%	1,772	2%	2,636	3%	2,782	2%	11,325	2%
Nova Scotia	2,601	3%	3,351	4%	2,900	3%	3,175	3%	2,845	3%	14,872	3%
Alberta	5,511	6%	5,641	6%	4,914	5%	6,344	6%	6,730	6%	29,140	6%
Quebec	14,052	17%	14,418	15%	14,689	15%	16,777	16%	17,398	16%	77,334	16%
British Columbia	26,483	31%	27,278	29%	29,572	30%	26,652	25%	28,400	25%	138,385	28%
Ontario	30,431	36%	38,862	41%	41,427	42%	45,428	43%	49,309	44%	205,457	41%
Not stated	2	0%	6	0%	4	0%	6	0%	338	0%	356	0%
Total	84,869	100%	95,256	100%	98,394	100%	104,830	100%	111,865	100%	495,214	100%
Census Metropolitan Area (CMA)												
Toronto	18,238	21%	25,112	26%	26,935	27%	28,346	27%	30,427	27%	129,058	26%
Vancouver	20,101	24%	20,341	21%	24,399	25%	14,680	14%	14,737	13%	94,258	19%
Montréal	11,312	13%	11,425	12%	11,689	12%	13,488	13%	13,940	12%	61,854	12%
Windsor	621	1%	661	1%	883	1%	2,386	2%	3,809	3%	8,360	2%
Ottawa - Gatineau	2,339	3%	2,927	3%	2,656	3%	3,069	3%	3,144	3%	14,135	3%
Edmonton	2,204	3%	2,197	2%	1,858	2%	2,509	2%	2,681	2%	11,449	2%
Calgary	2,346	3%	2,402	3%	2,040	2%	2,100	2%	2,264	2%	11,152	2%
Winnipeg	1,704	2%	1,776	2%	1,551	2%	2,130	2%	2,250	2%	9,411	2%
London	1,428	2%	1,650	2%	1,913	2%	1,854	2%	1,966	2%	8,811	2%
Halifax	1,867	2%	2,315	2%	2,020	2%	2,138	2%	1,944	2%	10,284	2%
Hamilton	1,690	2%	1,876	2%	2,123	2%	2,038	2%	1,762	2%	9,489	2%
Québec	1,030	1%	1,131	1%	1,173	1%	1,180	1%	1,259	1%	5,773	1%
Other CMA	19,989	24%	21,443	23%	19,154	19%	28,912	28%	31,682	28%	121,180	24%
Total	84,869	100%	95,256	100%	98,394	100%	104,830	100%	111,865	100%	495,214	100%

Source: GCMS and FOSS

5.2. Timeliness of Application Processing

Finding 12: Since the previous evaluation, processing times have increased for both study permit applications and study TRVs. While CIC is meeting its service standard for study permits, it is not meeting its service standard for study TRVs.

Data on processing times, from 2009 to 2013 displayed in Table 5-3 indicate that since 2011 CIC has been meeting its service standard for study permits but not for study TRVs. However, the average overall processing time for 80% of new study permit applications increased by 26% - from 38 days in 2009 to 48 days in 2013, while the average overall processing time for 80% of study TRVs has increased from 8 days in 2009 to 19 days in 2013.

It is important to note that the data presented in this section is the global average for study permits and study TRVs. The variability of processing times across CIC's network is discussed later in Section 5.2.2. In addition, between 2009 and 2013, processing times were affected by external factors such as the closure of several visa offices abroad (which meant transferring some files across CIC's processing network) as well as the 2013 Professional Association of Foreign Service Officers labour dispute which

meant that the distribution of work between permanent and temporary resident lines of business (including study permits and study TRVs) shifted.

Table 5-3: Processing Times for 80% of Study Permits and Study TRV Applications, 2009-2013

Processing time (in calendar days) for 80% of decisions on new study permit and study TRV applications	2009	2010	2011	2012	2013	% increase from 2009 to 2013
Permis d'études (norme de services : 60 jours civils)	38	34	38	42	48	26%
VRT pour études (norme de services : 14 jours civils)	8	12	17	16	19	138%

Source : SMGC

When asked to what extent interviewees felt student applications are processed in a timely manner, most CIC staff felt that it is currently timely, stating that CIC is generally meeting its processing standards for most applications. Overall, CIC interviewees noted that tools and systems, and procedures are in place (i.e. operational manuals, e-applications, and GCMS) to ensure timely decision-making.

While noting that the department is meeting its service standard for study permits, CIC interviewees mentioned several issues which can slow down application processing for international students:

- as noted in Section 4.1.1, referrals from CPC-V to local CIC offices do not specify the reason for referral, so local CIC offices must explore the whole application;
- peak periods can be unpredictable in intensity and make it difficult to staff appropriately; and,
- if documents submitted along with the application form are incomplete, processing of the application cannot be initiated and officers will return the application and documents to the client with a written request for the missing information. Hence, delays from institutions in issuing their letters of acceptance or applicants and/or applicants not submitting necessary documents or medicals contribute to delays in processing.

The perspective of other government departments, provinces and territories, and Consortium interviewees concerning timeliness did not focus on CIC's ability to meet departmental business standards but rather compared Canada's processing time with other countries. Most of these interviewees felt that Canada is still lagging behind other competitor countries in terms of the length in processing time, which reduces the competitiveness of Canada's ISP. Moreover, a report produced from the Australian government in 2011 which examined surveys results from international education agents, suggested that Canada is among the slowest in terms of processing time.⁶⁷

In addition, processing time data across different offices in the CIC network indicates that on average, offices which served clients requiring biometrics took longer to process study permit applications than offices which serve biometric-exempt clients (60 days versus 45 days in 2013).

5.2.1. Comparison of Processing Time with Competitor Countries

While a full assessment of the ISP in terms of global competitiveness was not within the scope of the evaluation, a review of published processing times from select competitor countries was conducted to

⁶⁷ Australian Government (2011) *Strategic Review of the Student Visa Program 2011*.

substantiate interviewee perceptions on the timeliness of CIC application processing.⁶⁸ In comparing the publicly available student visa processing times for Canada, the United States, and the United Kingdom,⁶⁹ Canada has the longest processing time out of the three.

