



Canadian Bureau for  
International Education  
Bureau canadien de  
l'éducation internationale



**November 30, 2020:** *The following briefing note was prepared for Immigration, Citizenship and Refugees Canada (IRCC) by the Canadian Bureau for International Education (CBIE) Immigration Advisory Committee & the Co-operative Education Work Integrated Learning (CEWIL) Advocacy Group.*

## Co-op Work Permit Processing Times

### Issue Statement

Post-secondary educational institutions across Canada are seeing an increase in international students who are interested in study programs that incorporate a work-integrated learning (WIL) component which would require a co-op work permit. These statements and data have been obtained by Co-operative Education and Work-Integrated Learning Canada (CEWIL Canada), formerly Canadian Association for Co-operative Education (CAFCE). CEWIL Canada is the lead organization for work-integrated learning in Canada, and is actively shaping the future of work-integrated learning through advocacy and collaboration with major WIL stakeholders. This work is led by the [Government and External Relations Committee](#).

CEWIL partners with post-secondary institutions, community members, organizations, employers, government, and students to champion work-integrated learning (WIL). Since 1973, CEWIL Canada members from post-secondary institutions across the country have worked in partnership to develop resources to promote the highest quality of post-secondary work-integrated learning programs. CEWIL maintains a national database on WIL including co-op with data from more than 90 post-secondary member institutions across Canada. The data shows that as many as 75,000 students are participating in co-operative education programs (an established form of WIL). In 2019, a total of 67,527 work terms was reported completed.

The challenge that is faced by international students is that processing times for in-Canada work permit applications can take months to obtain, impacting their ability to begin their co-op/WIL terms in a timely fashion, and even complete their programs on time, if at all.

While international students may apply for their co-op work permit simultaneously with their study permits from outside of Canada, the challenge that is faced by international students is that there continues to be inconsistencies with the issuance of co-op work permits at the port-of entry. This occurs even when international students provide a letter of introduction to CBSA that includes a co-op work permit approval, and/or an official letter of acceptance which indicates that there is a mandatory WIL placement. Anecdotally, students have indicated that CBSA officers advise them to apply for the work permit from within Canada.

Therefore, when students do not receive their co-op work permits upon entry to Canada, they have no choice but to apply separately for their co-op work permit from inside Canada. When they do apply for their co-op work permit from within Canada they are faced with long processing times for in-Canada work permit applications which can take months to obtain, and thereby impacting their ability to begin their co-op/WIL terms in a timely fashion, and even complete their programs on time, if at all.

Co-op work permit processing time from within Canada is currently at 137 days (as of November 30, 2020), which is exceptionally long and negatively impacts a student's ability to complete their mandatory WIL when it occurs in their first year of studies. This delay can force a student to fall behind in their studies, and/or not be able to complete their studies entirely for not meeting program requirements.

Delays in co-op work permit processing (and the lack of a process for continuing students who have returned home to apply for a stand-alone co-op work permit from outside Canada) have impacted the ability of some international students to continuously pursue their studies or finish their studies as planned. This may also have negative impacts on the DLI's relationships with companies who utilize the institution to help fill student work positions, and also on the students' ability to obtain a PGWP upon successfully completing their program.

## **Proposal**

As we anticipate the number of international students who intend to take part in a WIL experience continue to grow, we are also proposing the following solutions:

### **Immediate in Preparation for Winter 2021:**

1. Include International students who apply for a co-op work permit from within Canada, in the new temporary policy aiding temporary foreign workers in Canada who are seeking

permission to work in a new employment opportunity, which expedites these work permit requests<sup>1</sup> OR

2. Implement a temporary policy change to allow international students to pursue their WIL experience on a full-time or part-time basis upon application of their co-op work permit from within Canada, mimicking R186(w) and policies surrounding the post-graduation work permit (PGWP) and the ability to begin working upon successful submission of the work permit application. This will enable eligible students to begin their WIL experience while their application is being processed so as to not impact progression in their study program, AND
3. Allow students who are outside of Canada, and who hold valid study permits, to apply for a stand-alone co-op work permit that's not associated with a new study permit application. The online application system currently does not allow that. There are a number of students who are currently pursuing their online studies from overseas due to the pandemic who would need to apply for a co-op work permit.

### **Permanent Proposal:**

1. Abolish a separate co-op work permit altogether. Include the ability to work in a co-op/WIL position without a work permit through the creation of a new work permit exemption category under R186, pending meeting eligibility criteria, such as being the holder of a valid study permit and being enrolled in a DLI. A remark could then be included as a condition on the student's study permit. This would mimic the changes made to the Off-Campus Work Permit program on June 1, 2014, and make processing times for co-op work permits null and void.
2. Abolish the need for the WIL placement to be a mandatory component of the students degree and replace it with the need for the WIL placement to be for academic credit. Recognizing that many programs are now offering optional for-credit WIL placements.

