



August 11, 2016

Mr. Paddy Buckley  
Assistant Deputy Minister, Strategic Policy and Programs Division  
Ministry of Advanced Education and Skills Development  
Mowat Block 17<sup>th</sup> Flr Rm 1747  
900 Bay Street,  
Toronto ON M7A 1L2

Via email to: [Paddy.Buckley@ontario.ca](mailto:Paddy.Buckley@ontario.ca)

Re: Career Colleges Ontario's Response to the Forum of Labour Market Ministers' Discussion Paper

Dear Mr. Buckley,

Thank you for providing Career Colleges Ontario (CCO) an opportunity to respond to the F-P/T Consultations on the Labour Market Transfer Agreements.

CCO will not be responding to all aspects of the consultation and will focus on the section entitled Impact (what do we need to do now).

### **Background**

Career Colleges Ontario (CCO) is a not-for-profit association that was established in 1973 to advocate on behalf of private career colleges in the province.

The association's purpose is to help governments, key decision makers and the public understand the critical role its members and their students play in supporting Ontario's post-secondary education system and improving the province's economic well-being.

CCO currently has a membership of over 240 career college campuses, which represents just under 50% of all of Ontario's career college campuses.

CCO members contribute to Ontario's economy by providing highly qualified graduates in hundreds of essential, skilled fields such as Applied Arts, Business, Healthcare, Human Services, Information Technology, Services and Trades.

Career colleges work closely with employers to get their graduates directly into the Ontario job market.

As pointed out in a national study by Malatest & Associates in 2008, career college students differ, demographically, from students enrolled in the public sector. Career college students were found to be typically older, more likely to be female and to represent a high number of minorities.

Students of career colleges are looking typically for flexibility in their training and want to become job ready. Our intensive program delivery model allows students to be job ready in a quicker period of time.

## **The Discussion Paper**

The purpose of Labour Market Development Agreements according to Employment and Social Development Canada is “To help unemployed Canadians quickly find and return to work and to develop a skilled labour force that meets current and emerging needs of employers ...”

The discussion paper makes several observations with respect to the challenges facing—among others—older workers, immigrants, youth and people with disabilities, to adapt to broader shifts in the labour market.

It references several objectives that labour market transfer agreements should meet so as to respond to the needs of Canadian workers. Some of those have a direct correlation with the expertise provided by Ontario’s career colleges, including:

- Promoting access to employment and skills training programs and services to support the successful participation of underrepresented groups in the labour market, including persons with disabilities, youth, immigrants and Indigenous Canadians, while promoting broader economic and social inclusion; and
- Strengthening connections between post-secondary and training institutions to ensure responsiveness to employers’ needs, now and in the future.

Career colleges are well suited to meet these needs and in some cases, for example with Second Career, have been able to contribute to helping Ontarians meet these objectives. Career colleges have provided the majority of Second Career training (between 60%- 65%) in Ontario.

However, barriers exist within Ontario’s post-secondary sector that have limited the ability of the province’s career colleges to maximize their contribution. These include:

1. An arbitrary \$10,000 cap on the amount of tuition that Ontario will fund for an unemployed adult to attend a career college program of study, whereas in many cases, the same student could receive full funding for tuition in excess of \$10,000 when attending a publicly funded institution.

The imposition of this arbitrary cap has significantly reduced the options and freedom of choice for Second Career students to attend the most appropriate post-secondary institution.

2. The Canada Student Loans Program has had a loan program for students who wish to study on a part-time basis.

Students attending Ontario's career colleges were eligible for funding under this program until July 31, 2010, when Ontario introduced its own part-time loan program, which includes the Part-Time Canada Student Loan and associated grants.

However, when Ontario introduced its program, it excluded students of career colleges, notwithstanding their programs meet the criteria of Part-Time Canada Student Loan and associated grants. The program eligibility criteria are, and have been, that the program must be approved as a full-time degree, diploma or certificate program, and delivered by a designated institution. The program must be a minimum of 12 weeks, in a 15 week period.

The arbitrary exclusion of career college programs restricts the flexibility that students need when enrolling in training programs.

3. Approximately 177 career colleges in Ontario offer a total of more than 960 programs in trades and pre-apprenticeship training across 51 Ontario communities.

Notwithstanding the thousands of trade graduates that career colleges educate, career colleges have been excluded from having a voice within the Ontario College of Trades, and graduates of their pre-apprenticeship programs have not been given automatic credit towards apprenticeship programs.

Moreover, there has been only limited approval of career colleges as Training Delivery Agents for apprenticeship training.

4. Ontario has created an Ontario Qualifications Framework (OQF) to provide a complete framework covering all post-secondary credentials, including career colleges.

Career colleges are currently excluded from the OQF and, as a result, from OnCAT. This impedes academic mobility for graduates across and between programs offered by different public and private institutions. In some cases, the credentials of graduates from programs that are equivalent to those provided by community colleges are not accepted, forcing students to repeat the same training.

The absence of career colleges in the OQF also prevents employers from understanding and recognizing the learning outcomes of graduates of career colleges and recognizing the equivalency of career college programs to those offered at community colleges. Many employers, including the Federal Government, have hiring practices in place that disadvantage graduates from career college programs of study by insisting that applicants hold a two-year community college diploma.

5. Educational programs offered to students within Ontario's post-secondary sector often include an internship. Internships are not intended to be paid for by employers, as they are part of a student's curriculum.

Ontario's Employment Standards Act specifically excludes public colleges and universities from having to meet specific requirements to be considered an exempt internship, such that employers do not have to compensate student interns.

Career colleges are not exempted under current legislation with the result that employers risk having to compensate student interns from career colleges.

This works as a disincentive for employers to host career college students on internships as part of their programs of study.

### **Conclusion**

The Discussion Paper poses several questions about the purpose, flexibility, access, and employer needs with respect to job training.

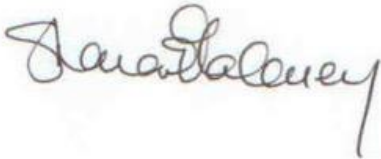
Fundamental to maximizing the impact of Labour Market Development Agreements must be the recognition of the need for integration and leverage of our existing post-secondary institutions, including Ontario's career colleges.

Investing in job-ready training for the Discussion Paper's identified groups would only be enhanced by recognizing and leveraging the role career colleges play in making their students job-ready.

Moreover, career college graduates save taxpayers more than \$1 billion per annum. At the same time, the career college sector generates more than \$94 million in business and payroll taxes. The sector is efficient, productive, flexible, innovative and accountable. It is able to shape and expand its programming to quickly adjust to market forces, thereby complementing the educational offerings of the other members of the post-secondary education system.

What needs to be done now is to remove the provincial impediments for Ontario's career colleges so they can act as stronger partners in helping Canada and Ontario develop and sustain a skilled labour force to meet the demands of today's global marketplace.

Yours Truly,

A handwritten signature in black ink, appearing to read "Sharon E. Maloney". The signature is written in a cursive, flowing style.

Sharon E. Maloney  
Chief Executive Officer  
Career Colleges Ontario