The United States specifies on their website both wait times before getting an interview and an additional wait time for processing. The United States' processing times (combined average appointment and processing wait time) were significantly faster than Canada and the United Kingdom, with an average of 5 working days.

The United Kingdom has longer processing times than the United States. However, as indicated through the United Kingdom's publicly available processing times, 80% of Points Based System Tier 4 (equivalent to Canada's Study Permit) applications take 15 days to process. This is in comparison to Canada's processing time for 80% of its applications, which takes an average of 38 working days.

As noted in the 2010 ISP evaluation, longer processing times can negatively impact Canada's competitiveness.

5.2.2. Variability of Processing Times

Similar to the finding in the 2010 ISP evaluation, there continues to be variability in processing times of study permits across the CIC network.

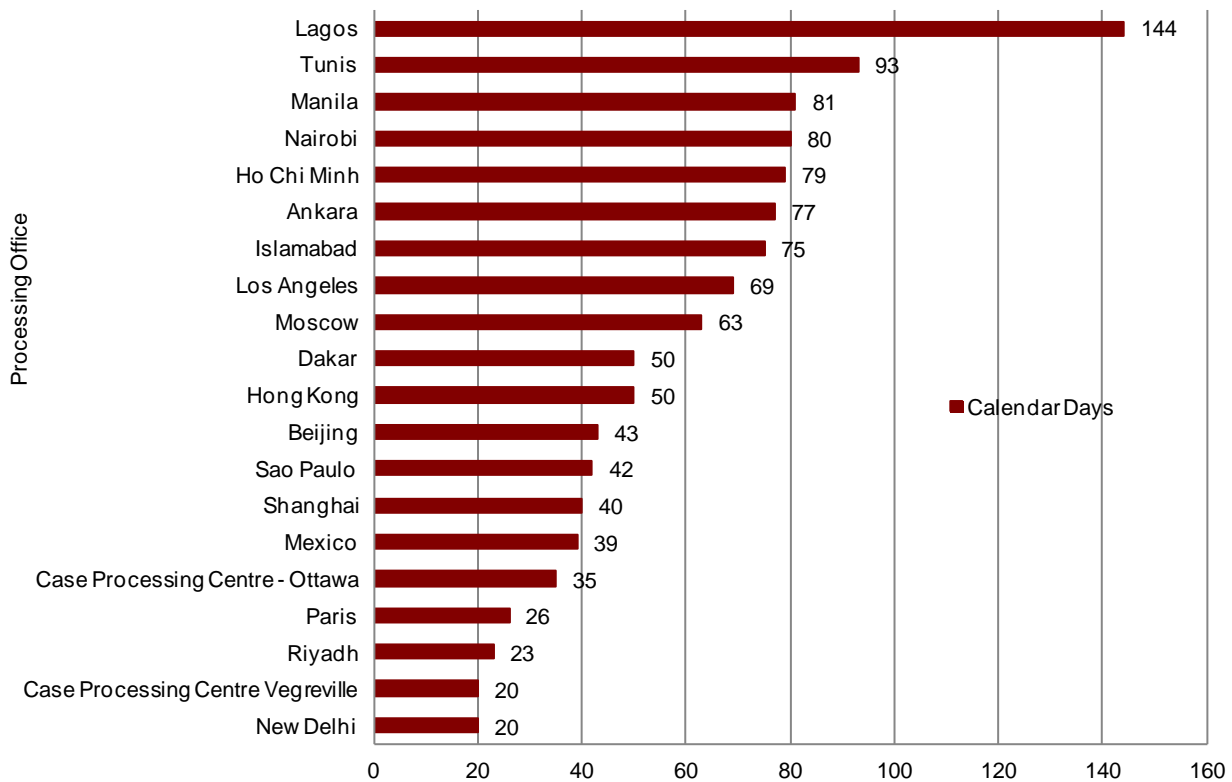
As demonstrated in Figure 5.1, the processing time for study permit applications varied significantly depending on Canadian Visa Office. The processing time ranged from 20 days to 144 days for the processing of 80% of all study permit applications.⁷⁰

⁶⁸ This analysis only considered published processing times and did not account for differences in application processes by country.

⁶⁹ Publicly available processing times broken down by visa office were not available for Australia.

⁷⁰ Figure 5.1 presents only the top 20 processing offices in 2013.

Figure 5-1: Processing Times for Study Permit Applications by CIC Office, 2013



Source: GCMS

When asked to comment on the variability of processing times across CIC's network, most CIC interviewees noted that variability is reasonable in light of regional and country-specific contexts which involve additional program integrity risks (e.g. background checks for applications from certain higher risk countries can take up a lot of time). A few CIC interviewees also suggested that there are sometimes misalignments between volumes and resources Canadian Visa Offices receive to process study permit applications, which can be another cause for variability. These interviewees felt this is the case more often in smaller offices.

5.3. Impact of Modernization Initiatives

Some data was available to measure the impact of two key modernization initiatives introduced to improve processing times for visa applications impacting ISP: e-applications and Visa Application Centres. The impacts of these two initiatives for ISP are described below. In addition to application method (paper, e-application, Visa Application Centre), it is important to note that there may be other factors which influence timeliness (e.g., if certain Canadian Visa Offices prioritize the processing of study permits over study TRVs or whether the processing of e-applications are prioritized over paper, etc.). In addition, as both e-applications and the use of Visa Application Centres are relatively new to the department, they may have taken time to implement fully and seamlessly across CIC's processing network.

Finding 13: Early modernization-related findings suggest mixed results regarding the impact of modernization initiatives on the timeliness of application processing. Compared to paper applications, e-applications and Visa Application Centres seem to represent faster processing methods for study permits; however, this is not the case for study TRVs.

Data on processing times by application method (e-application, Visa Application Centres, and paper) demonstrates mixed results. As outlined in Table 5-4, faster processing times are associated with e-applications and usage of Visa Application Centres for study permit applications. For example, for study permit applications processed in 2013, the average time for e-applications, Visa Application Centres, and paper was 43, 45, and 64 days, respectively. However, data on study TRVs from 2013 indicate that e-applications and Visa Application Centres represent slower processing times than paper. Another concern is that the timeliness of application processing for Visa Application Centres has increased for both study permits and study TRVs in each year.