### **Rationale**

We are extremely grateful to the fact that IRCC has been receptive to finding solutions to aid our international student population throughout the COVID19 pandemic, to ensure that Canada remains one of the top countries of choice for students around the world. As such, we are hopeful that IRCC will continue to be receptive to understanding the challenges faced by students with long co-op work permit processing times, and working collaboratively to find viable solutions. By enabling students to fulfil the requirements of their programs by completing their WIL placements in the appropriate program time frame, students, employers and DLIs will benefit. We are drawing on the following examples of IRCC flexibility:

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<sup>1</sup> <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/service-delivery/coronavirus/temporary-residence/work-permit/changing-employment.html>

## **Temporary Policy Change – Prioritizing In-Canada Work Permit Applications for Changes in Employment**

We are aware that IRCC has implemented a new temporary policy guideline which prioritizes work permit applications submitted from within Canada, for temporary foreign workers who are changing employment<sup>2</sup>. We are asking that IRCC recognize the economic contribution of international students completing a co-op work term, and are hopeful similar considerations be given to international students needing to complete a co-op work term, that has been given to temporary foreign workers in Canada.

International students are eligible to work under R186(f) and R186(v) without a work permit, assuming they meet all other eligibility criteria. However, they have to apply for a work permit, and be in possession of it, to be eligible to participate in their work integrated learning terms. While the co-op work permit is not employer specific, it is specifically tied to the student meeting co-op work permit eligibility criteria.

## **Post-Graduation Work Permit Work Eligibility**

As per paragraph [R186\(w\)](#), eligible international students are authorized to work full-time after submitting their post-graduation work permit application. This policy has been very beneficial for international students to be able to seek full-time employment after graduation and not be negatively impacted by IRCC processing times. We believe that this can also be applied to the co-op work permit application to allow international students authorization to pursue their WIL experience as their work permit is being processed.

## **Temporary Policy Change – Time Spent Studying Outside Canada and PGWP Eligibility**

IRCC, understanding the economic benefit of international students, announced on August 26, 2020 that they would allow international students to count the time they spend studying outside of Canada, to count toward their PGWP<sup>3</sup>. These changes provide more flexibility on PGWP eligibility for students who are starting their study program from overseas. This policy shows that IRCC was willing to be flexible to accommodate the needs of international students and recognize their important economic contribution post-graduation. We are hopeful that IRCC will also recognize their economic contribution throughout their degree, and as such, be willing to accommodate a temporary policy change to combat long processing times which are having a negative impact on our international student population.

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<sup>2</sup> <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/service-delivery/coronavirus/temporary-residence/work-permit/changing-employment.html>

<sup>3</sup> <https://www.canada.ca/en/immigration-refugees-citizenship/news/notices/pgwp-eligibility-measures.html>

## **Abolishing the Off-Campus Work Permit – June 1, 2014**

Prior to June 1, 2014, international students who were eligible to work off-campus, had to apply for and be in possession of, an off-campus work permit prior to pursuing any off-campus work. However, IRPR was amended in February of 2014 to include R186(v) and (w), which allowed eligible international students to work off-campus and post-graduation without the need to obtain a physical work permit.<sup>4</sup> On June 1, 2014<sup>5</sup>, IRCC implemented these IRPR changes by putting the conditions of work directly onto the study permit itself. We are hopeful that a similar change can be implemented to accommodate WIL placements.

**CEWIL – Fact, Figures and Statements – attached below in Appendix A and B.**

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<sup>4</sup> <http://gazette.gc.ca/rp-pr/p2/2014/2014-02-12/html/sor-dors14-eng.html>

<sup>5</sup> <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/updates/2014-05-30.html>

## Appendix A: CEWIL Data

### WIL Impacts of COVID-19 on International Student Co-op Report prepared October 29, 2020

The data that follows was collected from CEWIL Canada members, specifically, the directors and managers of WIL programs. There were 38 work-integrated learning programs at 36 schools that submitted data between September October 19-29, 2020. Participating institutions are listed on the next page.

#### ***Current International Student Co-op Enrolment***

Institutions were asked to report on the current number of international students enrolled in co-op programs in the Fall 2020 term. There were a total of 26,023 international students enrolled in co-op programs across the 41 programs that reported information for this question.

