

July 2, 2015  
09:25:13

Ministry of Advanced Education  
Verification Statistics System

1

Case Comments

SIN	S.22	School Name	Vancouver College of Art & Design	Status	Active
Last Name	VCAD VISUAL COLLEGE	Year Of Audit	14/15		
First Name	OF ART & DESIGN	Open Date	2014-09-09		

TCUS 2014-09-09 On-site inspection at school located at 500-626 West Pender Street, Van. On-site 8:30am - 4:30pm. Accompanied by Mark Bennett, Compliance Officer.

Visit purpose: to ensure institutions understand and are compliant with with the requirements of the Designation Agreement and StudentAid BC policy and administration manuals. The inspection procedures are based on "Inspection Procedures" draft document (e-mail to unit dated Jan.6/14).

Per July 7, 2014 Ministry letter, school CSL repayment rate is 79.7%; previous year was 66.2%. School was not required to submit an IP.

Note: school is Eminata-owned, and Director DeeJ James was previously with CDI.

Note: see Compliance Inspection Report in the electronic institution working file for the formal report.

Morning default management discussion notes:

-Requested that Admissions Director Joe Barbaro join the morning discussion on default management as he would be able to best speak to the pre-enrolment processes.

-Deej indicated that school has approx. 380 current students. Many are from out of province.

-Per Snapshot data provided by Sharlane prior to the visit, school has a below average unmet need (\$5,063).

-Joe explained that students generally have a fine of credit or parental resources to address unmet need. Joe indicated that school does financial assessments and uses a budget form and questionnaire to gauge student resources; contracts are apparently not signed until student is financially prepared. If a student's financial situation is not realistic, the Director makes the final decision on whether to enrol the student. Since March, a financial planner works with a student until graduation.

Advised school of above average withdrawal rate. They indicated they have been trying to address this:

-School categorizes withdrawals 3 ways 1. mental health 2. academic workload issues 3. financial problems.

-School provides tutors free of cost and extra lab time for students at risk of withdrawal

-School is introducing more breaks to allow family visits

-School has created social clubs to allow networking for students away from home

-New student have an extensive 3 day orientation

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Recommended better upfront counselling on SABC withdrawal criteria and consequences of withdrawal.

-Deej says she personally advises students of SABC with policy up front

-Note: file review indicated school has up-front student obligations and actual SABC policy language, and did have attendance warning letters

-Deej advised school allows students to complete at no cost, if justified. If student withdraws(?) a 2nd time, must be self-funded (not sure under which circumstances this would apply)

-School has some post-grad repayment initiatives planned, such as more student contact.

-school attributes its increase in CSL repayment rates to an 87% employment rate.

General program information:

-School has 4 intake start dates per year.

-Deej confirmed the PED-reported breaks are consistent over the last two years and that the school is closed on stats (one at Easter).

-PED reported breaks are for the whole school, not just per program

Notes - Miscellaneous:

-Majority of students attend at 60-80% program lengths or (R) to an extended length, and 4/10 students paid 1-4 thousand above the standard program costs - ostensibly due to withdrawals/UC's. (School may have a very strict with policy - 4 classes missed and student dismissed - was seen on a file. This may contribute to the above average with rate). The multi-year program, multiple apps, and numerous reassessments made checking program length accuracy and the full-time standard difficult.

-Pre-visit review of website indicates school has a scholarship program - discussed reporting requirements for scholarships with school officials. Pre-visit review of a selection of student files indicated some students have reported scholarships.

TCUS 2014-10-02 Compliance Inspection Report e-mailed to Sharlane and Kevan for review and signature.

TCUS 2014-11-24 Received VCAD edits back from Sharlane last Tuesday. Amendments made, report and cover letter in mail to school today. PDF's copied to the LAN Institutions folder, in the Working Inspection File.

## Reardon, Cora AVED:EX

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**From:** Colleen Taylor <Colleen.Taylor@campus-support.ca>  
**Sent:** Tuesday, May 12, 2015 1:04 PM  
**To:** Cushner, Trina M AVED:EX  
**Subject:** RE: VCAD Inspection Response

Thank you Trina.

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**From:** Cushner, Trina M AVED:EX [mailto:Trina.Cushner@gov.bc.ca]  
**Sent:** Tuesday, May 12, 2015 12:39 PM  
**To:** Colleen Taylor  
**Subject:** RE: VCAD Inspection Response

Hi Colleen,

Purnima confirmed that the work experience (50 hours) occurs separately from the 240 hours of classroom time, and that the "Practicum and Portfolio" course is 48 hours of class instruction.

When you submit your new PED for this program, please report this practicum by making a note in box 22 to the effect that there is a 50 hour required work experience that is taken within the 12 weeks of Term 5, which is in addition to the 240 hours of classroom instruction.