Table 5-4: Processing Times for 80% of Study Permits and Study TRV Applications by Application Method, 2009-2013

Processing time (in calendar days) for 80% of decisions on new study permit applications (study TRV applications)	2009		2010		2011		2012		2013		Average	
	Study Permit	Study TRV	Study Permit	Study TRV	Study Permit	Study TRV	Study Permit	Study TRV	Study Permit	Study TRV	Study Permit	Study TRV
E-applications	-	-	-	-	-	-	-	-	43	19	43	19
Paper	38	8	34	12	45	20	50	14	64	17	46	14
Visa Application Centres	-	-	-	-	27	15	36	17	45	19	36	17
Total	38	8	34	12	38	17	42	16	48	19	40	14

Note: Data on Visa Application Centres was only available starting in 2011 and data for e-applications was only available for 2013
Source: GCMS

While CIC interviewees reflected positively on the overall impact of modernization, they also provided observations regarding specific modernization initiatives:

- All interviewees were positive about GCMS and how it has facilitated the electronic movement of files across the CIC network.
- Most CIC interviewees explained that e-applications are good from a client service perspective in that they seem to be leading to overall reduced processing times. However, some officers noted that processing these applications can be more time consuming as a result of slow connection speeds or other technical issues.
- Most interviewees mentioned that e-medicals created savings and improved timeliness of application processing.
- Some interviewees mentioned centralization of low risk files as having a positive impact on timeliness allowing overseas officers to focus on higher risk files.
- All CIC interviewees agreed that Visa Application Centres were useful, noting that they ensure applications are complete and seem to be leading to reduced processing times.

5.4. Consistency of Decision-making

In order to assess the consistency of decision making, the evaluation examined the extent to which mechanisms and tools exist to support decision making and the approval and refusal rates for study permits over time.

Finding 14: There is consistent decision-making on study permit applications.

In 2012-2013, CIC's Program Integrity Division conducted a Study Permit Network Exercise which found that independent monitors agreed with 96.4% of overseas decisions, 98.4% of CPC-V decisions and 91.4% of local CIC office decisions for study permit applications and concluded that decisions for study permits have been made in a consistent manner across the various CIC regions.

A review of documentation found that several mechanisms and tools for promoting consistency are in place including training programs for processing officers as well as manuals and other supports (e.g. templates, letters, systems, webcart, wiki, CIC website, Operational Bulletins).

The evaluation also examined the extent to which approval rates for study permits fluctuated between 2009 and 2013.⁷¹ Table 5-5 indicates that approval rates for study permits have remained largely consistent and increased only slightly from 2009 to 2013 (73% to 75%).

Table 5-5: Approval Rate for Study Permit Applications, 2009-2013

Approval rate for new study permit applications	2009	2010	2011	2012	2013	Moyenne
Approved	87,435 73%	96,567 71%	98,724 72%	105,599 73%	119,184 75%	101,502 73%
Refused	29,937 25%	36,172 27%	34,546 25%	38,362 26%	38,542 24%	35,512 25%
Withdrawn	3,157 3%	3,739 3%	4,659 3%	1,411 1%	1,638 1%	2,921 2%
Total	120,529	136,478	137,929	145,372	159,364	139,934

Source: GCMS

When asked to what extent decision-making related to ISP applications is consistent, most of CIC interviewees felt it is very consistent due to the relatively straight-forward processing procedures in place as well as the existence of the aforementioned tools and supports which officers use. However, interviewees also pointed out that some inconsistency has been traditionally related to the assessment of the genuineness of particular schools. Some CIC interviewees also suggested that the designated institutions lists will allow for increased consistency in decision-making as the assessment of the educational institutions will already have been conducted.

5.5. Maintaining Program Integrity

Finding 15: There are a variety of program integrity activities being conducted for the ISP across the department; however, there are opportunities for better sharing of program integrity tools, procedures, and reporting across CIC's network.

⁷¹ As approval rates are also a function of the quality of applications which can vary from year to year, this indicator is only an additional indicator for consistency.

Section 5.3.2 describes what has been done since the previous evaluation in terms of measures planned and underway to improve program integrity. This section provides information on the extent to which CIC has appropriate procedures in place for supporting program integrity.

5.5.1. Procedures in Place for Supporting Program Integrity

In addition to the regulatory requirement introduced on June 1, 2014 and the compliance reporting portal currently being developed for educational institutions to report to CIC on the enrolment status of their international students, CIC also has a number of mechanisms and tools in place to support program integrity including:

- Program integrity reports, such as the Study Permit Network-Wide Exercise 2012-2013, are conducted by the Program Integrity Division.
- Monthly reports are produced by the Centralized Processing Region and they highlight potential fraud trends, including issues that have been flagged to and from CBSA.
- Quality Management Reports are conducted by CPC-Vegreville on various lines of business, including a 2014 report on Temporary Study Permit Applications Refused in 2013.
- Strategic Analysis is also conducted by CPC-Vegreville, on specific elements of lines of business.
- Some Canadian Visa Offices have implemented special programs and have established unique criteria/procedures to better identify fraud and misuse (e.g. Student Partners Program in India and China).

Most CIC interviewees noted that these measures are helpful, but there could be better sharing of best practices and dissemination of program integrity reporting across CIC's network.

In particular, overseas staff highlighted innovative initiatives which have helped to create efficiencies in terms of screening study permit applications in certain Canadian Visa Offices, which could be implemented across the network. For example, the Student Partnerships Program in India and Beijing requires students to hold a Canadian Guaranteed Investment Certificate which has reduced the amount of time officers need to spend processing local banks' proof of funds.

In addition, when asked about procedures in place to support program integrity, all interviewees mentioned the 2014 regulatory changes. While all interviewees were positive regarding the new regulatory changes, some also noted limitations in the new regulations.

