Consultation Session Part II for the Regulation of Private Career Training in British Columbia Language Schools, Vancouver Session

December 2, 2014

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**Session Summary**

Representatives from organizations that deliver private career training were invited to provide their perspective on a series of questions in the areas of quality assurance standards, risk-based approach and administrative requirements to inform the Ministry of Advanced Education’s new regulatory oversight of the sector.

**Participants**

_Representatives from the Private Career Training Sector_

Linda Auzins  Languages Canada  
John Boon  Dorset College  
Hugo Brent  Sol Schools Vancouver  
Amanda Cabrera  PGIC  
Tina Cacciatore  Columbia College  
Monica Choi  Loyalist Group Ltd.  
Lane Clark  Canadian College of English Language  
Matt Collingwood  Tamwood International College Ltd.  
Mark Cothey  Eurocentres Canada  
Camilla Dietrich  ISS Language and Career College of BC  
Kevin Drager  Education & Training Employees Association  
Laura Haseley  VGC Language School  
Tymon Hsieh  inlingua Victoria College of Languages  
Paula Jamieson  Global Village Victoria  
Lawrence Keenan  CSLI Vancouver  
Erin Kourelis  iTTTi Vancouver  
Cindy Kwon  Vanwest College  
Jaimy S. Lang  Vancouver International College  
Rosa Lenihan  Quantum Learning Academy  
Christina Margraf  International House Vancouver and Whistler  
Stephen McDaniel  Vancouver English Centre  
Melissa McDonald  King George International College  
Ian McKinnon  Sprachcaffe-GEOS  
Cameron Metcalf  CET Vancouver  
Steven Nicholson  Language Studies International  
Richard Novek  ILSC Education Group  
Gonzalo Peralta  Languages Canada  
Katherine Perez  Zoni Language Centres  
Susan Priebe  English as a Second Language International  
Anna Raposo  SELC Canada  
Peter Di Santo  ILAC International Language Academy of Canada  
Frances Seaton  St Giles Vancouver
Participants Continued
Kristina Stewart  Stewart College
Dan J. Tidsbury  Cornerstone Academic College/Western Town Business College
Ryan Tierney MBA  Little Mountain Learning Academy
Mike Walkey  ESL Language Centers
Grace Yang  Global College

Ministry of Advanced Education Staff
Claire Avison  Assistant Deputy Minister, Sector Strategy & Quality Assurance Ministry of Advanced Education
Christine Massey  Executive Director, Sector Core Review, Ministry of Advanced Education

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Monica Lust  Registrar & CEO

Session Leader
Ian Curtin, M.T.C., B. Comm. Dip. C.
President, IC Possibilities Consulting Inc.
Storyboard Record of Session

1. Proposed new regulatory approach

How would regulation of private language training institutions differ from the regulation for private career training institutions?

- Follow existing accreditation standards
- Already following
- Continue to do so

Sit under “DISTINCT LEGISLATION + NS” run smoothly

Language training legislated as separate & distinct from private career

Follow the Manitoba example of Bill 24, the international education act

Language schools need to make many minor changes to courses to adapt to needs

DON’T change or require accreditation for minor changes

If it ain’t broke, don’t fix it — CASH grabs!

LC. Language Schools have a better track record than PCTIA

IF AT THE HEART OF STATE PROTECTION, ALL IN PLACE

LC. at the heart of state protection, all in place

Government previously recognized language schools as a bad fit with career schools, now it has changed

LC. Accreditation is already the most efficient & streamlined protection for students & language schools (a subset of schools)

Regulating only a subset of language schools hurts BC’s industry
1. Proposed new regulatory approach

How would regulation of private language training institutions differ from the regulation for private career training institutions?

- **No Student Loans**
  - Language training is internationally and nationally competitive, not sensitive.
  - Consider the competitive nature of the language industry.
  - Private career schools have a market for these programs.
  - Less risk.
  - No SARA funded programs.

- **No Danger of Loan Default**
  - International students may not have the same loan default risk as domestic students.

- **Private Lang Schools Host International Students**
  - Not domestic students.
  - Different demographic.

- **Canadian Institutions**
  - Need to recognize international students.

- **Language Schools**
  - Are not for short-term students.
  - Are for long-term students.

- **Recognize**:
  - Most students are internationally and not domestic.
  - Not only provinces, but also Canada.

- **C T Dema**: 1 year, 2 and 4 years.
  - No more formal.
  - No need for institutions to be regulated.
  - Risk is lower.
  - Can apply to ESL.

- **If it is broke, recognize it**
  - Need to recognize that some programs are not viable.

- **Many short-term students are not on study permits**
  - Are here for a learning adventure, which includes accommodation.

- **We have continuous intake**
  - Language schools are training institutions.
  - We attract students from around the world.

- **Uploading Each Graduate to DeGroote**
  - DeGroote is a larger burden than for career training institutions.

- **International is not domestic**
  - Most students are on visitor/foreign visas.

- **Private Long Schools Host International Students**
  - Not domestic students.
  - Different demographic.

- **Scary Student Intake**
  - Different course duration.