Thanks for your assistance,

Trina Cushner  
Compliance Officer  
Ministry of Advanced Education  
Post-Secondary Audit and Accountability Branch  
PO Box 9870 STN PROV GOVT  
Victoria BC V8W 9T5

Tel: 250-356-5937  
Fax: 250-356-5440

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**From:** Colleen Taylor [mailto:Colleen.Taylor@campus-support.ca]  
**Sent:** Tuesday, May 12, 2015 10:16 AM  
**To:** Cushner, Trina M AVED:EX  
**Subject:** RE: VCAD Inspection Response

Hi Trina,

I've asked Purnima to call you.

Colleen

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**From:** Cushner, Trina M AVED:EX [mailto:Trina.Cushner@gov.bc.ca]  
**Sent:** Tuesday, May 12, 2015 10:06 AM

**To:** Colleen Taylor  
**Subject:** RE: VCAD Inspection Response

Hi Colleen,

On your program outline, the 48 hour Practicum and Portfolio course required for graduation makes up a portion of the 240 hours for Term 5. As per the PED you submitted (Dec.4/14), these 240 hours are taken over 12 weeks, at the established full time standard of 20 instructional hours per week.

If the 48 hours for Practicum and Portfolio are not included in the hours that make up SABC full time status is a portion of the program is being offered at less than the minimum 20 hours/week needed for SABC program eligibility (240 – 48 = 192 hours; 192 hours over 12 weeks = only 16 hrs/week on average)? Or students are being funded for a longer program length than they are eligible for (192 hours at 20 hrs/week = only 9.6 weeks)?

Just need to clarify. If you want to have VCAD staff call me, that might be easier.

Trina Cushner  
Compliance Officer  
Ministry of Advanced Education  
Post-Secondary Audit and Accountability Branch  
PO Box 9870 STN PROV GOVT  
Victoria BC V8W 9T5

Tel: 250-356-5937  
Fax: 250-356-5440

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**From:** Colleen Taylor [<mailto:Colleen.Taylor@campus-support.ca>]  
**Sent:** Tuesday, May 12, 2015 8:41 AM  
**To:** Cushner, Trina M AVED:EX  
**Subject:** RE: VCAD Inspection Response

Good morning Trina,

I consulted with the staff at VCAD and the following is their reply. Would you like me to submit a revised PED for the remainder of the year or submit the revisions for the 2015/2016 year?

We only consider class hours for student loan full time criteria. As per student loan policy full time eligibility is considered only if class room attendance is required. We never counted practicum hours in finance or student loan eligibility.

Colleen

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**From:** Cushner, Trina M AVED:EX [<mailto:Trina.Cushner@gov.bc.ca>]  
**Sent:** Friday, May 08, 2015 1:28 PM  
**To:** Colleen Taylor  
**Subject:** RE: VCAD Inspection Response

Thanks Colleen.

You indicated the students have flexibility in scheduling the work experience around course hours in the last 6 weeks of the 12 week Term 5.

Are the other courses in Term 5 on a fixed schedule?

If the work experience is flexible, what is the full time standard for instructional hours each week that is used by the school when applying StudentAid BC withdrawal criteria? How does this work?

Thanks,  
Trina

**From:** Colleen Taylor [<mailto:Colleen.Taylor@campus-support.ca>]  
**Sent:** Thursday, May 7, 2015 3:51 PM  
**To:** Cushner, Trina M AVED:EX  
**Subject:** RE: VCAD Inspection Response

Good afternoon Trina,

I've attached the Program Outline for your review.

The 50 hour work experience is completed while still at VCAD, during the final term of the program (Term 5). The work experience is arranged during the Practicum and Portfolio course. The work experience is usually completed over the final 6 weeks of the program to allow the students flexibility in scheduling the work experience around their course hours.

If you require additional information, please let me know.

Colleen

**Colleen Taylor**  
**Regional Compliance Manager**

office 604.915.7288 x2251 | fax 604.915.7290  
VoIP 110 2251  
email [colleen.taylor@campus-support.ca](mailto:colleen.taylor@campus-support.ca)



Commerce Place | 1800-400 Burrard St. | Vancouver, BC | V6C 3A6

**From:** Cushner, Trina M AVED:EX [<mailto:Trina.Cushner@gov.bc.ca>]  
**Sent:** Thursday, May 07, 2015 12:34 PM  
**To:** Colleen Taylor  
**Subject:** VCAD Inspection Response

Hello Colleen,

Thank you for your inspection response dated December 18, 2014. I just wanted to follow up with some information you provided in response to item 12 (1)(b) of the report. The school was asked to provide some information about the

required practicum component for the PB17 Marketing and Merchandising for Fashion Diploma program. Prior to the inspection, this funded practicum had not been declared to StudentAid BC on the Program Eligibility Declaration.