- Although the new regulatory changes target educational institutions (by requiring them to be designated by the province or a territory), it is often the education programs which are of concern (not just educational intuitions).
- Some CIC interviewees noted that there is some evidence that schools are beginning to design new vocational programs which attempt to circumvent CIC's new regulations. For example, language schools are creating "client service programs" which can allow students to have access to work opportunities.
- As well, a few interviewees noted as a concern that K-12 students fall outside of the new regulations.

6. Findings: Resource Utilization

To address resource utilization, the evaluation utilized four years of available data from CIC's Cost Management Model to examine trends in ISP Costs specific to CIC and OGDs. The evaluation also focused on operational efficiency⁷² to calculate an annual cost per application decision and compare this number with cost per decisions for other Temporary Resident lines of business.

6.1. ISP Costs for Fiscal Years 2009/2010 to 2012/2013

Finding 16: Between FY 2009-2010 and FY 2012/2013, total ISP costs have decreased by roughly one third, largely as a result of reductions in support and OGD costs and not direct program delivery costs which increased by around one quarter over the same period.

Data from CIC's Cost Management Model was used to examine trends related to specific ISP costs including CIC Operations Sector costs (which is the sector within CIC responsible for processing study permit applications) as well as other CIC Program Management/Support costs and OGD costs. As displayed in Table 6-1, Operations Sector costs (which represented slightly over half of all CIC ISP costs between FY 2009/2010 and FY 2012/2013), decreased by 31% from \$11M in FY 2009/2010 to \$7.6M in FY 2012/2013.⁷³ Table 6-1 also illustrates that this reduction stemmed from a decrease in Operations Sector support/internal services costs (-50%) between FY 2009/2010 and FY 2012/2013 and not costs associated with direct program delivery, which actually increased by 22% over the same period. Between FY 2009/2010 and FY 2012/2013, ISP costs allocated to Other CIC Sectors (e.g. Corporate Services, Finance, Strategic and Program Policy) decreased by 54% (from \$12.7M to \$5.9M) while OGD costs decreased by 15% (from \$24M to \$20.5M).

⁷² Treasury Board Secretariat guidance specifies that operational efficiency is largely concerned with the question of how resources are being converted into outputs that support the achievement of intended outcomes in comparison to allocative efficiency which focuses on the cost per outcome. Source: Canada, Treasury Board of Canada Secretariat (2013) *Assessing Program Resource Utilization When Evaluating Federal Programs*.

⁷³ This table only includes Vote 1 and Employee Benefit Plan costs for CIC's Operations Sector.

Table 6-1: ISP Costs, FY 2009/2010 to FY 2012/2013

ISP Costs	2009/2010	2010/2011	2011/2012	2012/2013	Total	% increase from FY 2009/2010 to FY 2012/2013
CIC Operations Sector						
Direct Program Delivery (Inland)	1,850,853	2,032,821	1,947,907	2,040,197	7,871,779	10%
Direct Program Delivery (Overseas)	1,047,683	1,063,189	1,333,320	1,484,030	4,928,221	42%
Total Direct Program Delivery	2,898,536	3,096,010	3,281,227	3,524,227	12,800,000	22%
Direct and indirect program support and internal services*	8,169,013	8,941,165	5,946,799	4,116,294	27,173,271	-50%
Total CIC Operations Sector	11,067,549	12,037,175	9,228,026	7,640,521	39,973,271	-31%
CIC Other Sector Costs						
Corporate Services, Executive, Finance, Reserve, Strategic and Program Policy, etc.**	12,700,758	14,109,361	6,038,302	5,892,809	38,741,230	-54%
Total CIC Costs	23,768,307	26,146,536	15,266,328	13,533,330	78,714,501	-43%
OGDs						
DFATD Locally Engaged Staff	3,813,780	4,083,098	3,477,923	3,458,717	14,833,519	-9%
DFATD Other	13,750,723	11,206,920	9,934,295	10,469,177	45,361,115	-24%
Other (CBSA, CSIS, RCMP, etc.)	6,478,434	6,574,348	5,972,845	6,576,445	25,602,072	2%
Total OGDs	24,042,937	21,864,366	19,385,063	20,504,339	85,796,705	-15%
Total Government of Canada						
Cost	47,811,244	48,010,902	34,651,391	34,037,669	164,511,206	-29%

* These costs include activities in direct support of program delivery including support and director/managerial/supervisory activities and internal services within CIC's Operations Sector.

** Caution should be exercised when making year to year comparisons of direct and indirect program support and internal services and Other CIC Costs due to allocation rule changes associated with the Cost Management Model between FY 2011/2012 and FY 2012/2013.

Source: CIC Cost Management Model

While interviewees were generally unable to comment on the specifics of ISP costs, information received as part of the financial data suggested that a potential explanation for the reduction in ISP costs can be linked to changes associated with the federal government's 2011 Deficit Reduction Action Plan and C-50 Modernization initiatives (e.g. the closure of Canadian Visa Offices Abroad as such as Dhaka, Kuala Lumpur, Tokyo, Berlin, Belgrade, Buffalo's visa and immigration section, etc. as well as the centralization of some functions). This is consistent with data presented in Table 6-1 which illustrate the costs of locally engaged staff and other DFATD costs associated with ISP program delivery.⁷⁴ As shown in Table 6-1, DFATD costs for locally engaged staff and other costs (i.e. infrastructure) which are all tied to processing overseas, have both decreased between FY 2009/2010 and FY 2012/2013 (Locally Engaged Staff by 9% and other DFATD costs by 24%).

6.2. Temporary Resident Business Line Cost Comparison, Fiscal Years 2009/2010 to 2012/2013

Finding 17: The cost per study permit application decision has decreased, suggesting increasing cost effectiveness.

⁷⁴ Locally engaged staff, and other DFATD costs associated with the ISP, support CIC processing of study permit applications in overseas visa offices.

Four years of Cost Management Model data was also used to analyze and compare the estimated CIC and OGD costs of the ISP with other Temporary Resident business lines, specifically Visitor visas and Temporary Foreign Workers.⁷⁵ As displayed in Table 6-2, while the overall Program cost decreased for each Temporary Resident business lines from FY 2009/2010 to FY 2012/2013, the largest proportional decrease was associated with ISP:

- ISP costs fell by 29% from FY 2009/2010 to FY 2012/2013 (\$47M to \$34M);
- Costs for the Temporary Foreign Worker Program fell by 17% (\$112M in FY 2009/2010 to \$94M in FY 2012/2013); and
- Costs for the Visitors Program fell by 25% (\$178M in FY 2009/2010 to \$132M in FY 2012/2013).

