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Memo

To: Standing Committee on Finance and Economic Affairs of the Legislature of Ontario

From: Frank Gerencser, CEO

January 26, 2022

triOS College is Ontario's largest Private Career College. This year we will be celebrating our 30th anniversary of training adults for new careers. We have 8 campuses in southern Ontario, offering 48 different programs across five faculties. Our Eastern College division is the largest Private Career College in the Maritimes, operating four campuses in New Brunswick and Nova Scotia. We also have partnerships with Sault College in Brampton and Toronto and Mohawk College in Mississauga. Currently we are educating over 5,000 students in Ontario.

Our student population are adults with an average age of 33, and approximately 65% being women. Over 25% of our students already have a post-secondary degree or diploma. They come to us to get the skills they need to start new careers.

In total, over 40,000 students have attended triOS College in thirty years. We are proud of the work we do as shown in our Mission: Helping Students become Job-Ready Graduates.

Private Career Colleges in Ontario

There are currently more than 600 Private Career Colleges in Ontario. Career colleges are not new; in some form or another, career colleges have existed in Canada since before Confederation. We are regulated by the Ministry of Colleges and Universities, and we are the most heavily regulated branch of the Post-Secondary Education sector in Ontario.

Private Career Colleges play an important role in the Post-Secondary Education sector in Ontario. Often, we can respond quicker to job market needs than our public counterparts. Also, we can educate our students quicker than in the public system while still maintaining the high-quality education that the job market today demands.

We take our responsibilities to educate our students seriously, and we are constantly working to ensure that our students receive a high-quality education that allows them to re-enter the workforce as a job-ready graduate.

Every program that is offered at a Private Career College is explicitly approved by the Ministry, and we take compliance with the rules and regulations very seriously. That said, Ontario is beginning to fall behind other jurisdictions in Canada when it comes to how we regulate and manage Private Career Colleges.

Recently, the Province of Alberta announced changes to its regulatory regime that has seen the amount of time it takes to approve new institutions and new programs reduced by up to 70%.

There are three issues that we would like to bring to your attention:

- The first is changes to the Co-operative Education Tax Credit that would level the playing field between public and private institutions
- the second is some of the red tape that gets in the way of schools like ours responding to market demands
- and the third is changes to the Ministers Binding Policy Directive on Public Private Partnerships that would allow rural and northern Colleges the chance to compete for international students with large urban schools

Co-operative Education Tax Credit

The Ontario Government has offered a Co-operative Education Tax Credit since 2007. This credit is made available to eligible Ontario employers, who employ students for a co-op term.

However, to be considered eligible for the tax credit the employer needs to employ a student from an Ontario College of Applied Arts and Technology or from other named institutions, such as the Mitchener Institute. They do not qualify for the tax credit if they employ a student from a Private Career College.

We would like the province to change the act to allow employers who hire students from Private Career Colleges, like triOS, to qualify for the tax credit. The change would be as simple as adding the words any recognized post-secondary institution in the Province of Ontario into the legislation.

This would take a step towards leveling the playing field between public colleges and Private Career Colleges. This would help students who attend our school in finding paid co-op placements.

Red Tape Reduction

The Private Career College sector in Ontario is among the most heavily regulated in Canada. While we appreciate and applaud the government for due diligence when it comes to regulating our sector, we believe that the level of red tape involved in getting new programs approved hampers our ability to meet market demands in a timely fashion. Our mission is to produce job-ready graduates to meet the job market needs of today and tomorrow. Excessive red tape inhibits that.

The province recently announced that they are changing the PARIS (Program Approval and Registration System) IT system that was never designed to support a school the size of triOS. We believe the recently announced changes should be helpful in removing many of the inefficiencies that had plagued the approval system.

One issue that comes up often and is a hinderance to us in meeting market demands is the need to get letters of intent to hire students from new programs before they are approved. This is a very time-consuming task that slows down our ability to bring new courses to market and does not recognize that the demand for these positions may not exist yet, but we believe they will.

triOS appreciates that we are graded by the province on how many of our graduates find work in the field we trained them in, but we believe letters of intent do not do anything to ensure that will happen with new programming.

