

The Transformation of the Ontario Student Assistance Program

*Report on the Joint Chiefs of Ontario and Ministry of
Advanced Education and Skills Development Information
Sharing Sessions*

September 11, 2017

PART 1: INTRODUCTION

In unveiling its budget for 2016-2017, the Ontario government announced significant changes being made to the way it delivers the Ontario Student Assistance Program (OSAP). Under the newly designed program, the government will replace its existing provincial assistance programs with a single, targeted, non-repayable grant starting in the 2017-18 academic year. In doing so, the Government of Ontario is aiming to:

- Provide free tuition for students from families with annual income of \$50,000 or less;
- Provide additional financial support to full-time mature and married students;
- Reduce the number and complexity of grants delivered through OSAP as there are currently over 20 different OSAP grants;
- Improve access to subsidized loans for middle-income families, by reducing parental contributions; and
- Work with post-secondary institutes to more accurately calculate net tuition and apply up-front grants directly to institutions by OSAP on the student's behalf.

The OSAP transformation will be rolled out in two phases as follows:

Phase 1 (2017-18)

- Consolidate grants.
- Increase Ontario's maximum OSAP weekly assistance limits.
 - From \$160/week to \$180/week for single students
 - From \$360/week to \$450/week for married and sole support students
 - Canada contributes \$200/week for all student types in addition to Ontario's weekly assistance
- Canada exempts Post-Secondary Support Program contributions and the \$3,000 student contribution for Indigenous students.

Phase 2 (2018-19)

- Reduce parental and spousal contributions.
- Net (or Free) tuition system in place.
- Ontario implements changes for Indigenous students.

These announced changes prompted significant interest from the First Nation Leadership in Ontario and resulted in a mandate for the Chiefs of Ontario's (COO) First Nations Education Coordination Unit to work with the Ministry of Advanced Education and Skills Development (MAESD) to ensure policy change and implementation around free tuition is easily accessible by First Nation students, communities and organizations administering the federal Post-Secondary Student Support Program (PSSSP).

From May 3rd to the 28th COO and MAESD held a series of five Information Sharing Sessions for First Nation representatives involved in supporting post-secondary education to obtain clarity on OSAP and its announced changes. The sessions were also an opportunity for First Nations to provide input and guidance for MAESD to consider in effectively addressing the needs of First Nation students, communities, institutions and organizations.

This report will provide a brief overview of the new OSAP, highlight the common themes discussed at each of the five Information Sharing Sessions and then provide recommendations to the key issues discussed during the Information Sharing Sessions.

PART 2: OVERVIEW OF THE NEW OSAP

OSAP provides financial assistance to eligible Ontario students to assist with the costs of college and university (i.e. tuition, books, living costs and transportation). It is delivered by MAESD, and includes:

- Grants, which are non-repayable funds; and
- Loans, funding that a student will eventually have to repay back to the government (loans are interest-free and payment-free while students are in full-time study).

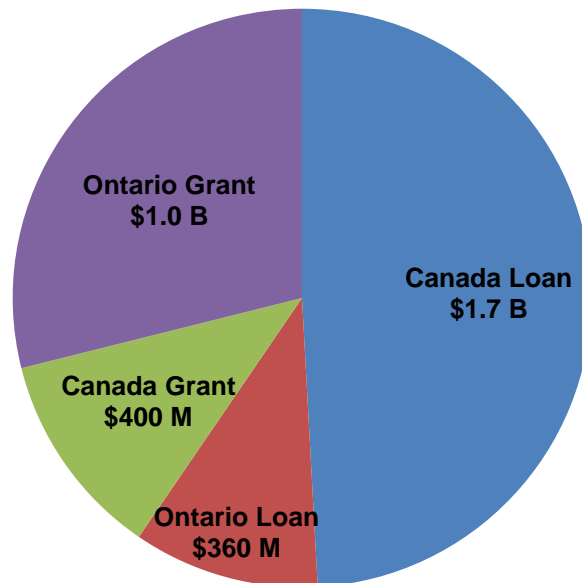
OSAP is an integrated program funded by both Ontario and Canada, and provides financial assistance to around 380,000 students a year. Students applying for OSAP are automatically considered for both loans and grants; however, students not wanting to take on debt through OSAP also have the option of taking the grant portion only and not the loans. This process can be completed online after the student receives their notice of assessment. Making this selection however will also impact the amount of assistance available to the student.

While there will be a consolidation of grants under the new OSAP, the Canada Student Grants will be administered separately from the new integrated OSAP. In addition, the following Ontario Student Grants will also be administered separately from the new integrated OSAP:

- Indigenous Student Bursary;
- First Generation Bursary;
- Bursary for Students with Disabilities;
- Ontario Part-time Grant;
- Living and Learning Grant; and
- Graduate scholarships.

In 2014-15, OSAP provided \$3.5 billion of assistance as follows:

OSAP Loans and Grant for 2014-15



Eligibility for OSAP

To be eligible for OSAP, a student must be:

- A Canadian citizen, permanent resident or protected person (definition of protected person is set out in subsection 95(2) of the *Immigration and Refugee Protection Act*);
- An Ontario resident;
- Attending an OSAP approved program or school (Ontario students can still receive OSAP if they enroll in a program offered at a college or university outside of Ontario);
- Taking at least 60% of the credits identified as a full course load (40% for students with a permanent disability);
- Maintaining satisfactory academic progress; and
- In good standing with any previous government-issued student loans.

Part-time students enrolled in 20% to 59% of a full-time course load in an OSAP approved program may be eligible for OSAP for part-time students.