Table 6-2: Cost per Decision for TR Lines (CIC and OGD costs), FY 2009/2010 to FY 2012/2013

Cost per decision	2009/ 2010	2010/ 2011	2011/ 2012	2012/ 2013	2013/ 2014	Average	% increase from FY 2009/2010 to FY 2012/2013
Total ISP Cost	\$ 47,811,244	\$ 48,010,902	\$ 34,651,391	\$ 34,037,669	*	\$ 41,127,802	-29%
# of decisions	190,473	209,422	225,088	218,351	*	210,901	14%
Cost per ISP decision	\$ 251	\$ 229	\$ 154	\$ 156	*	\$ 198	-38%
Total Temporary Foreign Worker Program Cost	\$112,360,900	\$119,635,487	\$ 96,421,852	\$ 93,759,333	*	\$105,544,393	-17%
# of decisions	373,555	347,317	422,511	358,208	*	375,398	-4%
Cost per TFW decision	\$ 301	\$ 344	\$ 228	\$ 262	*	\$ 284	-13%
Total Visitors Program Cost	\$177,594,866	\$156,953,651	\$127,964,963	\$132,436,664	*	\$148,737,536	-25%
# of decisions	1,060,816	1,133,806	1,206,865	1,234,282	*	1,158,942	16%
Cost per Visitor Visa decision	\$ 167	\$ 138	\$ 106	\$ 107	*	\$ 130	-36%

*Note: Information will be available only in January 2015.

Source: CIC Cost Management Model(cost information), GCMS (# of decisions)

As volumes for number of decisions increased while costs were declining between FY 2009/2010 and FY 2012/2013, the cost per study permit application decision fell from \$251 in FY 2009/2010 to \$156 in FY 2012/2013, with an average cost of \$198 per decision over the four years. Similar to results from the 2010 ISP evaluation, the average cost per decision for study permits was lower than temporary foreign worker visas (\$284) but higher than visitor visas (\$130), given the different complexities in processing these three types of applications.

⁷⁵ Applications processed refers to applications that were finalized in a given year (i.e. the applications for which a final decision was rendered). Cost figures include all the CIC costs associated with processing study applications from receipt to rendering a final decision; as well as all the efforts from OGDs (security screening, etc.), including CBSA Port of Entry costs. Costs associated with policy development relating to international students are not included.

7. Conclusions and Recommendations

Based on the evaluation evidence presented in this report, the following conclusions and recommendations are put forward.

7.1. Relevance

The ISP remains relevant as it responds to a continuing need, aligns with federal and departmental priorities, and is aligned with federal role and responsibilities.

As there continues to be demand for international students to study in Canada and that international students bring economic and socio-cultural benefits to Canada, the evaluation found a continuing need for the ISP. Moreover, international students have been articulated as a priority in both federal and provincial/territorial government strategic documents due to the economic benefit they provide.

Although there is a clear federal legislative framework through the IRPA for the federal role in the ISP, and the Program is consistent with overall federal government responsibilities for authorizing the entry of temporary residents, provinces and territories and educational institutions also have a strong role to play in supporting the integrity of the ISP. Provinces and territories are well positioned to ensure the legitimacy of institutions in their jurisdictions, and educational institutions are well placed to provide information pertaining to the enrolment status of international students.

7.2. Performance

7.2.1. ISP Policy and Governance

Recommendation #1: CIC should work with federal partners to:

- **Increase OGD coordination around program delivery and to further clarify departmental roles and responsibilities regarding the ISP; and**
- **Ensure compliance and enforcement of the 2014 ISP regulatory changes.**

Between 2009 and 2013, coordination with regard to the ISP with provinces/territories and educational institutions via the Canadian Consortium was effective, particularly in terms of developing the 2014 regulatory changes. Despite these successes, there is room for strengthened governance and improved coordination on the ISP across federal departments whose active cooperation is critical for achieving the Program's expected outcomes. As the DFATD International Education Strategy seeks to double the number of international students by 2022, more coordination between DFATD and CIC on target markets and program integrity risks in specific markets would allow for better operational planning, and better alignment of resources for processing study permit applications. This will in turn help Canada to remain globally competitive in the 'pursuit' of international students.

In addition, more work is needed to clarify the appropriate role and objectives for CIC (overseas and in-Canada) to support DFATD efforts to promote and provide ISP-related information to international students. While CIC staff are often asked to provide accurate and up-to-date information to prospective students, educational institutions and other parties seeking immigration-related information, there is no clear direction and guidelines for CIC on how to support these efforts. By formalizing its role, in conjunction with other partners, CIC can ensure that prospective applicants have

the information they need to submit complete applications and CIC offices are able to properly plan for and resource this activity.

Since the last evaluation of the ISP in 2010, CIC has implemented major changes to the ISP which are expected to improve program integrity. Although it is too early to assess the outcomes of these changes, there is room for increased coordination with CBSA to with respect to compliance and enforcement of the 2014 ISP regulations.

While international students are required to actively pursue their studies, a robust reporting system, as well as policies and procedures for enforcing the regulations, needs to be developed.

Recommendation #2: In light of GOC priorities for international students and the evolving CIC policy context, CIC should review and clarify the program logic for the ISP and more particularly its expected outcomes, also taking into consideration relevant temporary and permanent resident programs.

The ISP is demand-driven in that international students decide to apply to Canada and can take advantage of opportunities to transition to permanent residency, therefore the Program is, by default, processing applications received rather than selecting ideal candidates. In addition, the number of international students transitioning may be viewed as low in comparison to the total number of international students coming to Canada. Although there is some evidence to show that Canada benefits when an international student returns home and develops linkages and ties to Canada, many stakeholders expressed that there is also a benefit and need for some international students to transition to permanent residency.