You have indicated the following:

"The work experience is 50 hours completed while still at VCAD. On occasion, the internship has been completed prior to the portfolio class if the student had the necessary prerequisites to take the job. This is usually done when students are less than a full course load".

Please clarify by providing an outline of the program schedule. At which week in the program is the 48 hour practicum scheduled? Does it normally take place after the regular class component of the program? Are these 48 practicum hours (as reported on the PED) normally taken over 1 week or 2?

When you say that on occasion the work experience is "usually done when students are less than a full course load" – do you mean that on occasion the work experience is taken concurrently with the regular class component?

Thanks,

Trina Cushner  
Compliance Officer  
Ministry of Advanced Education  
Post-Secondary Audit and Accountability Branch  
PO Box 9870 STN PROV GOVT  
Victoria BC V8W 9T5

Tel: 250-356-5937  
Fax: 250-356-5440



November 20, 2014

Our Ref. 98136

Ms. Deej James  
Campus Director  
Visual College of Art and Design of Vancouver  
500 - 626 West Pender St.  
Vancouver BC V6B 1V9

Dear Ms. James:

In follow-up to our on-site visit of July 24, 2014, the attached report details the findings of our compliance review, including recommendations for improvement. The report is based on the sample of files that Ministry Compliance Officers reviewed. Please submit your response to the issues requiring follow-up by December 19, 2014.

As outlined in Chapter 1 of the 2014/2015 StudentAid BC Policy Manual, designated institutions must continuously comply with the requirements specified in the Designation Agreement including adhering to StudentAid BC policies and administrative procedures.

Institutions are selected for compliance review based on an assessment in which the Ministry reviews risk factors (criteria identified in Chapter 1, Section 2 of the StudentAid BC Policy Manual) and materiality (total principal in delinquency) of that risk. Institutions with risk and materiality will have a higher priority when being considered for review; however, institutions with lower materiality may also be selected for review if there is a risk or concern that warrants a compliance visit. Please see the attached Appendix (Designation Monitoring - Criteria for Review) for further details.

Institutions selected for compliance review are chosen based on an assessment of the following factors:

- Portfolio Performance
- Institution Performance
- Student Performance

For further explanation of the factors listed above, please refer to the Designation Monitoring - Criteria for Review document provided below.

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Ministry of  
Advanced Education

Post-Secondary Audit  
and Accountability  
Branch

Mailing Address:  
PO Box 9870 Stn Prov Govt  
Victoria BC V8W 9T5

Location Address:  
5th Floor, 835 Humboldt Street  
Victoria BC V8V 4W8

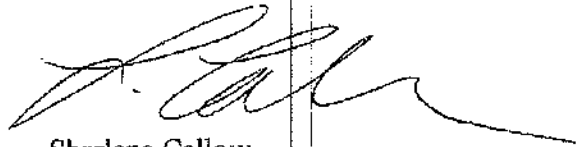
Telephone: (250) 356-1779  
Facsimile: (250) 387-1377

Please note, as a requirement of maintaining designation, institution officials must actively monitor all borrowers receiving StudentAid BC funding and provide assurance with respect to all documents and processes. Failure to follow the procedures outlined in the Designation Agreement, the StudentAid BC Policy Manual and StudentAid BC Administration Manual, or participation in any other actions that jeopardize the integrity of the StudentAid BC program may result in designation not being renewed or other restrictions on the institution.

To access the 2014/2015 StudentAid BC Policy Manual, please visit the StudentAid BC website at <https://studentaidbc.ca/school-officials/index.php>.

Thank you for your cooperation and assistance in conducting this review. If you have any questions or concerns please do not hesitate to contact Sharlane Callow at 250-356-7210 or by e-mail at: [Sharlane.Callow@gov.bc.ca](mailto:Sharlane.Callow@gov.bc.ca)

Sincerely,



Sharlane Callow  
Director, Compliance and Investigations

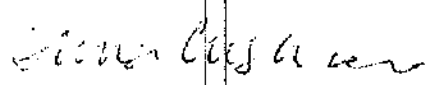
Attachments: Compliance Review Inspection Report – July 24, 2014  
Appendix 1: Designation Monitoring- Criteria for Review



