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## **COVID-19 UPDATES FROM IRCC**

**May 27, 2020**

*The following represents a summary of policy and procedure updates provided by IRCC related to the COVID-19 pandemic. These updates were collected by way of a coordinated effort from Colleges and Institutes Canada, Universities Canada, and the Canadian Bureau for International Education.*

*We encourage you to also monitor the Government of Canada publications regarding COVID-19, and program delivery updates, which are being reviewed and updated on a regular basis:*

<https://www.canada.ca/en/immigration-refugees-citizenship/services/coronavirus-covid19.html>

<https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/updates.html>

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### **New, Renewals and Extension Applications– Temporary considerations of requirements due to COVID**

**Question:** 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.

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

**Question:** 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 application, but has not yet received a decision regarding the CAQ, will their applications be processed before a decision has been rendered?

**Response:** 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 by IRCC. 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.

There is no fee waiver for any temporary residence applications or extensions.

Foreign nationals who are in Canada and whose temporary resident status may soon expire may apply for an extension in order to maintain their temporary resident status in Canada. As per current guidelines, applicants must apply online and must meet all requirements, including biometrics and fees, as applicable.

Foreign nationals who have an extension application currently in progress will benefit from implied status and may remain in Canada until a decision is rendered on their application; therefore, expedited processing is not required.

<https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/service-delivery/coronavirus/temporary-residence.html>

**Question:** 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?

**Response:** 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>

**Question:** Though not always required, in some cases submitting a language test result is strongly recommended with a study permit application. Which language tests are currently accepted through the regular stream in India and elsewhere?

**Response:** Depending on their country of residence/where they submit their application; prospective students may be requested to submit additional documentation or information to support their study permit application, such as language test results. Since such requests are specific to the country where the applicant is submitting their application, applicants should refer to the country specific study permit document checklists for information on acceptable language test results.

**Question:** Would IRCC accept of virtual notarization of custodianship documents that need to accompany new study permit applications overseas or renewals from within Canada?

**Response:** At this time IRCC cannot accept virtual notarization of custodianship documents. Clients who cannot submit the required custodianship documents may upload a document when

submitting a study permit application, and they can include a supporting letter explaining why they are unable to provide the required documents. During the covid pandemic, applications will not be refused for not having the custodianship documents. Once the client has the required documents, they can submit them, and the application can continue to be processed.

If a minor is in Canada and is applying for an extension, they will benefit from implied status and will continue to be eligible to attend school. Once the client has the required custodianship documents, they can submit them, and the application can continue to be processed.

**Question:** There is a requirement to provide proof of academic standing from institution to renew study permit. In the case of K-12 schools, sharing student transcripts by email is considered a breach of privacy. Would IRCC waive this requirement for k-12 applicants or accept a letter from the registrar?

**Response:** If a student at the k-12 level would like to renew their study permit but they are unable to obtain transcripts, IRCC would require proof of the last grade they successfully completed in primary/secondary education and the year. This information could be submitted from the school registrar and would not require transcripts. If students are applying for post-secondary, IRCC would require confirmation that they graduated High School.

## **New, Renewals and Extension Applications – Processing and timelines**

**Question:** Given ongoing service disruptions and the subsequent backlog of IRCC related applications, what impact will this have on study permit applications?

**Response:** IRCC continues to process study permit applications, but at limited capacity. Prospective students also may be unable to provide all documents required to complete their study permit applications given service interruptions related to COVID-19 (e.g. immigration medical exams, biometrics collection, police certificates). These uncertainties may cause processing delays.

**a.** Can we expect that new study permits will be granted for the May/June intake?

**Response:** IRCC continues to process and finalize complete study permit applications. However, at this time students whose study permit is approved after March 18 will not be able to enter Canada and obtain their study permit at a Port of Entry as they are not exempt from the current travel restrictions related to COVID-19.

**b.** Once business resumes (either partially or fully), how will IRCC address large volumes of new applications and what will the processing time be?

**Response:** IRCC is monitoring the situation and is actively looking at possible options with respect to application processing for prospective students. We look forward to working with the associations and their members to better ascertain the volumes of prospective students to strategically align our resources, which continue to be limited due to ongoing health and travel restrictions.

c. There are concerns about the potential impact of processing times on fall enrollments. Are there measures being put in place to ensure that disruptions to processing for the fall intake will be minimized?