The trend in other jurisdictions across Canada is to eliminate as much red tape as possible for post-secondary institutions to meet their market function and bring new programs to market quicker to meet the demands of a fast-moving job market. For example, in Alberta, the Provincial Government recently announced that they were reducing the amount of information they require to approve new programs by 70 percent and have shortened approval times to 20 days for a diploma program and 40 days for a degree program. For comparison, currently in Ontario it takes between 9 and 16 months to have a new diploma program approved. These changes will make Alberta based post-secondary institutions leaders in responding to market needs and developing innovative programming.

The approvals process in Ontario should be reconfigured so that once an institution is approved for delivering distance education it should not need to seek reapproval for every program.

Distance education has become critical during the Covid pandemic. It also highlights one large red tape issue in our sector.

When a college like triOS applies to deliver a new program through distance education the Ministry requires that we hire a Distance Education (DE) Assessor to ensure our distance education platform can support the new program. This is costly and slows down the approvals process. Rates for a DE Assessor are between \$450-\$1200 per program and we select the Assessor from a list provided by the Ministry. This needs to be done for each program or subset of each program.

As an example, we recently applied for an Information Technology Professional program. It has 3 subsets of programs that are included within the longest version of the program. Each program has an internship option. Each program (now there are 8) needs to be submitted separately and if we want to offer them as Remote, we need to add the DE assessment.

Cost wise that works out to be $8 \times \$450 = \3600 (at a minimum – but could be as high as \$9600) just for the DE assessors. Add to that the SME (Subject Matter Assessor) and the AEA (Adult Education Assessor) and you can triple that fee again.

A solution would be for the Ministry to approve the distance education platform once for the institution and not every time that institution applies to use that same DE platform for a new program. *The current model is the equivalent of needing to get a car safety approved before every destination it goes to when it's the exact same car – this makes not common sense.* This is going to become a larger issue because post-Covid, we expect that we will be offering most of our programs through distance education and the need for DE Assessors will create a tremendous red tape burden through the application process.

Again, the right solution is to approve the platform once and as long as the institution attests that they're using the same platform in a checkbox of an application, they never need to do this again. Schools like

triOS use industry-leading D2L Brightspace for our Learning Management System – the same D2L that is approved by entire school boards, provinces and states. FYI, D2L is a Canadian success story based in Kitchener.

Public-Private Partnerships

triOS has partnerships with two public colleges. We partner with Sault College to educate students at campuses in Brampton and Toronto. We also partner with Mohawk College at a campus in Mississauga. These partnership campuses focus exclusively on educating international students.

Our partnerships adhere strictly to the Minister's binding policy directive on public private partnerships that strictly regulates how our partnerships operate.

These partnerships have been an overwhelming success. They offer potential students the chance to study with other international students with the knowledge that leaders in public education, like Sault and Mohawk, are backing them. These partnerships also allow the public colleges to expand into markets outside of their home cities, while still offering tangible benefits to their home campuses.

Students that attend our partnership campuses are considered students at the public college partner, as the public college does the recruiting, handles the payment of fees, and issues their diplomas. The private partner provides the education and student services. Any profit the public college makes from the partnership must be spent on the home campus.

Our partnership in Brampton and Toronto directly benefits the students who attend Sault College in Sault Ste Marie.

One of the issues is that under the Ministers binding policy directive, currently partnership campuses are allowed to enroll two times the number of international students that the public college's home campus has. So, if Sault College has 1000 international students enrolled at the Sault, the partnership campus can enroll 2000 students.

This enrollment limit adversely impacts small and rural colleges disproportionately. For example, a large urban college operating a partnership agreement will have the ability to educate many more international students because their base of international students is so much larger than a small rural or northern college.

We would propose is that the limits to be raised to either 3,000 students or two times the home campus population, whichever is greater. This would give smaller northern and rural colleges an ability to compete for international students with larger urban campuses and at the same time benefit home campuses.

Conclusion

Our mission is to help students become job-ready graduates. You can help us by making the co-op education tax credit fair for all students in Ontario, reduce red tape to allow us to provide a high-quality education in a way that responds to current market needs and make a small change to the enrollment model for public-private partnerships.