Students may be ineligible to receive OSAP funding if they have a restriction on their file. OSAP restrictions typically include the following reasons:

- Student has defaulted in repayment on prior student loans;
- Student received an OSAP overpayment;

- Student failed to achieve minimum academic progress requirements; or
- Student filed for bankruptcy or a related event, such as a consumer’s proposal.

Applicants having one of these restrictions must follow the established OSAP processes in order to seek removal of any restriction on their file.

Determination of OSAP Funding

OSAP is considered an entitlement program, meaning that **no cap is set** on the number of students who can qualify for funding. However, the amount of funding a student can receive is determined based on the student’s financial need assessment.

When determining the amount of financial assistance a student may be eligible to receive, OSAP considers the following factors: student category, student’s assessed need, family size and prior year family income.

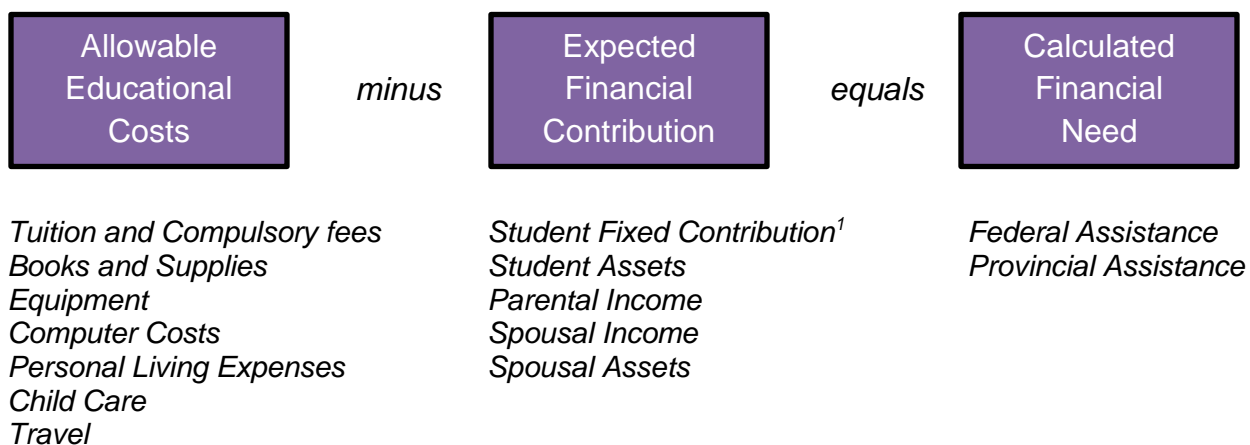
1) Student Category

This is assigned to each applicant based on their family and living situation:

- Single Dependent Student
- Single Independent Student
- Married, common-law
- Sole support parent

2) Assessed Need

This factor looks at the difference between a student’s allowable educational costs and their expected financial contribution from income, assets, as well as parental and spousal income or assets (as applicable):



¹ Not required for self-identified Indigenous applicants.

The government of Ontario considers post-secondary education to be a shared investment and responsibility between students, their families, the government and postsecondary institutions. This is why students are expected to help contribute to the costs of their own postsecondary education.

It is important to note given the sources of funding under OSAP, that when calculating a student's financial need, there are two separate calculations performed – one to determine student financial assistance available from Canada, and another to determine student financial assistance available from Ontario. The Canada portion of the students' calculated financial need entitlement is equal to 60% of the assessed need subject to the maximum, with the Ontario portion equal to 40% of the assessed need subject to the maximum. These separate calculations are however done from the one single application submitted by students.

For First Nation students, the amount of PSSSP funding they receive used to be calculated into the financial need assessment as a student asset. This meant that PSSSP funding could impact the amount of financial assistance a First Nation student may be eligible for under OSAP. Both levels of governments have committed to no longer follow this practice under the transformation changes discussed further on in the report.

The province has announced that as of 2017-18 the Student Fixed Contribution of \$3,000 will no longer apply to Indigenous applicants.

3) Family Size

Family size is considered as follows:

- Dependent Single Student: The size of the parent(s)' family: Parent(s) plus all dependents reported on the Full-time OSAP application;
- Independent Single Student: family size is 1.
- Married/Common-Law Student: Student, spouse and any dependent children
- Sole support parents: family size means student plus any dependent children.

4) Family Income

The gross income from the previous tax year is considered as follows:

- Dependent Students: parents' previous year tax year income (Line 150) plus parents' non-taxable/foreign income;
- Independent students: student's previous year tax year income (Line 150) plus nontaxable/foreign income;
- Married and Common-Law (spouse is employed or other): student's and spouse's previous year tax year income (Line 50) plus student's and spouse's nontaxable/foreign income;

- Married and Common-Law (spouse is a full-time student): 50% of student's and spouse's previous year tax year income plus 50% of student and spouse's nontaxable/foreign income;
- Sole Support Parents: student's previous year tax year income plus non-taxable/foreign income.

If a student, spouse or parent has Status under the Indian Act and has earned all of their income on reserve and do not file income tax, they may use a specific OSAP form to verify their income. They would be required to provide a payment summary from the individual's employer indicating the amount of the gross income earned and confirmation that the income was earned on reserve.

Scholarships or bursaries for First Nations students provided by a First Nation or other organization (e.g., Indspire, First Nation People's Scholarship Fund, etc.) must be reported as scholarship/award income. Scholarship and bursary income above the exemption level (typically \$1,700/year) is treated as a resource.