## Designation Monitoring - Criteria for Review

Performance Indicator	Criteria	Description
Portfolio Performance	Repayment Rate (most current available and recent history)	The loan repayment rate of the borrowers who consolidated their loans has not been maintained at an acceptable level.  <i>Note: The institution may have been required to submit a loan improvement plan.</i>
	Loan Principal (delinquent and defaulted)	The institution has a material amount of loan principal in delinquency or default.
Institution Performance	Last On-site inspection	The institution has never had a compliance on-site inspection or has not had an on-site visit recently.
	Newly Designated School	The institution has recently gained designation status.
	Change of Ownership	The institution had a recent change of ownership.
	Designation History	The institution has a history of poor compliance with the Designation Agreement and SABC policies and/or administration procedures which are unresolved.
	Enrolment	The institution has a significant number of borrowers attending an institution.
	Change in Enrolment	The institution experienced a significant increase in enrolment over the previous year/ or years.
Student Performance	Withdrawal Rate (most current available and recent history)	A comparison of the institution's withdrawal rate to the BC average.
	Completion Data	<i>Note: BC private post-secondary institution data not available.</i>
	Employment Data	<i>Note: BC private post-secondary institution data not available.</i>

**StudentAid BC - Compliance Inspection Report**

Institution Code	Institution Name	Date of Compliance On-site	Time
APUL	Visual College of Art and Design	<u>2014/07/24</u> Year Month Day	Start: 8:30 am End: 4:30 pm
<b>Name of Compliance Officer(s):</b>		<b>Signature of Lead Compliance Officer:</b>	
Trina Cushner (Lead) Mark Bennett			
Type of Inspection: <input checked="" type="checkbox"/> Routine Compliance <input type="checkbox"/> Follow-up Visit			
<b>Institution Information</b>			
<u>Address (On-Site Visit)</u>		<u>Contact</u>	
Street: <u>626 West Pender St.</u>		Contact Name: <u>Deej James</u>	
Suite #: <u>500</u>		Contact Title: <u>Campus Director</u>	
City: <u>Victoria</u>		Telephone: <u>(604) 694-0019</u>	
Province: <u>B.C.</u>		Facsimile: <u>(604) 456-2456</u>	
Postal Code: <u>V6B 1V9</u>		Email Address: <u>Deej.James@vcad.ca</u>	
<u>Mailing Address</u>			
Street: <u>Same</u>			
Suite #: _____			
City: _____			
Province: _____			
Postal Code: _____			

<b>PART A</b>	<b>NATURE AND SCOPE OF COMPLIANCE INSPECTION</b>
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- |             |   |
|-------------|---|
| Objectives: | <ul style="list-style-type: none"> <li>This review is intended to ensure administrative compliance with terms and conditions outlined in the StudentAid BC Designation Agreement.</li> </ul>  |
| Scope:      | <ul style="list-style-type: none"> <li>Discussion with institution officials regarding default management and repayment improvement strategies.</li> <li>Review the administration of StudentAid BC funding and records.</li> </ul> |

<b>PART B</b>	<b>FINANCIAL RISK ASSESSMENT</b>
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Indicator	
2013 Repayment rate (CSL) – students who consolidated between Aug. 1, 2011 - July 31, 2012	79.7%
Amount of dollars in delinquency	\$233,829
Amount of dollars funded	\$1,154,203
Number of students funded	104
2012 Repayment rate (CSL) – students who consolidated between Aug. 1, 2010 - July 31, 2011	66.2%
StudentAid BC Withdrawal rate – students who withdrew between Aug. 1, 2012 and July 31, 2013 (as of November 29, 2013)	21%

- |        |   |
|--------|---|
| Notes: | <ul style="list-style-type: none"> <li>The average StudentAid BC withdrawal rate for BC private institutions was 13%.</li> <li>The average 2013 Canada Student Loan repayment rate for BC private institutions was 80.0%</li> </ul> |
|--------|---|

<b>PART C</b>	<b>PURPOSE OF VISIT DISCUSSIONS</b>
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Check-in discussion with Institution Officials to convey purpose of visit.  <b>Institution Representatives Present for Discussion:</b> DeeJ James, Campus Director Joe Barbaro, Admissions Director	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain.
Check-out discussion with Institution Officials to discuss findings.  <b>Institution Representatives Present for Discussion:</b> DeeJ James, Campus Director Edward Jonathan, Regional Vice President	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain.