Given that Canada is seeking to attract the best and brightest international talent, and also as the number of international students entering is expected to continue to increase, there may be an opportunity for CIC to review its program logic in order to ensure alignment between the ISP and CIC's other temporary and permanent resident programs as well as DFATD's objectives under the International Education Strategy.

7.2.2. Minor Students and Custodianship Requirements

Recommendation #3: CIC should review its policies and operational guidance regarding minor students and custodianship.

The evaluation noted several gaps pertaining to the processing of applications from minor students as well as requirements for custodians of unaccompanied minors. Evidence suggests that there is some inconsistency in the ways in which some unaccompanied minors are processed across CIC and CBSA as well as for how long to issue visas. In addition, both documents and stakeholders consulted as part of the evaluation suggested that requirements around custodians should be reviewed to ensure they are strong enough to protect minor students, who represent a vulnerable population and account for a significant proportion of international students (25% in 2013).

7.2.3. Coordination and Information-Sharing within CIC

Recommendation #4: CIC should strengthen information sharing across its processing network regarding program integrity (tools, best practices and reporting) and case referrals.

Within CIC, there is a need for better information-sharing between different offices that deal with study permit applications to allow for more systematic dissemination of reporting information on program integrity and better communication regarding case referrals between Central Processing and local CIC

offices. By improving coordination in these areas, CIC will be able to ensure that program integrity information is more widely available to be used by decision-makers and that the referrals between Central Processing Centre and local CIC offices are better informed.

The 2010 ISP evaluation found that "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 inconsistency". In 2012, CIC undertook a network-wide exercise which demonstrated that decisions on study permit applications are consistent, and although decision-making is consistent, a variety of program integrity activities exist across CIC's network. While flexibility for processing offices to develop program integrity tools, procedures and reporting tailored to regional contexts is important, there are opportunities for better sharing of best practices (e.g. elements from the Student Partners Program in India) across CIC's processing network.

7.2.4. Processing Times and Modernization Initiatives

Recommendation #5: CIC should monitor and report the impact of modernization initiatives on the ISP and identify opportunities to improve ISP processing times.

Between 2009 and 2013, processing times for study permits and study TRVs have increased. During this time period, CIC introduced a service standard as well as several modernization initiatives designed to improve client service and reduce processing times. While early results suggest that modernization initiatives (such as the use of electronic applications and Visa Application Centres, in comparison to paper applications), have had a positive impact on timeliness of application processing for study permits, this has not been the case for study TRVs, where data indicates they have had a negative impact. Especially as the numbers of international students are expected to grow given recent trends and as part of the International Education Strategy, CIC should continue to monitor the impact of modernization initiatives to ensure that they are improving efficiency which translates to a positive impact on processing times per application. Moreover, CIC should explore the extent to which clients are aware and making use of faster application methods, and if necessary, promote the use of these methods to prospective applicants. Evidence from the 2010 evaluation of the ISP suggests that further usage and uptake of the fastest methods to process applications would contribute to positively impact Canada's competitiveness, as processing times are perceived by applicants as a key factor in selecting a study destination.

7.2.5. Data Gaps

Recommendation #6: CIC should develop and implement a strategy to address ISP data quality issues.

There continue to be gaps, inconsistency and reliability issues in ISP data. This includes concerns with data on short-term students (SX-1 visas), distribution of students by level of study, data on the field of study, and last country of permanent residence. In addition to these issues, stakeholders outside of CIC expressed that the department could do more to communicate and provide better quality data to ISP partners. Given the new requirements for data sharing (as outlined in Memoranda of Understanding between CIC and provinces/territories as part of the 2014 regulatory changes), having more reliable program information will be critical to support future policy and program development. As part of this effort, CIC should develop a strategy or plan for ISP data to ensure that credible and reliable performance data are being collected and used.

Appendix A: 2010 International Student Program Evaluation Management Response Action Plan

Key Finding	Response	Action	Accountability	Implementation Date
I. Program 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.	CIC agrees with this finding	No action required	Immigration	N/A
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.	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).	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.	Immigration	Fall 2010
II. Benefits				
The economic benefits for educational institutions and communities through the revenue generated by international students are extensive, and distributed across much of Canada.	CIC agrees with this finding.	No action required.	Immigration/ OMC/IR	N/A
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	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 experience increased	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).	Immigration/ Communications/ OMC/IR	N/A

Key Finding	Response	Action	Accountability	Implementation Date
<p>Canada. However, the number retained is still relatively small compared to the total number of those studying in Canada.</p>	<p>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.</p> <p>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.</p> <p>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.</p>			
III. Global Competitiveness				
<p>While Canada's study/work offerings for international students are comparable to those of other countries, it is still being outperformed by comparable countries.</p> <p>Issues with respect to promotion and application processing were identified as possible obstacles to Canada's global competitiveness.</p>	<p>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.</p> <p>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 such as Australia, UK and the USA, average processing times vary between 4-6 weeks.</p> <p>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).</p> <p>CIC will continue to review potential options for streamlining application procedures, and further reducing processing times, where feasible.</p>	<p>Promotion: Promotion of international education falls under the responsibility of DFAIT and PTs.</p> <p>Processing: 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</p>	<p>Promotion: DFAIT</p> <p>Processing: SIO/IR/CPR</p>	<p>Promotion: N/A</p> <p>Processing: Fall 2010</p>

Key Finding	Response	Action	Accountability	Implementation Date
IV. Program Integrity				
<p>CIC's policy framework and gaps in program design leave the ISP vulnerable to potential misuse.</p> <p>There is no legislative requirement for international students to study once they are in Canada.</p> <p>CIC does not have a complete list of legitimate educational institutions in Canada.</p>	CIC agrees with this finding.	<p>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.</p> <p>As part of the negotiations, CIC will:</p> <ul style="list-style-type: none"> ▪ propose to introduce regulatory changes that would require international students to study; and ▪ ask PTs to provide CIC with a list of legitimate educational institutions. 	Immigration	Fall 2011
<p>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.</p>	CIC agrees with this finding.	<p>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.</p>	Immigration	Fall 2011
<p>Quality assurance activities are variable across the department, making it difficult to assess the overall quality and consistency of decision-making on student applications.</p>	CIC recognizes the importance of consistency in all our program delivery. As we move to modernize our service delivery model we will 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.	<p>The Draft Quality Assurance Framework (QAF) is currently in consultation with other branches within CIC and will be presented in September to senior management. The QAF includes:</p> <ul style="list-style-type: none"> ▪ mandatory reporting requirements, and ▪ central analysis function to leverage lessons learned and best practices within the network. 	OMC/IR/CPR	2010/2011