Response: IRCC is monitoring the situation closely and is actively looking at options in order to develop contingency plans should volumes exceed available processing capacity.

Question: Is it possible to allow for an extension to approved visas for short term groups who would like to postpone and travel to a later date? This would avoid the group having to re-apply again with all documentation and pay fees for a 2nd time.

Response: At this time, these students will have to re-apply with all documentation and pay the associated fees. If there are any changes to this guidance, it will be posted on our external website.

### **Approved SP holders (not yet in Canada) - Deferrals**

Question: Will students who have their May acceptance deferred to September need a new Letter of Acceptance or will a letter from their institution indicating their acceptance is deferred be sufficient?

Response: IRCC is developing guidelines for applicants **outside Canada** whose enrollment has been deferred to September.

If the study permit holder is **in Canada** at the time of deferral, and they wish to remain in Canada, they must begin their studies the following semester or within 150 days from the date the deferred enrollment is confirmed, whichever comes first. Otherwise, they should do either of the following:

- change their status (that is, change to visitor status or worker status)
- leave Canada

Students are responsible for informing themselves on the status of their program of study (i.e. whether it is ongoing, cancelled or differed). Should an officer have concerns, they may request additional supporting documents. Student whose programs are cancelled can change their program of study within the 150 days of the issuance of their study permit. Students who no longer wish to study in Canada may also withdraw their application.

### **Starting Online from Abroad - Temporary considerations of requirements due to COVID**

Question: Will IRCC consider extending the May/June policy exemptions to allow students to start studying online from abroad in Fall and retain PGWP eligibility? If May/June provisions are extended to fall semester, will study permits be processed before then?

Response: The Post-Graduation Work Permit Program (PGWPP) eligibility will not be affected for international students who have/have been approved for a study permit who begin spring, summer or fall 2020 courses online due to travel restrictions related to COVID-19. Students in this situation may begin their classes while outside Canada and complete up to 50% of their program via distance learning. In addition, they will not have time deducted from the length of a future post-graduation work permit for studies completed outside of Canada, up to December 31, 2020.

IRCC continues to process study permit applications, but at limited capacity. Prospective students also may be unable to provide all documents required to complete their study permit applications given service interruptions related to COVID-19 (e.g. immigration medical exams, biometrics collection, police certificates). These uncertainties make it challenging to predict at present what processing times will be for students intending to start a program in the fall.

Question: 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?

Question: 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?

Response: 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.

Question: Must students who begin programs online study full-time in order to maintain PGWP eligibility? In some cases, studying part-time over a longer period would allow for a larger proportion of the program being completed in Canada.

Response: For the spring-summer semesters, students who begin programs online should study full time unless the DLI is unable to offer a full time course load at this time. Additional documentation may be requested by the processing agent to confirm whether the student.

Question: 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?

Response: 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.

Question: 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)?

Response: 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.

## **Starting Online from Abroad – Distance working considerations**

Question: 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?

Response: 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.

Question: How can institutions legally employ international students who are located outside of Canada in COVID-19 context (ex. Remote TAs)? For students who hold a study or work permit and a valid SIN, nothing further is needed from IRCC or ESDC. However, this is a time to consider extraordinary facilitation for those who have been approved for an initial study or work permit but have not entered Canada to obtain their permit, those who applied to extend their study or work permit prior to expiry and are now beyond the expiry date and waiting for approval of their application, and potentially even those who applied for a complete initial study permit in a timely manner but are waiting for the application to be processed.

Response: *The Immigration and Refugee Protection Act (IRPA)* and its provisions do not apply to work situations outside the country; as such, even though the work being performed may meet the definition of work, it is irrelevant as *IRPA* does not apply to work being performed outside Canadian borders.

## **Students and Workers (outside of Canada) - Travel exemptions**

Question: 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?

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

Question: It is indicated in the new PDIs that eTAs or TRVs will only be issued to "foreign nationals who can demonstrate that they need to travel to Canada urgently." Would this include study permit holders who need to return to continue their studies (i.e. once classes resume, would the need to resume studies in Canada be considered urgent)?