PART D	DEFAULT MANAGEMENT	
<p><b>1. Does the institution ensure funded students are aware of the policy prior to enrolment?</b></p> <p>The institution refund policy is contained in the enrolment contracts signed by the student.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other	
<p><b>2. Has the institution implemented the strategies outlined in its Improvement Plan?</b></p> <p>The institution has not been required to submit an Improvement Plan.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
<p><b>3. Discussed the following default management practices including student support and budget counselling:</b></p> <p>On-site we discussed strategies that schools can undertake to promote sound up-front (pre-enrolment) planning and decision making by students.</p> <p>A. Because a common cause of program non-completion is a lack of student financial stability, schools should consider the following best practices in the area of financial counselling:</p> <ul style="list-style-type: none"> <li>• Schools should assess whether potential students have a realistic financial plan in place to successfully maintain an extended period of full time studies.</li> <li>• The use of a budget form can help determine whether the student has sufficient resources from all sources to meet the costs associated with their studies.</li> <li>• Normally, student loan applications should be submitted and approved (i.e., a Notification of Assessment has issued) well in advance of the proposed study period start date and prior to contract signing. Students in need should have accurate confirmation of the amount of StudentAid BC financial assistance available to them for planning purposes prior to making the decision to enrol.</li> <li>• As there can be a high correlation between high unmet need (as indicated on the StudentAid BC Notification of Assessment) and the likelihood of withdrawal, students with high unmet need may require extra planning and attention.</li> <li>• Schools should ensure that prospective students clearly understand the school's payment schedule and how much loan funding would be directed to the school (what is owing to the school for fees, and when and how it is to be paid).</li> <li>• Students who do not have adequate resources should be encouraged to postpone studies until such time as it is financially feasible.</li> </ul> <p>Observations:</p> <ul style="list-style-type: none"> <li>• A review of VCAD student enrolment contracts indicated that they are often</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other	

signed by the student in advance of the student receiving loan approval and a Notice of Assessment from StudentAid BC s.22  
s.22

**It is recommended that, where possible, the school revise the admissions process as per best practices above (3<sup>rd</sup> bullet) in order to better support student planning and decision making.**

B. We discussed best practices the school can undertake to reduce withdrawals through attendance management. Schools should enhance pre-enrolment counselling to help ensure:

- Prospective students have a good understanding of StudentAid BC attendance criteria.
- Students can commit to full time attendance for the duration of the study period.
- Students understand the consequences of StudentAid BC withdrawal.

During the study period, schools should closely monitor and provide extra counselling to students at risk of withdrawal.

Observations:

- Visual College of Art and Design has an above-average StudentAid BC withdrawal rate of 21%.
- A significant number of withdrawals in the last two years occurred within the first 2.5 months of the student loan application period.

**It is recommended that the school increase its pre-enrolment counselling as per the best practices above. Early withdrawals suggest students may not be prepared for the attendance requirements. It is noted that the school does appear to have initiatives in place to mitigate withdrawals that may help to improve the rate.**

C. Also discussed was the impact of longer program lengths on student debt levels. Larger debt loads can increase the risk of student default.

Observations:

- The majority of students at Visual College of Art and Design are taking their programs at 60 – 80% of a full course load, increasing program lengths and student debt loads.

**It is recommended that the institution review its policies that impact program lengths, and enhance student counselling about the ramifications of a reduced course load on overall debt.**

Please see the [Repayment Resource Guide Planning for Student Success](#) on the StudentAid BC website under the 'Policy and Procedures' link. This guide has many other suggestions and best practices that schools can undertake to help improve repayment rates at their school.