Converting Grants into Loans

With the introduction of the newly transformed OSAP, the Ministry will be issuing more assistance in the form of grants than loans. Some students may be issued grants that they are later determined ineligible to receive, so beginning in 2017-2018 the Ministry may convert grants into loans if:

1) ***Student withdraws from full-time studies***

Should an individual withdraw from full-time studies within the first 30 days of their study period and not return to full-time studies within five months any grants received will be converted into loans. This window of time before the grants are converted provides students with an opportunity to re-enroll in a program and receive OSAP grants before they would be required to enter repayment (6 months after their last day of study). Note that if the student withdraws within the first 30 days due to disability-related reasons or other extenuating circumstances, students can request a review to revert the loan back into grant.

2) ***Not having their income or their expected contributor's income verified within 12 months of starting class***

If the ministry is unable to verify the financial information reported by the individual and his/her expected contributors (i.e., parents, spouse) within 12 months of the student's first day of class any Ontario OSAP grant that has been issued to the student will be converted to an Ontario loan. This rule applies for each academic year for which income cannot be verified and is only applied to Ontario grants, not Canada grants. However, when there is a lower estimated income review for the student's spouse/parents, there would be 24 months to verify income.

3) *Is eligible to receive a lower grant amount as a result of a reassessment*

If at the end of the study period, as a result of an OSAP reassessment, the student is not entitled to all or part of the grants that they were issued any over awarded amounts of Ontario and Canada OSAP grants will be converted to loan. An exception is provided if the reassessment is due to disability-related reasons or other extenuating circumstances. Students in this situation can request a review to have the loan reverted to grant.

These rules for converting grants to loans do not apply to the following federal and provincial grant programs:

- Living and Learning Grant;
- Tuition Aid for Youth Leaving Care;
- Indigenous Student Bursary;
- First Generation Bursary;
- Out-of-Country Bursary for Deaf Students;
- Ontario Graduate Scholarship;
- Bursary for Student with Disabilities; and,
- Canada Student Grant for Services and Equipment for Students with Permanent Disabilities.

Repayment of Loans

Students are required to start repaying their student loans once there is a break of more than six months between periods of full-time studies (e.g. they have graduated or completed their studies, or withdrawn from full-time studies and not returned.). Repayment would then begin in the seventh month.

During the first six months, students do not need to make any loan payments, and no interest is charged on the Ontario portion of their student loans, however interest is charged on the Canada portion of their student loans for the six-month period. Interest begins to be charged on Ontario student loans beginning in the seventh month when the loans go into repayment. Current interest rates are:

- Ontario: prime rate of interest plus 1%
- Canada: prime rate of interest plus 2.5%

A borrower is considered in default of his or her obligations to repay student loans if he or she: unequivocally refuses to pay the loans; or is in arrears by at least three months as a result of failing to make monthly payments on at least three separate occasions. If default occurs, the Canada student loan debt and Ontario Student Loan debt is turned

over to separate private collection agencies. The default is reported to a credit bureau which may negatively impact the individual's future ability to access credit.

The Repayment Assistance Plan (RAP) helps student loan borrowers who are having financial difficulty making payments on their student loans. Borrowers may be approved for a reduced monthly loan payment, or no monthly payment at all until the income of the student and spouse, if applicable is greater than an annual threshold (e.g., \$25,000 a year for a single individual).

To be eligible for RAP, borrowers must:

- Be a resident of Canada;
- Have student loans that are in good standing and not be restricted from repayment assistance for other reasons.
- Have an affordable monthly payment that is less than the required monthly payment:
 - Student's affordable monthly payment is calculated based on their gross family income and family size;
 - Student's required monthly payment is calculated based on the total amount of their government student loans.

If the student's affordable payment is less than the required payment, and they meet all of their other eligibility requirements for RAP, the student will make only the affordable payment for six months. The student's reported family income is subject to income verification. The student (and their spouse, if applicable) may be required to provide supporting documentation.

PART 3: OVERVIEW OF THE INFORMATION SHARING SESSIONS

Each Information Sharing Session comprised of small facilitated group discussions focused on three separate questions. The following is a summary of the discussions that took place across all five sessions. The discussion captured has been separated into individual themes for the purpose of this report.

Question #1

The first question was a scenario involving two individuals that was meant to facilitate discussion on some of the barriers/challenges student's face with accessing OSAP.

Travel / Transportation Costs

- Remote travel calculation is an issue since most students use their funding for travel and there is 90% unemployment in remote areas (i.e. the cost of freight is a significant factor in determining what the student chooses to bring, i.e. books verses food).
- Communities are able to provide very limited funding for travel, and it will usually only be enough for a one-way trip out of the community to the post-secondary institution. The commute to cities can be very expensive, especially when combined with parking costs.
- Students who do not have the funding to return home may in turn suffer from other issues such as mental health, missing family, etc. Need to look beyond the money; this is mental health support for students to return home for ceremonies, family emergencies, hunting, spending time in the bush. Money to go home can help bolster student success and prevent high levels of stress and possibly suicide.
- Sole support parents' travel costs are even higher as they must pay travel costs for their children as well.
- The \$300 travel grant is not enough.
- Getting a car on the road is expensive.
- Travel also needs to be safe in addition to be affordable. There are usually bad roads in the winter which can affect the students travel.
- Postsecondary educational staff and professors don't understand the barriers some of these students face commuting to and from school.
- There are issues with students traveling to their placements because the areas these students live in do not always have city transit or cabs.
- More support for travel costs but more specifically monthly/daily transportation, some bus passes are \$150 - \$160 per month.
- Many communities are situated on islands and have to use a boat.

Housing / Accommodation

- At some schools, PSSSP living allowance doesn't cover the housing costs for students.