Response: The following foreign nationals who are currently outside Canada are exempt from Canada's travel restrictions and can travel to Canada if they are travelling for non-optional or non-discretionary purpose:

- Foreign nationals who hold a valid Canadian study permit as defined in section 2 of the *Immigration and Refugee Protection Regulations*.
- Foreign nationals who received a letter of introduction from IRCC dated on or before March 18, 2020.
  - Document to present to the air carrier: a paper copy or e-version of the letter of introduction dated on or before March 18, 2020.

Like all travellers, including Canadian citizens and permanent residents, international students who enter Canada will undergo the necessary health checks and must quarantine for 14 days upon arrival in Canada.

Question: Would a new graduate with an implied status on a PGWP and an offer letter to work in Canada be allowed to enter the country, assuming he or she is able to get to the border?

Response: No. If their study permit is no longer valid, they would need to have a letter of introduction or their actual work permit to be exempt from the travel restrictions.

Question: 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.

Response: 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.

Question: IRCC requires custodianship for minor students (18 years of younger for most cases) coming to Canada. For those that stay in the residence, 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 our institution to unforeseeable risks. Can IRCC clarify the risks we (both the staff member and the institution) are assuming by signing as the custodian?

Response: Through the custodianship arrangement, IRCC can be satisfied that appropriate care and support is in place for the minor child studying in Canada. It is the responsibility of the parents/guardians and the custodians to consider the risks prior to making a decision to assume the role of the custodian. Taking on the responsibility for the minor during COVID-19 would mean that the custodian is accountable for providing adequate care and support of minor while in Canada. Any direct impact on specific custodianship obligations would be left for the staff/institution, as custodian, and a student's parents/guardians to assess.



**Question:** Will there be an expansion of the classification for essential travel for study in Canada to cover new study permits (after March 18)?

**Response:** IRCC is monitoring the evolution of the travel restrictions and working closely with CBSA colleagues. We will keep stakeholders apprised on the developments as they emerge. IRCC acknowledges that study permit holders or applicants having been approved for a study permit may be unable to travel to Canada and have to start or continue their program through distance learning abroad while their initial intent was to come to Canada. Applicants who have been approved for a study permit to begin a program in the spring, summer of fall 2020 semester, and who will begin their program online from their home country instead of trying to travel to Canada at this time will remain eligible for a PGWP. The duration of time spent in distance learning abroad will not be excluded from the time accumulated toward the length of the PGWP until December 31<sup>st</sup>, 2020.

**Question:** How far in advance to the program start date will CBSA let students arrive, (taking into consideration 14 day self-isolation and additional issues related to the situation)?

**Response:** There is currently no specific guidance on how early students can arrive prior to their studies. IRCC is monitoring the evolution of the travel restrictions and working closely with CBSA colleagues. We will keep stakeholders apprised on the developments as they emerge.

## **Parent/Guardian of a Minor - Travel & Permit Exemptions**

**Question:** Can you please comment on the potential travel exceptions for natural parent/guardians of a minor in Canada with a valid study permit?

**Response:** A. Foreign Nationals reuniting with an immediate family member who lives in Canada but is not a Canadian citizen or permanent resident are exempt from the travel restrictions. They do, however, need to obtain authorization from IRCC to serve as evidence that they meet this exemption to be able to board a flight. To do so, they need to submit a request to IRCC at: IRCC.COVID-TravelExemptions-Exemptionsdevoyage-COVID.IRCC@cic.gc.ca. In addition to this authorization, these foreign nationals need to hold either a valid temporary resident visa or electronic travel authorization (eTA).

If they do not already have a visa or an eTA, they will need to apply for one. More information can be found in the link below:

[https://www.canada.ca/en/immigration-refugees-citizenship/services/coronavirus-covid19/travel-restrictions-exemptions.html#family\\_member](https://www.canada.ca/en/immigration-refugees-citizenship/services/coronavirus-covid19/travel-restrictions-exemptions.html#family_member)

**Question:** Visa Extension for Accompanying Parent of Minor International Students

It is our understanding that students holding valid study permits issued prior to March 18th will be able to re-enter Canada after summer break in order to continue with their studies. However, many elementary-age international students are accompanied by/live with a natural parent (often) mom who typically has a visitor visa. If the parent leaves the country and there isn't a change to border closures, will they also be able to return if accompanying their child who is a

minor with a Study Permit?

