



COVID-19 Updates from IRCC – as of May 25, 2020

Q1: Will there be extensions or implied status allowances for international students whose study or work permit will expire in the coming weeks but that are:

- i. Unable to obtain a new passport from their embassy in Canada.
- ii. Unable to travel to their home country to get biometrics or apply for a new passport.
- iii. Unable to access documents needed to apply for a new permit from their educational institution.
- iv. Unable to access biometrics within the current 90 day period.

Q2: Will IRCC accept electronic, unofficial transcripts, as many CDN institutions are not able to issue official transcripts at this time?

Q3: To what extent can a study permit application be processed in the absence, or in anticipation, of a CAQ? In other words, if a student has submitted an otherwise complete applications, but has not yet received a decision regarding the CAQ, will their applications be processed before a decision has been rendered?

IRCC is not currently in a position to waive any requirements or to accept alternative documents.

IRCC acknowledges the challenges that applicants are facing with regards to submitting complete applications. International students in Canada are advised to apply online to extend their status before it expires, thus triggering implied status and allowing them to continue studying and/or working (subject to the same conditions listed on their expired work or study permit) while their extension is being processed. Applications should include an explanatory note detailing the circumstances that are beyond their control and DLIs should be prepared to provide letters of support and/or accompanying documentation.

No application will be refused if incomplete, however, required documents must be submitted within the 90 days. Applications should include an explanatory note detailing the circumstances that are beyond their control and DLIs should be prepared to provide letters of support and/or accompanying documentation.

Q4. Could you please clarify that the requirement to be approved for a study permit before starting online classes overseas is required only in relation to the length of study contributing to PGWP Programme eligibility?

Q5. Additionally, could you clarify that students who are overseas are not prohibited from starting their studies and studying abroad (online) without being in possession of a valid study permit/approval?

Students who are overseas are not prohibited from starting their studies and studying online (from abroad) with being in possession of a valid study permit/approval. A study permit, or a study permit

approval, is required, however, in relation to their studies contributing to PGWP programme eligibility.

Q6. Students whose SP was expired as of March 18th but had an active extension application (held an implied status). Once their extension is approved (i.e. after March 18) will they be allowed into Canada?

No, they will not be allowed into Canada as they fall outside the exemptions in relation to the Quarantine Act.

Q7. Can you confirm that international students that are now part-time or not registered for the winter semester (due to COVID 19) keep their right to work on or off-campus and for the entire summer break? (subject to authorized number of hours should they have been full-time students)

Q8. If a student has to withdraw from coursework completely due to covid-19, and remains in Canada, will the 150 day maximum gap in studies still apply? For example, if a student withdraws now, and cannot return to classes until September 2020, this will exceed 150 days. Will s/he have to change her/his status to a visitor if leaving Canada is not an option?

Q9. Will there be exemptions for students who are unable to complete required components of their studies and have to extend their study permits (because of COVID-19) but who may not meet the other criteria of their study permit (i.e. financial, 150 days)? For example, if a student is unable to complete the practical components of their education, can they extend their study permits until they are able to physically return to class to meet specific practical program requirements?

International students now part-time or not registered for subsequent semesters due to reasons related to COVID-19 that are beyond their control can continue to work on or off-campus subject to the same number of authorized hours (Please note the exemptions to limits on number of hours for essential services.) If the summer period was to be a regularly scheduled break, students can work full-time, if it was to be an academic session, they can continue to work off campus up to 20 hours a week.

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Q10. Will international students and temporary foreign workers who access the social assistance (i.e. Canada Emergency Response Benefit) still be eligible to apply for PGWP or PR status in the future?

Accessing CERB would not act as a barrier to a student qualifying for PR in the future.

Q11. Will international students entering Canada need to provide proof of health insurance at the border? In the past, this was not required, as OHIP in Ontario and other insurances were retroactively implemented to cover arrival to Canada.

We can confirm that proof of health insurance is not a requirement for study permit applications and as such there is no expectation that students provide proof of coverage upon arrival at a Port of Entry.

Q12. IRCC requires custodianship for minor students (18 years of younger for most cases) coming to Canada. For those that stay in university residence, university staff would assume the responsibility as a custodian for the minor students. But under the current COVID situation, our legal counsel is wondering if this would expose institutions to unforeseeable risks. Could IRCC clarify the risks we (both the staff member and the institution) are assuming by signing as the custodian?