- **Recognize**: Most students are internationally and not domestic.
1. Proposed new regulatory approach

How would regulation of private language training institutions differ from the regulation for private career training institutions?

- Students are not covered by accreditation from an accredited certificate.
- We don't have prerequisites.
- Language school teachers are more academic.
- A large volume of our students seek higher academic pathways.
- Language programs funded by parents and international scholarships.
- Language programs funded by students and student loans.
- What's the definition of quality and security of institutions (financially)?
- What's the role of the international agency channel regulating results?
- Make the fees collected by agents transparent to the students.
- Voluntary roll in does not exist.
- 50% is covered by threat of lost language.

- Different qualifications for program instructors.
- Language students have different objectives for study.
- Language programs do not have academic requirements.
- Language school teachers as teachers, different standards (they're not).
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1. Proposed new regulatory approach

What would be additional or different policy objectives for the regulation of private language training institutions as compared to the objectives stated by the Ministry for the regulation of private career training?

For quality assurance, student consumer protection, streamlined administrative processes?
2. Risk Based Approach

What are the factors to consider when evaluating the risk status of a private language training institution (e.g., financial instability, high % of complaints, poor compliance history)

- LC MODEL
  - Protects students
  - Allows course completion
  - No burden to government
  - Can demand high
  - Not burden to invest

- An industry
  - Specific fund separate from other

- Years in business
  - Canadian ownership

- Higher fees + audits
  - Increase financial risk
  - Instability

- Consider historical data & examples for maintaining risk

- Percentage of complaints and degree/severity/are they unresolved?

- No true way to measure % of student complaints

- Let LC take the risk

- Languages Canada
  - Numbers are already at lower risk

- History of taking in students shows strength

- How will the ministry determine or measure known instability and what additional costs will this impact for the institution?

- Requiring more reporting, paying penalties + further fees puts an at-risk institution at further risk
2. Risk Based Approach

What are the factors to consider when evaluating the risk status of a private language training institution (e.g., financial instability, high % of complaints, poor compliance history)

- Reduce Suspectivity
  - AM FOR CLARITY
  - CONTINUITY & KNOWLEDGE
  -ABLE AND STAFF

- Subject Matter
  - EXPERT

- Consider Outcomes
  - ALL THE WAY THROUGH
  - LOSS OF JOBS IN ON

- Allow for Seasonality
  - (Challenging staff, student costs, revenue & expenses)

- Use of Agents
  - IS NOT A RISK FACTOR

- Fairness
  - The number of agents a school uses can increase the risk

- Reliable
  - Replicable
  - Agents are indicative of a lower risk institution

- Schools with a larger agent pool are at lower risk as regular impact of financial downturn from one of these agents is low

- Schools with large numbers of agents have established systems in place to manage & discipline poor behavior of agents

- LC regulations ensure agents follow school guidelines: risk of fraud
3. Administrative Requirements

What should an institution's risk status be used for:
- setting fee structure?
- determining reporting requirements and schedule?
- establishing standards to be met?

Other?

Determining reporting requirements
- LC has institute report more frequently, but not with major additional cost
- Paying fees does not lessen risk

Stronger Ministry Requirement to open language school or protect the name "school"

2. Risk Based Approach

What actions do you think are appropriate for private language training institutions at risk
(i.e., requiring additional financial security, increased compliance monitoring, more frequent financial reporting, restrictions on operation)?

LC student protection model works for students and institutions
- No need for further oversight

Compliance monitoring should be carried out by industry experts

Low-risk institutions should be able to complete a more simple registration/accreditation process (like Alberta + NS)

Remedy period good actors may suffer external shock: Consider impact immediate restrictions may have

For now LC schools require equivalent level of risk abatement

If we raise entry barriers by reducing unreported language training we reduce overall risk to legitimate private language schools protecting quality reputation

More monitoring
2. Risk Based Approach

What considerations would be appropriate for institutions considered to be low-risk?

- Low risk. Lower fees, reduced fees, or Accred. Fee
- Low risk. Status should be visible to students on PCTIA site
- Low risk. Status must be easy to gain as it is to lose
- Consideration for experience
- Compliance at peak seasons (summer)

A pass for LC Schools until they err
3. Administrative Requirements

What factors should be considered to categorize a “small institution” versus a “large institution”:
- # of students?
- Tuition revenue?
- Institutional risk?

**Small Business vs. Large Business**

**Small Business**
- Support for Small Schools
- Small Business
- # of weeks vs. Size of Institution
- Small vs. Large Week

**Large Business**
- Chain School vs. Small vs. large
- Small vs. Large Affected by Students
- Small vs. Large
- Students are domestic vs. International
- Large vs. Small
- Large = LC
- Small = Others
- Some LC Schools are Small
3. Administrative Requirements

For private language training institutions, where do you see opportunities for coordination with EQA requirements and processes?

In terms of requirements + processes, EQA provides nothing in addition to what LC provides—should add value.

EQA eligibility should come with LC accreditation as per previous MOU (LC/BC).

Faculty do more to protect quality than admin. We want a voice.

Offer SABC to citizens needing ESL and simplify the SABC process.

LC is not representative of all stakeholders in private language training.

EQA needs to directly address agents, recruiters, and provincial requirements.