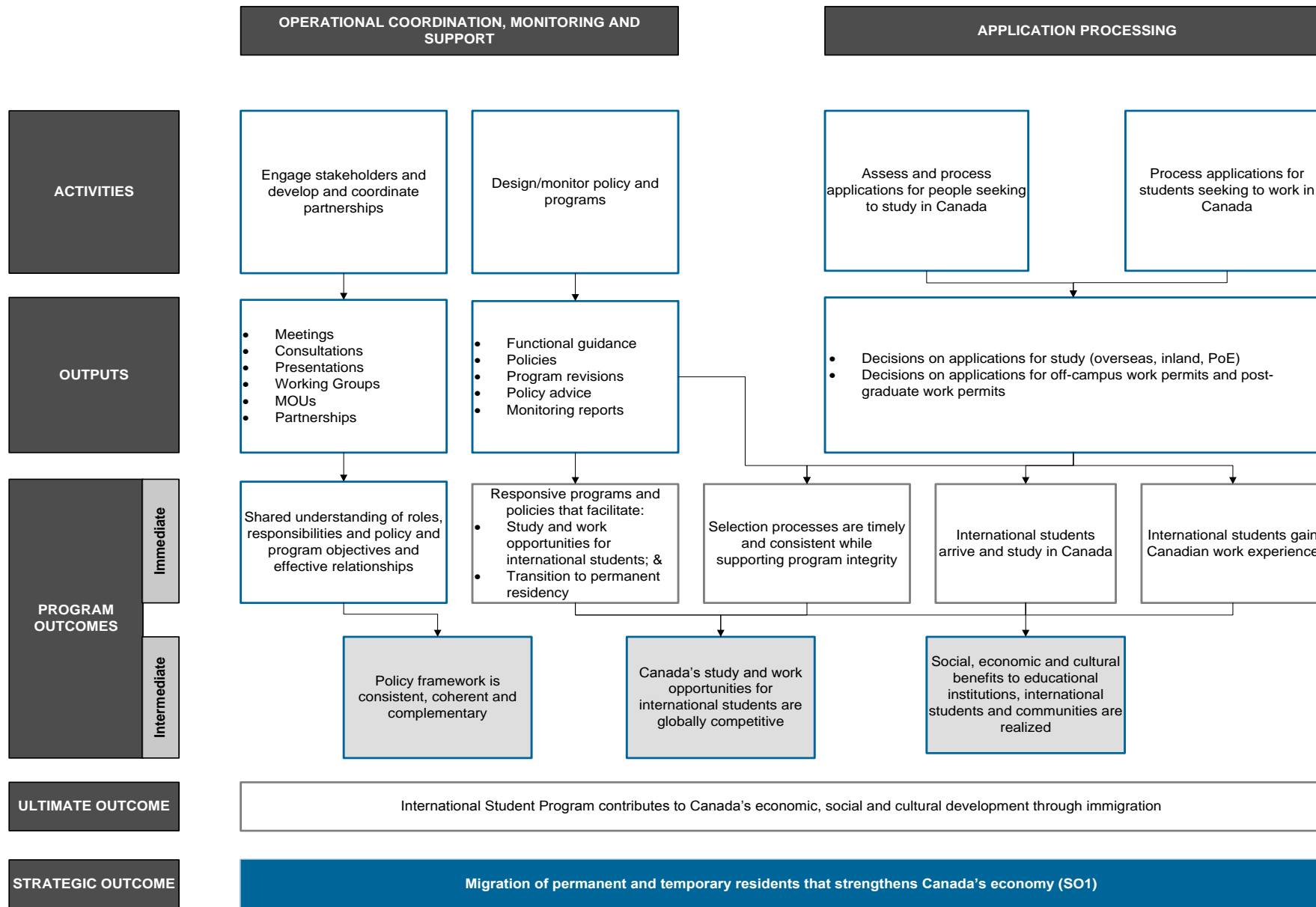
Key Finding	Response	Action	Accountability	Implementation Date
V. Program Management and Delivery				
<p>Visa offices identified a need for greater information and support related to genuine/non-genuine educational institutions and programs.</p>	<p>CIC agrees with this finding.</p>	<p>As part of the negotiations with PTs, CIC will request that PTs provide CIC with a list of genuine educational institutions, and eligible programs.</p> <p>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.</p>	<p>Immigration/IR/OMC</p>	<p>Fall 2011</p>
VI. Application Processing				
<p>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.</p>	<p>In 2009, close to 70% of study permit applications were processed within 28 days.</p> <p>CIC will continue to review potential options for streamlining application procedures, and further reducing processing times, where feasible.</p>	<p>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.</p>	<p>SIO/IR/CPR</p>	<p>Fall 2010</p>

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Appendix C: International Student Program Logic Model