<b>PART E</b>	<b>FINDINGS: ADMINISTRATIVE COMPLIANCE</b>
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<p>1. Does the Designation Agreement kept at the institution match the copy kept at the ministry? If no, explain.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other
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<p>2. Does the Amending Agreement kept at the institution match the copy kept at the ministry? If no, explain.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other
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<p>3. Are the institution's signing officers recorded on the Schedule C? If no, explain.</p> <ul style="list-style-type: none"> <li>The enrolment contracts for students <u>S 22</u> <u>S.22</u> were signed by school officials who were not reported to StudentAid BC on a Schedule C (school officials Lukuku, Botha, Lee, Rastch).</li> </ul> <p>Please provide an outline of the procedures the school will put into place to ensure that only Schedule C authorized employees are performing the appropriate duties. Please forward a new Schedule C as appropriate.</p> <p><i>See: 2014/15 Designation Agreement Sections 4.03 and 4.06</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other
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<p>4. Is separation between signing officers upheld? If no, explain.</p> <p><i>See: 2014/2015 Designation Agreement Section 4.05</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other
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<p>5. Does the institution's advertising make false or misleading statements, or guarantee that students attending the school will receive financial assistance?</p> <p>The school website does not refer to StudentAid BC assistance (July 2014).</p> <p><i>See: 2014/2015 StudentAid BC Policy Manual, Pg 13, #12.</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Other
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<p>6. Are Appendix 3 study period dates and allowable costs consistent with the Student Enrolment Contract? If no, explain.</p> <ul style="list-style-type: none"> <li>The Appendix 3 study period end date reported by the school for student S. under application <u>S.22</u> did not match the enrolment contract end date (3 days difference); the Appendix 3 study period dates for students <u>S.22</u> <u>S 22</u> did not match the enrolment contract dates (1 day difference).</li> </ul>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Other
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<p>Please provide an outline of the procedures the school will put into place to ensure that Appendix 3 study period dates reported by the school are accurate.</p> <p><i>See: 2012/2013 StudentAid BC Administration Manual Section 4; 2014/2015 Section 4.</i></p>	
<p>7. Does the cumulative total of all funds directed to the school from a student's StudentAid BC disbursements exceed the amount owed to the institution for the approved program costs?</p> <p><i>See: 2012/2013 StudentAid BC Administration Manual Sec 5-42, bullet# 3; StudentAid BC Policy Manual 2013/2014 pg.43 (d)</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Other</p>
<p>8. Are Program Eligibility Document details consistent with the Private Career Training Institutions Agency program information and Appendix 3 details?</p> <ul style="list-style-type: none"> <li>The total program costs charged to students often exceeded the PED and PCTIA approved total program costs (e.g., students s.22 however this appeared to be due to course withdrawals and/or failures that required program length extensions.</li> </ul>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Other</p>
<p>9. Does the attendance record format meet ministry expectations? If no, explain.</p> <ul style="list-style-type: none"> <li>The attendance record format found on the majority of student files prior to June 2014 was insufficient to demonstrate that students met the minimum weekly attendance hours required to maintain funding eligibility throughout an application study period. (See the attendance record on file for student s.22 for example). The number of hours of expected attendance and the number of hours of actual attendance each day were not present on the record; weekly totals and an attendance percentage for all courses taken in a given week were not present.</li> </ul> <p>Note: this lack of data also made it difficult to verify the institution's reported full time standard and Appendix 3 reported program lengths.</p> <p>The Visual College of Art and Design adopted a new attendance record format in June 2014 which provides appropriate hourly attendance data. As per the Attendance Procedures in the 2014/2015 StudentAid BC Administration Manual, the institution's new record format must also demonstrate:</p> <ul style="list-style-type: none"> <li>The weekly totals for expected and required attendance, and a weekly attendance percentage. Schools must monitor and demonstrate student attendance on a weekly basis in order to comply with StudentAid BC withdrawal reporting requirements.</li> <li>School closures/holidays. These should be consistent with those reported on the Program Eligibility Declaration and total break time must be in accordance with StudentAid BC policy. Statutory holidays observed by the schools should also be identified on the attendance record, as the institution's weekly full-time standard is different during a week with a statutory holiday.</li> </ul>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <input type="checkbox"/> Other</p>

<p>Please make the appropriate amendments to the institution's attendance record format.</p> <p><i>See: Attendance Procedures 2012/2013 SABC Administration Manual Sec 5 pg. 39-40; 2014/2015 pg.50-51.</i></p>	
<p>10. Are student withdrawals reported to the ministry as required? If no, explain.</p> <ul style="list-style-type: none"> <li>The attendance record (Genius system) for student S.22 indicates that under Application S.22 the student met StudentAid BC withdrawal criteria as S.22 was not in attendance at the school for S.22 between S.22 the institution has not reported a StudentAid BC withdrawal for this student.</li> </ul> <p>Please review this file and provide a written explanation as to why this withdrawal was not reported to StudentAid BC. Please provide a withdrawal notification to the Student Support Unit of the Ministry of Advanced Education.</p> <p><i>See: Identifying a Student Withdrawal 2013/2014 StudentAid BC Policy Manual pg.117; 2014/2015 pg.118; StudentAid BC Administration Manual pg.53-54.</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Other</p>
<p>11. Is the institution maintaining student records in accordance with Ministry expectations? If no, explain.</p> <p>A. Missing File Documentation:</p> <ul style="list-style-type: none"> <li>Student S.22 additional program costs (per the "Tuition Payment" record provided on-site) above the original enrolment contract signed S.22 This appears to have been due to S.22 S.22 Documentation to verify all the extra costs could not be located on the student file S.22 was specified on a Contract Amendment dated S.22</li> </ul> <p>Please forward copies of contract amendment(s) verifying all the additional program costs for this student.</p> <p>B. Records of Payment:</p> <ul style="list-style-type: none"> <li>The records of payment found on the student file were not adequate to easily demonstrate the total payment made by the student to the institution for the program. The institution provided adequate, detailed summary documents later at our request ("Tuition Payment" screen shot).</li> </ul> <p>In the future, please ensure a single, summary record of payment details is found on the student file for the purposes of the StudentAid BC inspection.</p> <p><i>See: Student File Documentation 2012/2013 SABC Administration Manual Sec 5 pg. 37-38; 2014/2015 pg. 48-49.</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Other</p>



**12. Other Administrative Compliance Issues:**

**1. Program Eligibility Declaration Reporting – Unreported Practicum**

- The PCTIA website indicates a practicum work experience is a component of the PB17 Marketing and Merchandising for Fashion Diploma, and the program outline on the institution's website indicates an industry practicum is a graduation requirement. A review of the file for student S.2 indicates a practicum experience occurred during a funded study period S.22 S.22. However, this program practicum has not been declared to StudentAid BC on current or past Program Eligibility Declarations.