Any direct impact on specific custodianship obligations would be left for the institution, as custodian, and a student's parents/guardians to assess.

Q13. Canadian institutions are having challenges producing official transcripts - access is limited and systems require onsite printing capabilities. For that reason, institutions are asking if IRCC would accept an official letter, sent from the respective institutional e-mail account, accompanied by an unofficial transcript for the purpose of PGWP applications, Study permit extensions, Express Entry applications, etc... Is this feasible? If not, what would be the recommended approach?

This has now answered in the update on the IRCC website: <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/updates/2020-covid-study-permits.html>

Q14. If an international student is unable to return to Canada in the fall, would they still be permitted to enroll as a full-time student? If they do not currently have a valid student visa – for instance, it has not yet been processed, but has been submitted – would they be permitted to enroll as a full-time student, with the condition that they must receive their valid student visa by such time as they are able to travel to Canada?

International students who are unable to travel to Canada in the fall are permitted to enroll in a designated learning institution as a full-time student and take online courses outside of Canada. A study permit is not required to start and complete programs of study outside of Canada, however, this time would not be counted towards Post-Graduation Work Permit Program (PGWPP) eligibility or the length of the PGWP issued.

On May 14, IRCC made temporary and time limited policy changes to the PGWPP for students starting or continuing programs outside of Canada in the spring/summer/fall 2020 semesters to

have the time spent studying outside of Canada (until December 31, 2020), to count towards PGWP eligibility and length of the PGWP issued, provided that the student completes 50% of their program in Canada, meets all the other program criteria, and has a study permit or study permit approval prior to commencing their program. If the student is not approved for a study permit before commencing their program, the time spent studying outside of Canada will not count towards their PGWP eligibility or the length of the PGWP.

Please note that IRCC continues to accept and process study permit applications to the extent possible and we are not refusing applications that lack a necessary document or miss a deadline for providing a document. Applicants are being advised to apply for their study permit with a letter of explanation for documents they have been unable to provide and to provide them when they are able to. This will allow IRCC to process other parts of an application and be able to finalize quickly when the remaining documents are provided.

As per the travel ban exemptions, only international students issued study permits or study permit approvals on or before March 18, 2020 can travel to Canada at this time.

In short: A study permit isn't necessary if a student wants to do a program online — already now if a program is offered 100% remotely a student is free to enroll and get the credential. They need a study permit however if they will want/need to enter Canada at one point to complete program requirements or to be eligible for the pgwp. If a student intends to stay eligible for their PGWP, they would need to be approved for their study permit before starting their program online.

Q16. If they are permitted to enroll as a full-time student from outside of the country, would they be permitted to receive the funding support they would ordinarily receive if they were enrolled full-time in-person (i.e. bursaries, grants, scholarships)?

International students should refer to the details of the funding support they are seeking to determine whether it will still apply if they enroll as a full-time student outside of Canada. In regards to Study in Canada Scholarships offered through Global Affairs Canada, the amount of funding depends on the actual eligible expenses incurred by the student. Institutions submit budgets and cash-flow statements in order to receive the scholarship funds. If a student were to start their program online, the budget would need to be adjusted to reflect it. For example, there would be no need to cover the airfare, accommodation and living expenses in Canada during this first semester. Nonetheless, tuition fees would still be charged and would be covered by the scholarship.

Most of our other scholarship programs offered by Global Affairs Canada are short-term exchanges and are based on tuition waivers for visiting international students. If these exchange students cannot travel to Canada and instead do “virtual exchanges” by taking online classes at the Canadian partner institution, they would no longer require a scholarship, as they wouldn't be incurring any eligible expenses, such as airfare, rent, or food in Canada.

Q17. Assuming no other obstacles (labour agreements, etc.) – if an international student is otherwise permitted to work as a Teaching or Research Assistant, would they be permitted to carry out that work from outside the country if they are unable to return to Canada?
If an international student is only permitted on-campus work, would they still be permitted to carry out Teaching or Research Assistant work, if the reason they are not on-campus is because they are unable to return to Canada due to COVID-19?

The Immigration and Refugee Protection Regulations, as they pertain to temporary work, do not apply to foreign nationals outside Canada. As such, learning institutions may employ foreign nationals outside of Canada in any manner they wish. Learning institutions may wish to consult with other federal departments with respect to employing international students overseas, payment of wages, and tax implications.