Appendix D: Evaluation Framework

Evaluation Issue	Indicators	Methodology
Program Profile		
The program profile will provide a description of the clients who use the International Student Program and its associated work programs.	<ul style="list-style-type: none"> ▪ Profile of international students arriving (gender, age, mother tongue, official language ability, level of study, length of study, country of origin, regional distribution by province and relation to Census Metropolitan Area, urban and other) ▪ Profile of international students remaining in Canada (stock) ▪ Postgrad work program user demographic overview ▪ Off campus work program user demographic overview ▪ Coop work program user demographic overview ▪ Differences in the profile of international students using the work programs and those not using them 	<ul style="list-style-type: none"> ▪ Analysis of Administrative Data (RDM stats)
Relevance		
1. To what extent is there a continued need for the International Student Program?	<ul style="list-style-type: none"> ▪ Documented rationale for the need for a program for international students ▪ Trends in the number and profile of applications ▪ Trends in the number and profile of admissions ▪ Trends in the number of study permit renewals ▪ Number of re-entries ▪ Perceptions of stakeholders regarding continued need 	<ul style="list-style-type: none"> ▪ Document review (TB submissions, legislative and policy documents, operational manuals and bulletins) ▪ Analysis of Administrative Data (GCMS) ▪ Interviews: CIC (IB, OMC, IR, Regions); P/Ts; OGDs (DFATD); NGOs (CBIE, AUCC, ACCC)
2. To what extent is the International Student Program aligned with departmental and government-wide priorities?	<ul style="list-style-type: none"> ▪ Alignment between ISP policies/directives and departmental and government wide priorities ▪ Perceptions of stakeholders regarding alignment between ISP and departmental and government wide priorities 	<ul style="list-style-type: none"> ▪ Document review (TB submissions, RPP, Speech from the Throne, Budget, agreements, legislative and policy documents) ▪ Interviews: CIC (IB, OMC, IR); OGDs (DFATD)
3. To what extent is the International Student Program aligned with federal roles and responsibilities?	<ul style="list-style-type: none"> ▪ Alignment with legislative and federal obligations ▪ Perceptions of key stakeholders regarding the alignment and appropriateness of the federal role 	<ul style="list-style-type: none"> ▪ Document review (legislative, program and policy documents, agreements,) ▪ Interviews: CIC (IB, OMC, IR); P/Ts
Program Performance		
4. To what extent has CIC addressed the program issues identified in the previous ISP evaluation related to: Program integrity?	<p>Program Integrity:</p> <ul style="list-style-type: none"> ▪ Measures planned/underway to improve program integrity based on findings from the previous evaluation ▪ Evidence of issues not yet addressed or resolved ▪ Policy/program improvements resulting from program integrity issues being addressed 	<ul style="list-style-type: none"> ▪ Document review (Management Response Action Plan, audit/policy documents, updates to operational manuals and bulletins, Student Partners Program reports) ▪ Interviews: CIC (IB, OMC, IR); OGDs (DFATD)

Evaluation Issue	Indicators	Methodology
Application processing?	<p>Application processing:</p> <ul style="list-style-type: none"> ▪ Measures planned/underway to improve timeliness and efficiency of application processing based on findings from the previous evaluation ▪ Evidence of issues not yet addressed or resolved ▪ Policy/program improvements resulting from application processing issues being addressed ▪ Perceptions of ISP representatives regarding extent to which identified issues have been addressed 	
5. To what extent is stakeholder engagement related to the ISP effective?	<ul style="list-style-type: none"> ▪ Mechanisms for stakeholder (internal and external) engagement are in place and function well ▪ Perceptions of stakeholders regarding the effectiveness of engagement 	<ul style="list-style-type: none"> ▪ Document review (ISP working group and committee terms of reference and minutes) ▪ Interviews: CIC (IB, OMC, IR, Regions); P/Ts, OGDs (DFATD, CBSA, IC, HRSDC); NGOs (CBIE, AUCC, ACCC)
6. To what extent do ISP policies and programs facilitate study and work opportunities for international students? Do they facilitate transition to permanent residency?	<ul style="list-style-type: none"> ▪ Number and types of study/work streams available for temporary residents ▪ Evidence of barriers to access work programs for particular student groups ▪ Evidence of unintended impacts of ISP policies and programs ▪ Perceptions of adequacy of work/study opportunities available to Foreign Nationals ▪ Perceptions of unintended impacts of ISP policies and programs ▪ Number of former international students transitioning to permanent residency through CEC, PNP, FSW (for those with and without a work permit) 	<ul style="list-style-type: none"> ▪ Document review (policy documents, operational manuals and bulletins, eligibility criteria) ▪ Analysis of Administrative Data (GCMS) ▪ Interviews: CIC (IB, OMC, IR Regions); P/Ts; OGDs (DFATD, CBSA, HRSDC); NGOs (CBIE, AUCC, ACCC)
7. To what extent have selection decisions been timely and consistent?	<p>Timely:</p> <ul style="list-style-type: none"> ▪ Average ISP application processing times by application method, and comparison of processing time over period of previous evaluation with current evaluation and compared to other countries (e.g. Australia, United Kingdom, New Zealand, United States, France) ▪ Proportion of applications finalized within the established service standards by application method (eapps, VACs, dropbox) ▪ Improvements to timeliness resulting from implementation of eapps for ISP applications <p>Consistent:</p> <ul style="list-style-type: none"> ▪ Mechanisms and tools are in place that promote consistent decision making (consistent training for visa officers, quality assurance exercises, coordination within CIC) ▪ Comparison of student application acceptance, withdrawal and refusal rates overall and by CVOA (over time and reasons if available) ▪ Perceptions of CIC staff related to timeliness and consistency 	<ul style="list-style-type: none"> ▪ Document review (training material, training schedule and syllabi, QA templates, operational manuals and bulletins) ▪ Analysis of Administrative Data (GCMS, CPC & CVOA stats) ▪ Interviews: CIC (IB, Regions, IR including CVOA, CPR); P/Ts; OGDs (DFATD)

Evaluation Issue	Indicators	Methodology
8. To what extent do selection processes support program integrity?	<ul style="list-style-type: none"> ▪ Evidence of mechanisms/procedures for fraud verification (monitoring practices, data capture, strategic analysis, reports, antifraud bulletins/guidance to the field, coordination and information sharing within CIC and with CBSA, etc.) ▪ Trends in nature and extent of misuse & fraud over time ▪ # of cases referred to CBSA for investigation, # of investigations & # of removal orders & removals ▪ Trends in refusals #s and reasons for refusal – over time ▪ Number and % of foreign nationals obtaining off campus work permits that do not continue to meet the necessary conditions ▪ Perceptions of adequacy of measures/procedures in place to identify fraud/misuse, including identification of gaps 	<ul style="list-style-type: none"> ▪ Document review (reports on fraud/program integrity) ▪ Analysis of Administrative Data (GCMS, CPC & CVOA stats) ▪ Interviews: CIC (IB, Regions, IR including CVOAs, CPR); OGDs (CBSA, RCMP)