- Many students come from remote communities and have to move to attend post-secondary, while others still have to leave their community and relocate to attend post-secondary. This causes very high housing costs for these students (initial housing costs – first & last, setting up utilities, cost of housing in the new community, availability of housing in some communities, etc.). When first and last month rent is covered by the First Nation, it has to be recovered.
- If the student is a sole support parent they have to bring their children with them which make housing costs even higher as a larger residence is required.
- Lease agreements are for 12 months but funding is only for 8 months so how are students able to pay for rent in the summer?
- There are high housing costs in southern Ontario.
- Students are either forced to choose inexpensive housing that is often dangerous, or spend lots of money on rent because they need a good space to study so they can succeed in school.
- Students also need a safe place to stay while looking for rental units.
- There tends to be poor quality of housing available for students.
- First Nation student also face racism in regards to housing.
- Utility costs are high.
- Some students have two houses to maintain because they live on reserve but have to live away for school/work.

Connectivity

- Rural and northern communities are often affected by poor internet infrastructure, slow speed and data constraints. (i.e. In Fort Hope, some students need to get up at 3AM to submit assignments because the internet is slow).
- Students can't afford internet access. They often face slow internet speeds or having to travel to the closest library or the local Tim Hortons for internet.
- Computers can be difficult to access at community libraries due to demand or maintenance issues.

- Internet access issues make it difficult to access the OSAP application.
- First Nations do not necessary have public space for students to access and apply to OSAP online.
- Technology is a barrier across the north (i.e. computer costs, internet costs).

Disbursements and Budgeting

- Mandatory financial literacy courses should be required for high students, to help students learn how to budget and invest, and develop good financial skills.
- There should be more disbursements instead of 2 large ones.
- Concern that students with budgeting issues may not use the funding for school.
- The current timing of the two OSAP disbursements creates a barrier for students who need assistance paying for rent (i.e. first and last months).

OSAP Application Process

- Difficulty filling out the application, many students need support in applying for OSAP since some of the questions can be challenging. For many students the OSAP application is new and for other students there can be a general discomfort with filling out the forms. Capacity challenge in communities means Counsellors don't always have time or adequate training to sit down and help with OSAP applications.
- The parental tax information on the OSAP application is a challenge as some students cannot get this information, for example if the students' parents are no longer in contact with the student. Some called this punitive for those who do not have relationships with their parents.
- If you want to dispute parental income, it is only available for those with proof of a family breakdown. That is a very intrusive review process. Who decides what is acceptable in terms of family breakdown? Some students would be revealing abuses and may have never spoken about it before. Concern with who might be seeing these reviews?
- High rates of child apprehension and kinship arrangements in our communities. Many of our youth are in customary care agreements informally, in that it is not formally documented. Whose responsibility is it to fund their education in this case? Will they still need their biological parents' income, because they are not formally documented as being in the care of someone else?

- We also have many transient youth, who will not have the ability to verify parental income.
- Concerns around overcrowding this being the reason someone left home? How is the parental income applied in these cases?
- Questions about non-taxable income create challenges when individuals are not filing taxes. Chief and council often do not have the additional capacity to provide letters for the OSAP income verification process in these cases.
- There is mistrust with the application that results in some not wanting to share income information.
- Obtaining government issued identification is a unique barrier to remote and northern rural communities as they must travel to the nearest Service Ontario office to obtain their identification. However that Service Ontario office might be 100km or more down logging roads, and sometimes the only form of access is via air or water to the nearest one. Internet service is unreliable in many northern communities and is not easily accessible.
- Students think that OSAP means just loans. Suggestion that a promotional and marketing strategy be developed so students are fully informed of OSAP. Conduct workshops earlier to create awareness.
- Students have to apply for OSAP to be eligible for the grants and even though they don't have to accept loans, they are very fearful of getting the loan. There is a need for real clarity around not having to take a loan.
- There is also a need for clear communication regarding the possibility of a grant becoming a loan if the student drops out, fails or doesn't complete the program.
- For some, the application itself is too long which will create a barrier for them to apply all together.
- Under the Canadian citizenship question, we should define what "others" means. Also, for the Canadian citizenship requirement do you have to identify as such to apply? Many students do not identify as such.
- It should be noted if English is not a student's first language, that assistance will be required for them to complete the application.

- Self-identification concern in that a non-Indigenous student may try and take advantage of this and deter First Nation students from self-identifying.
- What about royalties, land-settlements, and in-trust funds? What about mining revenues? Are these considered resources? This is money owed, and should not be considered income.
- Upfront fees for application are a barrier if there are no resources available to students or education counsellors to cover these.
- Could we make a paper version of that quick calculator that is online?
- There are families that make too much but still can't support the student.

Upfront Fees and Other Student Costs

- Living allowance supports are not enough. The expectation is that the student works while at school, which takes away from studying.
- Insufficient living supports can also result in poor nutrition for students.
- Many students will have multiple up-front fees to be paid that the communities are unable or only partially able to assist with (i.e. application fees, criminal records check fees, training for program requirements, program deposit, residence deposit, etc.). It is difficult for communities with limited PSSSP funding to find the funding to assist with these fees, and they are unable to provide the funding for the fees upfront.
- Tuition deposits are a problem and pose as a barrier for students. Deposits are due before PSSSP and OSAP is processed, so they don't have cash available when they need it. If the student is going to live in residence they may also need a \$1000 deposit – which they often don't have yet as well. Students also don't know about opting in/out of fees.
- It is discouraging for students to work hard for merit based bursaries and scholarships from institutions and other Organizations (i.e. Indspire) only to have them clawed back by OSAP.
- Communities do not fund summer months, creating issues for those students who cannot return home during those months.
- Residence and meal plans are very expensive, and even with other funding, students still have to pay for the remainder and that leaves students with no money left.