Response: For foreign nationals travelling from any other country than the US to be eligible under the family reunification exemption:

- they must self-identify and obtain written authorization from IRCC at IRCC.COVID-TravelExemptions-Exemptionsdevoyage-COVID.IRCC@cic.gc.ca
- there must be two or more foreign nationals who are immediate family members of each other, and the officer authorizing one or more of them to travel to Canada to allow them to be reunited

As such, whether the minor child and parent are travelling together to Canada for non-discretionary purposes or whether the minor child is already in Canada and the parent is travelling to reunite with the minor child, both are covered under this exemption.

Foreign nationals travelling from the US do not require written authorization, but they must also demonstrate they are travelling for a non-discretionary purpose, which includes, among others: showing appropriate documentation to enter Canada to work, study or land as a permanent resident, and entering Canada for the purposes of taking up full-time residence in Canada (this applies to prospective permanent residents as well as temporary residents who are seeking entry to Canada to live with immediate family members).

More information can be found in the link below:

[https://www.canada.ca/en/immigration-refugees-citizenship/services/coronavirus-covid19/travel-restrictions-exemptions.html#family\\_member](https://www.canada.ca/en/immigration-refugees-citizenship/services/coronavirus-covid19/travel-restrictions-exemptions.html#family_member)

### **Approved SP holders (currently in Canada) – Working & Coop**

Question: Can you advise on the ability to work for students who are on a coop period but have not received an approved work authorization permit (due to longer processing wait lines)? Can these students start their work period? How many hours can they work?

Response: As a facilitation measure, study permit holders may use the off-campus work authorization for co-op if the work is less than 20 hour/week while waiting for their co-op application. If the co-op application is refused, they must stop working immediately.

Question: Can students in suspended programs work full time during this summer, i.e. considering the suspended semester a scheduled break?

Response: IRCC does not consider a suspended semester as a regularly scheduled break. However, international students who have been forced to take a break in their studies due to COVID-19 can continue to work on or off-campus. They are still subject to the authorized number of hours they would have been permitted to work as a full-time student. In other words, if the summer semester is a regularly scheduled break in their program, the student would be allowed to work full time.

Question: 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)

Question. 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?

Question. 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?

Response: 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.

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.

### **Approved SP holders (currently in Canada) - Timeline exceptions**

Question: 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?

Response: If a student in Canada has to withdraw from coursework completely due to COVID-19, they should either enroll in a new program of study, change their status or leave Canada. For the purpose of assessing if a student is compliant with their study permit conditions (i.e., to remain enrolled in a DLI and actively pursuing their studies), any time taken to transition to a new program, change status or leave Canada should not exceed 150 days from the date the school closed. If the student does not intend to enroll in a new program of study and is unable to leave the country, they must apply for a visitor record or a work permit, if they are eligible to apply from within Canada.

Question: 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?

Response: At present, there are no measures in place to exempt students from having to submit an application and meeting the relevant requirements if they wish to extend their stay in Canada as a student. The applicant should continue to submit the study permit extension applications when they are eligible to do so. Applicants will have implied status while awaiting a decision on their application as long as they applied prior to the expiry of their current study permit.

Question: Can research interns in Canada under the GSS 120 day exemption be allowed to continue their research and receive funding beyond the 120 days (if their unable to return home due to COVID 19)?

Response: Foreign nationals who entered Canada under the GSS public policy are not eligible to apply for a work permit after entry and cannot benefit from the authority to work without work permit under R186(u).

Section R201 of *the Immigration and Refugee Protection Regulations* allows a foreign national to apply for a renewal of their work permit only if the application is made before their work permit expires. Paragraph R186(u) allows a foreign national to continue working under the same conditions in the event that they submitted an application under section R201 and a decision on the renewal of their application has not yet been made.

Foreign workers entering Canada under the 120-day work permit exemption for do not have a work permit, so regulations governing work permit renewals [R201 and R186(u)] do not apply. If they were admitted for 6 months at the port of entry, they can stay as visitors until the end of the period authorized for their stay, but they cannot work past the period allowed by the exemption unless otherwise authorized. Those foreign nationals must submit their initial work permit applications online. They have to maintain their TR status while awaiting a decision on their work permit application.