<b>International Enrolment:</b>	<b>26,023</b>
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#### ***Percentage of International Student Co-op Enrolments (Fall 2020)***

Institutions were asked to report on what percentage of total co-op enrolments for Fall 2020 were comprised of international students. Across the 35 programs that reported information for this question, international students represented between 0-68% of co-op enrolments for the Fall 2020 term. On average, international students represented 19% of overall co-op enrolments in the Fall 2020 term.

<b>Range of Total Enrolment:</b>	<b>0-68%</b>
<b>Average of Total Enrolment:</b>	<b>19%</b>

#### ***Programs Requiring Completed Work Term Within 4-8 Months***

Institutions were asked to report on the number of international students enrolled in programs requiring that they complete a work term within the first 4-8 months (i.e., those in jeopardy of not meeting co-op degree requirements due to co-op work permit issues). There were a total of 8,084 international students enrolled in programs that required them to complete a work term within 4-8 months of beginning their program, across the 35 programs that reported information for this question.

<b>Students in Jeopardy:</b>	<b>8,084</b>
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### Participating Institutions

Institution	WIL Type	WIL Disciplines
Acadia University	Co-operative Education	All
Algonquin College	Co-operative Education	All
British Columbia Institute of Technology	Co-operative Education	Automotive Service
Brock University	Co-operative Education	All
Camosun College	Co-operative Education	All
Carleton University	Co-operative Education	All
Centennial College	Co-operative Education	All
Conestoga College	Co-operative Education	All
Dalhousie University	Co-operative Education	Commerce/Business Administration
Dalhousie University	Co-operative Education	Architecture
Durham College	Co-operative Education	All
Fanshawe College	Co-operative Education	Co-op
Kwantlen Polytechnic University	Co-operative Education	All
Memorial University of Newfoundland	Co-operative Education	All
Mohawk College	Co-operative Education	All
Mount Saint Vincent University	Co-operative Education	All
Ryerson	Co-operative Education	Chemical Engineering, Architecture, Science, Occupational and public Health
Saint Mary's University	Co-operative Education	Co-op
Sheridan College	Co-operative Education	All
Simon Fraser University	Co-operative Education	All
UNBC	Co-operative Education	All
Université d'Ottawa	Co-operative Education	All
Université de Sherbrooke	Co-operative Education	All
Université Laval	Co-operative Education	All
University of Alberta	Co-operative Education	Engineering
University of British Columbia	Co-operative Education	Arts, Commerce, Engineering, Kinesiology, Science
University of Calgary	Co-operative Education	All
University of Calgary	Co-operative Education	Business
University of Guelph	Co-operative Education	All
University of Lethbridge	Co-operative Education	All
University of Prince Edward Island	Co-operative Education	All
University of Regina	Co-operative Education	All

University of Toronto	Co-operative Education	Engineering
University of Toronto Scarborough	Co-operative Education	Management
University of Victoria	Co-operative Education	All
University of Waterloo	Co-operative Education	All
University of Western Ontario	Co-operative Education	Environment & Sustainability
Wilfrid Laurier University	Co-operative Education	All



## Appendix B: Statements from Participating DLIs

- Even prior to COVID-19, the wait times were already challenging for our international students to secure a co-op work permit in time, as there are short turn around times in our programs. For example, we have students in several programs who are accepted into co-op at the end of December that apply for jobs the next month in January to start in the beginning of May. Other students begin an academic program in June and begin a first mandatory co-op term in September. The current listed wait time of 174 days is a concern and adds to the already high stress levels international students are experiencing at this time.
- We have programs that are entirely comprised of international students, and we will not be able to offer co-op to any of them because they cannot get their work permits in time.
- Our Tourism & Hospitality Management program requires three co-op work terms. This program has an extreme number of international students. For example, we have 125 students in tourism projected for a co-op work term in summer 2021. 92% of summer 2021 tourism cohort are international students. We are VERY concerned about these students obtaining a co-op work permit as they are currently, in many cases, still in their home country as all classes are online this fall 2020 and winter 2021 semester. Also, the processing times for getting a co-op work permit are extreme.
- Some students did not receive their co-op work permit in time to secure a Fall work term. Even though student applied in April
- This is a very significant challenge for our students. For many of them, the WIL experience is a mandatory graduation requirement, so delays in the process may jeopardize their credential. This topic has moved to near the top of our departmental priorities
- There are many students who are still waiting to receive their work permits after 4-6 months after having applied and cannot start applying for a job until they arrive (internal policy; students must have their permit before applying to program).
- Our international students are in jeopardy of not being able to participate in next year's co-op program due to current delays
- We are concerned that many international students will not be able to confirm internship positions in the coming year because their Work Permits will not be processed on time. This could have an impact on Canada as a destination for international students.
- January Engineering Internship starts for International Students could be in jeopardy if permit delays continue exceeding 2-3 month