- Crown wards, students with special needs, students with disabilities; there is limited funding or none at all for these students. Some students with special needs cannot afford the costs to be assessed.
- Not enough funding and support for child care costs. Sometimes students have to leave their children behind to attend school. Students are often forced to use their savings to cover some of these costs.
- Application fees from Ontario College Application Service (OCAS) and Ontario Universities' Application Centre (OUAC) can get very high, up to \$450 in one case. Students often don't have the funds yet to cover these.

Grants Converting to Loans

- Historical incompleteness, the difficulty of returning to school for some students and the impact this can have on OSAP grants being converted to loans.
- Some First Nations will not endorse students being “at risk of debt” with the grant to loan conversion.
- For those who have used OSAP before and still owe money, there will be difficulty in steering them back to post-secondary studies.

Coordination of all Support Services to Students

- Lack of communication between Financial Aid Officers and Education Counsellors. Better communication here would mean more support for students.
- There is concern regarding the lack of communication between the OSAP office and First Nations because any changes being made by OSAP will ultimately impact policies at the community level. There is a need for further work on developing processes and communication mechanisms between the two.
- Institutions are collecting data on learners but they do not share this with the communities. Communities want to know who the students are, who are accessing OSAP.
- How will we even know if students apply for OSAP?
- What are the true costs of living and education? Can we establish base amounts for each area?

- Some community partners have had a really hard time with Ontario Works off-reserve, wondering if it will be the same for OSAP?
- Concerns with whether or not clients who are on Ontario Works will be able to keep their drug cards if they go on OSAP?
- Would there be the ability to cost-share with OSAP? This would help with some of the barriers such as paying for two residences, child care, cost of relocating families, etc.
- Questions around how the Aboriginal Skills and Employment Training Strategy (ASETS) funding work with OSAP? ASETS money is delivered bi-weekly and is based on attendance by the student. Is there the same level of accountability for OSAP?
- There is a general lack of knowledge around OSAP with Education Counsellors; some communities don't always have all the information necessary to pass on to their students. Further, not all communities have Education Counsellors and the ones that are there tend to already be busy without taking on the role of managing OSAP.
- Students will not advocate for themselves; Indigenous Student Support Offices will often do this for students, the student simply isn't aware.
- Some felt they are being asked now to adjust their policies, rather than being involved from the beginning to determine how OSAP could work with existing policies.
- Some felt that having students seek OSAP grants and then supplementing that with PSSSP was a concern due to treaty rights and would ultimately diminish the fiduciary obligation of the federal government.
- Strong concern was expressed that increasing access to OSAP will negatively impact our ability to secure stable and predictable funding based on need through the federal PSSSP.

Question #2

The second question builds off the first one in asking participants for their input on how the ministry can reduce the barriers/challenges discussed around question #1.

Travel / Transportation Costs

- Having a special fund to help cover the unique travel and housing costs that these students are faced with would be very beneficial and allow them to still have regular contact with their home communities.
- Needs to be emergency funds for students to return home for ceremonies, family matters, bereavement, etc.
- Travel grants to return home should be on a sliding scale according to need. For example, a student from a Northern community would have more of a need than a student from a southern community.
- Would like OSAP to offer support as this is an issue for First Nation communities (i.e. one community in particular had a bus for their students and now they are looking into a van).
- Suggestion for \$1500 travel grant per semester as a good support system.

Housing / Accommodation

- Should be more investments to student housing.
- Variability of rent, OSAP should factor this in as part of their needs assessment.
- If a First Nation were to purchase housing where students often attend school, the students could rent from the First Nation, making it more affordable and reducing amount of discrimination when looking for housing.

Disbursements and Budgeting

- Suggestions for increasing frequency of OSAP disbursements:
 - Monthly disbursements (i.e. if community funding is disbursed at the beginning of the month then have OSAP disbursements at the end. Some students are required to pay for first and last months' rent, so this would provide students with the assistance they need).
 - Provide disbursements three times per term.
 - Disbursements could be quarterly.
 - Send to the First Nations to manage.
- Financial literacy needs to be addressed while still in high school. Discussion around an existing program in one area that gives high school students a credit to understand how to budget, live in the city, cost of groceries, etc.

OSAP Application Process

- It was agreed that identification was a requirement and should be asked for prior to funding. It was agreed that Status Cards were available to all students and were an easy way to identify their First Nation status. As they had to provide a lot of information to the government prior to receiving these cards, it would be helpful if the status card could also be used as proof of Ontario residency.
- For the self-identification question on the OSAP application suggestion to have a pop up box where the student can identify their communities. Should have some type of identifier on OSAP where students identify what First Nation they are from.
- Suggestion to include a First Nations specific webpage on the OSAP main website where First Nations students can click on the link to access the application page and have resources listed within the page.
- Application and process needs to be simplified.
- Solution for capacity in communities could be to refer students to the Aboriginal Resource Centre at whatever institution they are attending for help. Capacity could also be provided to communities in order to work with the new process (i.e. postsecondary counsellors).
- Make OSAP information accessible to high school students and make it part of the curriculum i.e. civics and careers courses.
- There has to be a better campaign to inform students that OSAP is not just loans, that there is an option for grants only.
- A frequently asked questions sheet that the Education Counsellors can provide to their students regarding OSAP funding and the application process would help to alleviate the higher burden brought on by encompassing a new funding program.
- Most, if not all, students will want their Education Counsellors to work with them in filling out the OSAP application. This is a new and confusing process that will take up a lot of time and effort. Maybe each community can book a time for a webinar where they connect with OSAP staff and do a walk-through of the applications process. Students not living in the community can connect to the webinar or via teleconference from their own location.