Mandatory practicum components are considered funded instructional hours for the purposes of StudentAid BC, and policy sets out requirements for institutions with respect to reporting practicum, documenting attendance, monitoring, evaluating, allowable length etc.

**A. Please refer to the StudentAid BC requirements regarding practicum components referenced below. Please provide an explanation as to why this practicum has not been reported on current or past Program Eligibility Declarations.**

**B. Eligible practicum components must be declared to StudentAid BC and the institution must have procedures in place to ensure the appropriate administrative requirements are met. Please provide an outline of the procedures the school uses/will use to ensure this. Please note that if this mandatory practicum is not StudentAid BC eligible, the program itself may not be eligible.**

*See: Program Eligibility, 2014/2015 StudentAid BC Policy Manual pg.17-20; 2014/2015 StudentAid BC Administration Manual pg.14-15, 19-20 (#14-18); 24; 48-49.*

**2. Institution Use of Student StudentAid BC User ID**

- Documentation found on the student file for student S.22 (correspondence to student from institution official Vivian Hsing dated S.22 advises the student to provide the official with S.22 StudentAid BC user ID and password.

Institution officials must not access student information from the StudentAid BC website using a student's user ID and password under any circumstances, even if requested by the student. Current policy states: "Students must not share their StudentAid BC User ID and password with anyone, including their parents, spouse, financial assistance officers and school officials. This is to protect the privacy of students' personal information."

*See: 2014/2015 StudentAid BC Policy Manual pg.4.*

<p><b>3. Early Confirmation of Enrolment</b></p> <ul style="list-style-type: none"> <li>A review of StudentAid BC records indicates that VCAD institution officials often electronically confirm enrolment in advance of the funding disbursement date. For example, the school confirmed enrolment early for students S 22 S.22</li> </ul> <p>Students at hours-based schools can meet StudentAid BC withdrawal criteria in as little as two weeks through unexpected absence, or immediately through dismissal or student choice. Students who meet withdrawal criteria are not eligible to receive subsequent disbursements under a given application. (The release of funds triggered by the school's enrolment confirmation puts a withdrawn student into an overaward of those funds).</p> <p>For these reasons, hours-based schools should wait until the disbursement date to verify that the student has met the StudentAid BC standard for full-time attendance and to authorize the release of funds; only on this date can the school ensure the student is eligible for the disbursement. Schools themselves may not access funds that students are not eligible to receive, regardless of the terms of the enrolment contract. As well, the school should not confirm enrolment prior to the study period start date.</p> <p>In the future, please ensure the school waits until the funding disbursement date to verify attendance/start dates and confirm enrolment.</p>	
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<b>PART F</b>	<b>CLOSING THE COMPLIANCE INSPECTION</b>
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<p>The institution has been advised that they will receive a formal Compliance Inspection Report.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Other
<p>Additional notes on discussions and observations:</p>	

<b>PART G</b>	<b>SUMMARY OF FINDINGS</b>
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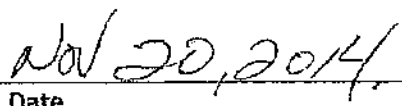
<b>EXAMPLES OF BEST PRACTICES NOTED:</b>	
	<b>Description</b>
	Students at Visual College of Art and Design had a below average level of StudentAid BC unmet need in the 2012/2013 program year, which may be due to the institution's financial counselling.
<b>RECOMMENDATIONS FOR IMPROVEMENT:</b>	
	<b>Description</b> A summary of the recommendations highlighted in bold text in Part D:
1	<b>3 (a) It is recommended that, where possible, the school revise the admissions process as per best</b>

	practices listed in order to better support student planning and decision making.
2	3 (b) It is recommended that the school increase its pre-enrolment counselling as per the best practices listed. Early withdrawals suggest students may not be prepared for the attendance requirements. It is noted that the school does appear to have initiatives in place to mitigate withdrawals that may help to improve the rate.
3	3(c) It is recommended that the institution review its policies that impact program lengths, and enhance student counselling about the ramifications of a reduced course load on overall debt.