## **Canadian DLI and reporting**

Question: Will there be considerations or changes made to the DLI compliance reporting process, including extensions to deadlines?

Response: The current Designated Learning Institution compliance reporting period has been extended by 31 days and will end on May 31, 2020.

**Question:** It was noted that institutions should be prepared to provide a letter of support to students whose studies have been interrupted (moved online or forced to withdraw or study part-time) by COVID-19. What information will IRCC require? Can a template be provided?

**Response:** In the context of Post-Graduation Work Permit Program, IRCC plans to introduce a completion letter template that will request information, from DLIs, related to the impact of COVID-19 on graduates' studies.

## **Graduates and PGWP**

**Question:** What is the PGWP impact of students whose online study was more than 50% in Canada but now is less than this because of the partial online winter term and all online spring term?

**Response:** Students who were already studying in Canada and whose programs/courses were moved online due to the travel and health restrictions introduced due to COVID-19 will not be penalized with regard to their PGWPP eligibility, even if their online study in Canada are now greater than 50%.

**Question:** Can students who start their studies online from abroad with an open application but not yet approved study permit, include this time spent studying toward PGWP once their application is approved?

**Response:** No. For applicants currently outside Canada who are scheduled to begin studying in summer, spring and fall but who do not have either a study permit or approval on their study permit application at the time they start their program/course, time spent studying online studies will not count towards their eligibility for a PGWP.

**Question:** Can students who apply for a study permit renewal/extension and complete their program before receiving a response, still be able to apply for a PGWP and start working full time? Or will they be limited to the 20 hours per week?

**Response:** Students who applied for a work permit on implied status (as a student) are not authorized to work while waiting for a decision on their work permit application. In order to be eligible to work while waiting for a decision on their post-graduation work permit application, the student must have a valid study permit at the time of work permit application. Students are still eligible to work off-campus up to 20 hours per week until they receive their written confirmation of program completion (for instance, a transcript or official letter).

**Question:** Due to potential delays in receiving official DLI documentation for some students, would it be possible to extend the deadlines to apply for the PGWP (past the 180 days) for students who are currently in their final semester or who have just graduated?

Response: Due to school closures, many international students may be unable to obtain a letter of completion or final transcripts from their DLI. As a temporary facilitation measure, applicants who apply for a post-graduation work permit may submit an application without their letter of completion or final transcripts. Applicants should submit a letter of explanation, indicating that they are unable to submit the requested document due to school closure. Once these documents become available, applicants should submit the documents using IRCC's webform.

Question: Would there be a consideration of adding another year to Post-Graduate Work Rights to all students graduating this term? Appreciating that long term we still want to retain these talented students in Canada and that they will need work experience in order to qualify for PR streams, it would be great if these students could be given an additional year.

Response: If an individual's post-graduation work permit is expiring, they can apply for any other type of work permit for which they may be eligible. IRCC is continuing to monitor the situation with respect to Post-Graduation Work Permit holders and the impact of COVID-19.

Question: Student is graduating and applies for a PGWP but cannot find employment because of COVID19. The spouse of that graduate must stop working as their new work permit requires the primary work permit holder to have employment. Under these extraordinary circumstances, can the spouse apply to continue to work?

Response: If the graduate holds a valid post-graduation work permit, and the spouse has been issued an open work permit, the spouse may continue to work for as long as their open work permit is valid. The spouse's work permit does not get cancelled or invalidated because the graduate (holding a valid post-graduation work permit) does not have employment. They both still hold valid documents.

## **PR transition**

Question: Given focus on importance of health care professionals, could medical researchers that are applying for PR get more points for being in medical field in this context? Many are over age 45 and don't get full points.

Response: There are no adjustments being considered to the Comprehensive Ranking System or the Express Entry system for applicants who work in the medical field at this time. IRCC is continuing to monitor the situation with respect to the Express Entry system and the impact of COVID-19.

Question: Can there be some flexibility on the wording of letter provided by university guaranteeing a job and more flexibility on what counts as a qualifying job offer? Given financial uncertainty universities are facing in this context, it is hard to provide certainty around duration of job.

Response: The current requirement that a job offer must be valid for one year after the client becomes a permanent resident has not been changed. At this time there are no adjustments being considered to this requirement.

Question: 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?

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