Upfront Fees and Other Student Costs

- Mental health services/counselling should be covered in OSAP funding.
- Tutoring should be covered by OSAP funding.
- Living allowance doesn't go very far, an extra \$100 extra per child would help.
- Additional funding from OSAP may free up some PSSSP monies that can be reallocated to helping students with these fees.
- Suggestion to have the OSAP dollars administered by the First Nations and have more provincial funding going to First Nations for more support for their students.

Grants Converting to Loans

- Feel repayment of federal loans is unfair, that it interferes with treaty rights. . OSAP is a needs based program and First Nations view education funding as rights based.
 - Can there be an exemption for this?
- We want our membership to know the grounds for having grants converted to loans. There should be a redirect page on the OSAP website that explains the grant to loan conversion that you have to read before you can accept the grant money.
- Repayment should be tiered, like taxes, and according to income.
- If the province has all this extra money it should provide money to First Nation communities who can then provide it directly to their students rather than having a loan hanging over their head.

Coordination of all Support Services to Students

- Need increased data sharing. If we jointly develop statistics this will help demonstrate success rates and the needs for post-secondary funding.
- There should be better coordination of funding.
- Concern about who the ministry is talking to; Indigenous students who are on OSAP? That's who to talk to. Have you talked to Indigenous students about changes you're making? Talk to the Counsellors at the institutions about this, that

is who would be providing the central support for OSAP. Bands are administering their funding.

- Suggestion to have free tuition for all students in Ontario. Once they are accepted to the school then the student would have their tuition covered by the government. This way the First Nation can invest funding to students on other costs and more students would be able to attend postsecondary institutions. First Nations would then be able to increase their funding for students living allowance and transportation.
- Suggestion that perhaps career action plans would be helpful so we aren't just sending students in blindly.
- All communities will have to go back to discuss how they can make changes to their policy so that OSAP is incorporated into their current PSSSP policy so that a cohesive collaboration of funding can be achieved. There should be financial support from the province to the First Nation to assist with making policy changes.
- We need policies revisited to make it work cohesively between the province and the First Nations.
- Suggestion to develop a system where you could have a specialized First Nation, Métis or Inuit staff member working at the institutions to help students with OSAP, this staff member will be working with the Financial Aid Department.
- Survey on how OSAP is working for your benefit, any improvements to keep track for future.
- Wrap around services (i.e. PSSSP, OSAP, Housing, Social Services, etc.) work together to ensure complete cohesive report.
- We need a First Nations specific brochure that explains OSAP to First Nation students and how it interacts with the other services that are available to them.

Question #3

The final question put to participants sought their input on the eligibility requirements for OSAP, specifically whether participants could identify any issues with these requirements.

A Canadian citizen, permanent resident or protected person

- Declaration of Canadian citizenship is not going to work, not all students identify as being a Canadian citizen.
- Can someone hold dual citizenship and be eligible for OSAP?

An Ontario resident

- There are a number of communities that cross provincial and even national boundaries. These communities do not recognize this arbitrary invisible line. Community members can live on one side of the provincial boundary, but work and attend school on the other as the communities are not set up on the basis of arbitrary boundaries.
- Some Treaty 3 communities straddle borders, are Ontario residents but hold Manitoba health cards. What would they be classified as?
- If you've been on a Rotary exchange for 12 month exchange in high school, can they apply for next year due to residency requirement?

Attending an OSAP-approved program and school and enrolled full-time in a certificate, degree or diploma program

- At the Anishinabek Educational Institute (AEI), they have Pre-Health Sciences, Early Child Education, Personal Support Worker, and First Nations Welfare advocate programs that are not seen as “full time”, even though they are. Students attend one weekend a month, and every Wednesday for a year. This program is considered full time at AEI because of the amount of face to face time students receive. Why wouldn't OSAP approve these courses for funding? They are full time, as the Ministry has guidelines they make AEI fulfill. Under MAESD guidelines, these programs are full time. This is really important, because lack of funding is one of the main reasons why students leave the programs.
- The trades and bridging programs are so important and necessary for students to be successful; these services need to be funded as well. Some students may leave school when they are 16 and when they are 22 realize they need academic upgrading. Sometimes they need the extra courses to prepare them for university or college. It doesn't make sense that you can take a year of this or a year of that on OSAP, but these bridging programs are not covered.
- Questions around exactly how institutions and programs are designated as being OSAP eligible?
- Full time course load definition for institutions and OSAP are different. For PSSSP you have two years to complete the program, but OSAP definition allows them to

be full time with lower course load. You can apply for another year under special conditions – but schools are putting them on three year plan.

- Is there any way for OSAP to cross reference and recognize the same programs for students to be funded as Indigenous and Northern Affairs Canada?
- There should be more funding for Ontario resident students who wish to attend schools out of province (i.e. students who attend high cost programs in the United States).
- Mature students can't always attend on campus full-time because of responsibilities to family. How does OSAP view on-line with campus blend/or on-line full-time status?

