



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

January 8, 2021: The following briefing note summary was prepared for Immigration, Citizenship and Refugees Canada (IRCC) by the Canadian Bureau for International Education (CBIE) Immigration Advisory Committee. Please note that a more detailed briefing note document, that includes case studies and additional context, is in the works and will be shared as an appendix to this summary.

Post-Graduation Work Permit Program (PGWPP) and COVID 19

The importance of the PGWPP for Canada's competitiveness as a study destination and to help Canada achieve its goal of increasing the number of Canadian permanent residents is well-known and documented. The link between potential permanent residency, the ability to work in Canada, and the decision to study in Canada is essential for many students. Of the students surveyed in a 2018 survey by CBIE, 75 percent indicated that the ability to work in Canada was "essential" (42 percent) or "very important" to their decision to study in Canada (CBIE, 2018c). Further to this, international students are a key source of immigration to Canada, having been identified in Canada's International Education Strategy for 2019-2024 as "ideal candidates for permanent residency." As a result, we believe it is crucial that IRCC continue to implement facilitative measures with regards to the PGWP eligibility given the growing challenges the pandemic has brought upon us.

Allowing students to gain Canadian work experience after graduation is critical to preserving this important pathway and maintaining Canada's competitive advantage as a top choice for international students, who will play a critical role in Canada's post-COVID-19 economic recovery. The PGWPP is an integral component of this pathway to permanent residency for international students as it allows them to gain valuable Canadian work experience. This is why it is critical for Immigration, Refugees and Citizenship Canada to continue to implement measures that facilitate international students' eligibility to the PGWPP.

We are extremely grateful that IRCC has been receptive to finding solutions to aid our international student population throughout the COVID-19 pandemic and to ensure that Canada remains one of the top countries of choice for students around the world. We are hopeful that IRCC will continue its openness to understanding the challenges faced by students with regard to maintaining PGWP eligibility, and working collaboratively to find viable solutions.

The pandemic continues to disrupt IRCC processing capacities, Visa Application Centre (VAC) appointment capacities, and international students' ability to travel, as well as impacting Designated Learning Institutions' (DLI) mode of course delivery, availability of courses and mandatory work components. As we do not see a return to normal before later in 2021, we believe that the PGWP facilitative measures which were released on August 26, 2020 need to be updated to keep pace with the evolution of the current situation.

April 30, 2021 deadline and 50% within Canada requirement

Issue: Obtaining a study permit and travelling to Canada are still very lengthy and difficult processes, and will probably remain so for at least another several months due to the global impacts of COVID-19. We are concerned with the April 30, 2021 deadline for online studies completed from outside of Canada to count towards the length of the PGWP and the requirement for students to complete 50% of their program from within Canada if completing a program that is longer than 12 months or who began a short program after September 2020.

Proposal: To meet both of these concerns, we suggest that all courses/semesters taken at an eligible DLI between March 2020 and December 2021 (or August 2021) whether online or in person, in Canada or abroad be counted as in-Canada courses when calculating PGWP eligibility and length. We also suggest temporarily removing the requirement for students to complete 50% of their program from within Canada regardless of their program length, as well as eliminating the deadline to enter Canada by April 30, 2021 in order for remote courses to count towards the length of the PGWP. This policy should also be applied to students who applied or reapplied for a study permit after commencing their studies online (i.e. during their program), provided they are eventually approved for a study permit.

Issues with PGWP requirement to maintain full-time studies

Issue: Since March 2020, many students have struggled to maintain full-time enrollment for a variety of COVID-19-related reasons such as difficulties with remote learning (time zones), challenges in securing mandatory work terms, lack of availability of some required courses, and other issues.

Under the current post-graduation work permit policy, students who are unable to maintain full-time enrollment in even a single academic term become ineligible for the PGWP after program completion, often despite considerable efforts to enroll full time on a continuous basis over a number of years.

Proposal: We therefore suggest that PGWPP eligibility not be impacted if students were registered part time or took a break in studies between March 2020 and at least June 2021 for COVID-related reasons. Given this exception, we would suggest that the length of the PGWP still be assessed according to the official length of the program regardless of the actual duration of the studies.

Issues with requirement to have held a study permit within 180 days of applying for PGWP

Issue: Under the current IRCC policy, applicants for a post-graduation work permit must hold or have held a valid study permit within 180 days before submitting their application. Many international students have left Canada at the onset of the COVID-19 pandemic, and are now completing their academic programs from overseas without a valid study permit.

Proposal: To accommodate students who are completing eligible programs from overseas, we propose that IRCC exempt post-graduation work permit applicants outside Canada from the requirement to have held a valid study permit within 180 days of applying, if they previously held a study permit but left Canada and completed their program remotely.

Issue with long processing times for PGWP applications made from within Canada

Issue: Students who complete their programs from within Canada and then subsequently apply for their PGWP from inside Canada are currently facing very long processing times. While we understand the pressure and resources constraints that IRCC is facing, we would like to mention the following concern that has been raised by the long processing times for applications made inside of Canada. Students whose PGWP applications are refused and who wish to reapply find themselves in a difficult situation as often when they receive the refusal decision, they are now well past 180 days from when they received their proof of completion of studies. It is unclear if they are still able to reapply with new supporting documents for their PGWP.

Proposal: Allow students whose PGWP have been refused and who now find themselves past the 180-day deadline from proof of completion to re-apply for their PGWP. This flexibility measure should expire once IRCC processing times are back to reasonable pre-COVID levels.

PGWP Validity and Travel Restrictions

Issue: Finally, concerns have also been raised and may increase in concern in the coming weeks and months, regarding the current travel restrictions for PGWP holders, holders of a Letter of Introduction (LOI) for a PGWP, as well as for recent graduates wishing to travel

while holding a valid study permit or implied status and work authorization under R186w. We can provide further information regarding this particular issue as requested.

Proposal: To allow graduated students with a valid study permit or implied status to re-enter Canada (under the travel restriction exemptions for international students) in order to submit a PGWP within Canada. Additionally, we would suggest a similar exemption for PGWP LOI holders and PGWP holders, allowing them to return to Canada without a valid job offer (under the travel restriction exemptions for temporary workers).