Self-Identification Requirements

- Some students do not want to self-identify or be associated with the government due to the history of colonization.
- Some felt documentation should be required for those who self-identify but there were different opinions on what this documentation should be or who should verify these declarations:
 - Proof of documentation can include a photocopy of the student's status card.
 - Some students may be hesitant to provide a copy of their status cards due to privacy of information and data sharing. It was suggested that education counsellors and guidance counsellors communicate the OSAP processes and information to students in order to help them understand why they need to provide proof of documentation.
 - Documentation should be required as it is very important to protect the benefits that are provided to Indigenous people from fraud.
 - Use the nominal role, Treaty/Status numbers.
 - Should be a listing of what type of documentation OSAP would accept.
 - First Nations should be able to verify their members.
 - Communities might want to work with OSAP to help identify students.
- Documentation issues were also identified for non-status students. Suggestion of a letter from their First Nation to confirm membership, however some noted that there may also be non-status students without a community. Some noted concerns with communities having that level of authority to issue such letters. Suggestion that parent's status cards be used as well.
- Some table discussion had no consensus on what form of documentation should be provided, however there were strong feelings that it not be left wide open for

anyone to self-identify. Suggested that perhaps just saying we would require proof of ancestry might be enough to deter fraudulent behaviour.

- Suggestion of having a separate OSAP stream for Indigenous learners. When the student identified as being First Nation any subsequent applications would have application numbers that are prefixed by “IN“, thereby identifying the application as belonging to the Indigenous learners stream. These applications could then have the questions tailored and requirements accordingly (i.e. status card would be proof of status and residency). Additionally “IN“ applications could be filtered through so that the method by which they are processed/reviewed/etc. would ensure that there was a clear OSAP/Education Counsellor relationship to help ensure Education Counsellors have a clear understanding of their students’ funding and how the OSAP/PSSSP processes are working in conjunction with each other.
- Every community may have different perspectives, how can we work with the varied politics?
- The province needs to get on the same page with Indigenous and Northern Affairs Canada’s registered list.
- Postsecondary education is a treaty right.
- Clarify definition of Indigenous as to Canada, "For the purpose of this application, Indigenous means..."
- Terminology on ‘status’ needs to be clarified. One group thought that it does not matter if we ask for status cards or not, thinks that it should be up to OSAP, there may be students who have fake status cards.

PART 4: MOVING FORWARD

The Information Sessions were highly successful in gathering a wealth of information and input on the announced transformation of OSAP. Participants were eager to share their insight and concerns on OSAP in order to ensure applicants are supported as effectively as possible.

Even with the announced changes aimed at transforming OSAP, it is clear that work remains to ensure the transformation is implemented in a manner that effectively supports the educational goals and visions of First Nations students. Based on the input received from the highly successful Information Sessions, it is proposed that the following OSAP specific issues be addressed collaboratively between First Nations and the MAESD.

- 1) ***Ensuring adequate travel support is provided to First Nation students.*** It is quite clear from the input received from participants that supporting the necessary travel expenses of First Nation students remains a significant barrier to these students pursuing a post-secondary education. This barrier can be especially significant for those students having to travel from remote communities to urban centers. The support provided to cover these expenses need to be evaluated with additional supports as identified.
- 2) ***The disbursement schedules for OSAP support needs to be amended to allow for more frequent payments during the year.*** In order to ensure students are properly supported to meet the upfront financial needs associated with potentially relocating and covering initial tuition payments, the timing and schedules for OSAP disbursement needs to be reconsidered. It was proposed that having these payments be disbursed more frequently during the year, as opposed to two lump sums, could also assist those students struggling to manage their finances.
- 3) ***The income verification process in the OSAP application needs to be clarified and consider the unique issues faced by First Nation students.*** It was made quite clear by participants that the current process for verifying income for students and their parents and spouses can be quite cumbersome and difficult to manage due to the tax exemption status income on reserve has and some of the socio-economic issues existent in communities. The requirements and processes used to verify income needs to be examined and clarified so the process no longer poses as a barrier for First Nation students.
- 4) ***First Nation students need to be better informed of the basis in which grants will be converted to loans.*** Participants spoke about students' fears over grants potentially being converted to loans as a barrier for some students. Some of this fear was said to be attributed to a lack of knowledge from some students as to when this could occur. There were also concerns with the repayment conditions applied to loans once they are converted to loans and the barrier this creates to steering students back into the post-secondary stream.
- 5) ***First Nations need to be provided with additional capacity in order to provide the necessary support to students seeking OSAP.*** First Nation students often turn to their community Education Counsellor for assistance with their OSAP application, however it was conveyed that these Counsellors simply do not have the capacity and resources to provide this support. If properly supported, it was suggested that community Education Counsellors could assist students in overcoming some of the basic barriers faced with accessing OSAP. These Counsellors could also be in a position to provide more culturally relevant support services, which was another gap identified in the support First Nation students require.

- 6) ***Self-identification should be accompanied with some type of required support documentation.*** While a majority of participants agreed that some type of supporting documentation should be required for those students self-identifying, no clear direction was provided as to what that documentation should be. Further work is going to be necessary in establishing what this documentation might be.
- 7) ***The process for designating OSAP institutions and their programs as OSAP eligible must be clarified and possibly amended.*** There was clear frustration among participants with respect to how OSAP designates institutions and programs as being OSAP eligible. Participants questioned how bridging programs and programs with unique delivery structures were deemed ineligible for OSAP support despite their importance to facilitating First Nation student success and outcomes.
- 8) **First Nations will need support to facilitate adjustments to post-secondary education policy in order to enable students to access OSAP.** Many First Nations have policies which restrict students from receiving support from OSAP and PSSSP at the same time. Because of limits on PSSSP funds most First Nations currently restrict access to PSSSP funds for some of their members. Policies could work to combine OSAP grants and PSSSP funding to maximize the number of students supported. Appropriate information and support must be provided to ensure each First Nation can adjust policy to fit the unique needs of the community if they so desire.

PART 5: AIC RECOMMENDATIONS

The Aboriginal Institutes (AIs) have identified four (4) features of OSAP that impact AIs and their learners (note: as we continue to engage in discussions with Ontario, we may identify other or additional issues worthy of attention and swift action). These include:

- A. the requirement that a student be enrolled in an ‘approved institution’ for the purposes of receiving OSAP;
- B. how OSAP defines ‘approved programs of study’;
- C. listing of AIs on MAESD website and OSAP aid estimators and applications; and
- D. disbursement of OSAP and Financial Aid Counselling.

A. Approved Institutions for the Purposes of OSAP

Currently, a student attending an AI would be eligible for OSAP if he or she is enrolled in a program that is being offered at an ‘approved institution’ (‘approved institution’ is defined in s. 8 (1) 1 of O. Reg 268/1). In other words, a learner attending an AI would be eligible if the AI delivers the program in conjunction with a mainstream college or University (AIs fall within s. 8 (1)1). An institution can also be considered an ‘approved institution’ for the purposes of OSAP if it is approved for that purpose (see section 8(2) of O. Reg 268/1).

Ontario's 2017/18 budget called for \$56 million in funding for AIs over three years. Ideally, this funding should be matched by equivalent support to learners who attend AIs. **The time is right for Ontario to formally approve student assistance funding for AI learners under section 8 of Regulation 268/01, regardless of whether the program of study is in conjunction with a college or university**, provided the program meets the requirements for approved program of study as amended through discussions mentioned in section B below regarding s. 7.

The approval should apply to both cases (i.e., whether there is a partnership or not).

B. Approved Programs of Study

Section 7 of *Regulation 268/01* under the *Ministry of Training, Colleges and Universities Act* refers to 'approved programs of study'. We would like further clarity on how this section is currently interpreted by Ministry officials with reference to AIs which currently employ various non-standard program delivery models to accommodate the unique needs of Indigenous learners. Such programs meet high standards in terms of quality and hours of instruction, and learners should be supported in their choice to pursue them.

Relating to section 7:

1. The AIC is seeking clarity from the Ministry of Advanced Education and Skills Development (MAESD) about how OSAP covers the following programs:
 - a) vocational training (skilled trades); and
 - b) "pathways," i.e., courses that do not necessarily lead directly to a diploma or a degree.
2. The AIs are interested in exploring changes to either the interpretation or the letter of s. 7(1)(b) of the Regulation (which provides that a **program of study is between 12 and 52 weeks**), so that it allows for an alternative formulation based, for example, on the number of hours of instruction. More broadly, other changes to section 7 may be necessary to begin facilitating OSAP support for learners attending AIs. Modification to the applicable requirements under this section is an 'easy win' that would contribute to increased access to Indigenous education.
3. AIs are recommending that OSAP fund a broader range of programming to meet the specific needs of Indigenous learners, in particular **upgrading to the Ontario Secondary School Diploma (OSSD) and equivalents and pathways**.

C. Listing of AIs on MAESD website OSAP Aid Estimators and Applications

AIC requests that MAESD begin listing AIs as an option for learners who are consulting MAESD aid estimators and applications online.

D. Disbursement of OSAP and Financial Aid Counselling

For learners attending mainstream institutions, OSAP is disbursed directly to the institution for tuition, and the remainder is disbursed in lump sums twice a year, directly to the student, for living expenses. This mainstream method of OSAP disbursement is less than ideal for Indigenous learners.

Experience has shown that AI learners prefer to have an intermediary who can provide financial counselling, and who can disburse student assistance funding in stages, i.e., more often than twice per year (e.g., Six Nations Polytechnic, has had success with this model) It would be helpful to discuss how this service might be provided to all AI learners.

The AIC also wishes to begin discussions with Ontario regarding how to provide AI learners with access to OSAP counselling and assistance in the event of unexpected incidents, such as illness, disability or change in personal or family income.

PART 6: ONECA Recommendations

ONECA has identified a number of concerns that need to be addressed if we want to provide the best possible opportunities for First Nation students to succeed and for a well coordinated process that respects the rights of our First Nation Learners.

These are three top issues that will immediately impact Counsellors who are administering the PSSSP and supporting those students who choose to apply to OSAP. We will identify other issues as they arise.

1. The guidelines and approval processes that already exist in First Nations only take into consideration PSSSP.
2. Counsellors at the First Nation will be expected to support students who wish to apply for OSAP, however they may not have the capacity to do so given the limited resources, and training within their communities.
3. If changes are made to the OSAP program in the future how will our communities be engaged and involved in the process? How will the changes filter down and be communicated to counsellors at the community level ?

Recommendations

1. For those communities who choose to encourage their students to apply for both PSSSP and OSAP there needs to be resources available to them to support the review and development of guidelines and any changes they need to make to accommodate the introduction of the OSAP application.
2. There needs to be on-going training sessions set up for Counsellors so that they gain the knowledge and understanding to support students who are applying for OSAP.
 - a) Financial Aid offices also need to be trained on the changes and how to handle First Nation applications. They need to be aware of the \$3000.00 exemption and sponsorship.
3. Communication and dialogue need to continue because both parties have a different view when it comes to funding Education. OSAP program is a needs based program where as First Nations understand that funding for post-secondary education is an Aboriginal and Treaty right arising from treaties and federal fiduciary obligation. From demonstrations to lobbying to court cases,² First Nations have taken action to assert this right. While the dialaogue must continue we need to put measures in place to ensure that information is reaching the people who actually administer the programs at the community level.

² See, for example, *Greyeyes v. The Queen*, [1978] 2 F.C. 385, *Attorney General of Canada v. Marvin Norman Yellowbird* [2008], ACQB, unreported