**ACTION REQUIRED:**

#	Description A summary of the action items highlighted in red text in Part E. Please respond to each one and ensure the section and item # are referenced:	Due Date
	3) Please provide an outline of the procedures the school will put into place to ensure that only Schedule C authorized employees are performing the appropriate duties. Please forward a new Schedule C as appropriate.	December 19, 2014
	6) Please provide an outline of the procedures the school will put into place to ensure that Appendix 3 study period dates reported by the school are accurate.	December 19, 2014
	9) Please make the appropriate amendments to the institution's attendance record format.	December 19, 2014
	10) Please review this file and provide a written explanation as to why this withdrawal was not reported to StudentAid BC. Please provide a withdrawal notification to the Student Support Unit of the Ministry of Advanced Education.	December 19, 2014
	11 (a) Please forward copies of contract amendment(s) verifying all the additional program costs for this student.	December 19, 2014
	11 (b) In the future, please ensure a single, summary record of payment details is found on the student file for the purposes of the StudentAid BC inspection.	December 19, 2014
	12 (1a) Please refer to the StudentAid BC requirements regarding practicum components referenced below. Please provide an explanation as to why this practicum has not been reported on current or past Program Eligibility Declarations.	December 19, 2014
	12 (1b) Eligible practicum components must be declared to StudentAid BC and the institution must have procedures in place to ensure the appropriate administrative requirements are met. Please provide an outline of the procedures the school uses/will use to ensure this. Please note that if this mandatory practicum is not StudentAid BC eligible, the program itself may not be eligible.	December 19, 2014
	12 (3) In the future, please ensure the school waits until the funding disbursement date to verify attendance/start dates and confirm enrolment.	December 19, 2014

<b>PART H</b>	<b>REPORT SIGN OFF</b>
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Reviewed by:	
	
Signature (Director, Compliance and Inspections)	Date

Visual College of Art and Design APUL  
Schedule C Signing Authorities History

2012 Designation Agreement:

**4.03 Enrolment Signing Officers**

- Registering the student and completing the enrolment contract with the student
- Completing the Appendix 3

**4.04 Eligibility Signing Officers**

- Confirming student enrollment and attendance
- Signing Confirmation of Enrolment forms
- Accepting and Documenting tuition payments to the Institution

**Effective May 22, 2014 (2014/2015 DA submission date):**

*Enrolment Officers (contracts and appendix 3s):*

David Su, Student Financial Planner  
Denis Zhelenkov, Student Financial Planner

*Eligibility Officers (confirm enrolment/attendance, COE's, accepting and documenting \$):*

Purnima Parekh, Financial Administrator  
Deej James, Campus Director

**Effective May 7, 2012:**

*Enrolment Officers (contracts and appendix 3s):*

Caroline Ogawa, Financial Planner (SFP)  
Purnima Parekh, Financial Planner/Administrator

*Eligibility Officers (confirm attendance, COE's, accepting and documenting \$):*

Imran Moloo, Financial Administrator  
Anne Morris, Campus Director

**Cushner, Trina M AVED:EX**

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**From:** Colthorpe, Glenn AVED:EX  
**Sent:** Monday, July 21, 2014 4:44 PM  
**To:** Cushner, Trina M AVED:EX  
**Subject:** RE: VCAD Visual College of Art and Design - APUL

Hi, according to my records, the following staff have or have had SFAS access:

Visual College of Art and Design	APUL	ECE <sup>s.22</sup>
Visual College of Art and Design	APUL	ECE
Visual College of Art and Design	APUL	ECE
Visual College of Art and Design	APUL	ECE
-Delete User		
Visual College of Art and Design	APUL	ECE
Delete User		
Visual College of Art and Design	APUL	ECE

Does this assist?  
Thank you.

Glenn

**Glenn Colthorpe**  
Operational Policy and Program Management Unit  
Student Services Branch, Ministry of Advanced Education  
PO Box 9173 Stn Prov Govt | Victoria BC V8W 9H7  
(250) 387-7444 [Glenn.Colthorpe@gov.bc.ca](mailto:Glenn.Colthorpe@gov.bc.ca)

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**From:** Cushner, Trina M AVED:EX  
**Sent:** Monday, July 21, 2014 4:42 PM  
**To:** Colthorpe, Glenn AVED:EX  
**Subject:** VCAD Visual College of Art and Design - APUL

Hi Glen,

I'm visiting this school on Thurs and am wondering if you can tell me who the ILA and COE administrators are? We don't have a record for them.

Thanks,

Trina Cushner  
Compliance Officer  
Post-Secondary Audit and Accountability Branch  
Ministry of Advanced Education  
PO Box 9173 Stn Prov Govt  
Victoria BC V8W 9H7

Phone: 250-356-5937



July 18, 2014

Deej James  
Campus Director  
Visual College of Art and Design of Vancouver - APUL  
500 - 626 West Pender Street  
Vancouver BC V6B 1V9

Dear Ms. James:

Visual College of Art and Design of Vancouver is currently designated to make StudentAid BC funding available to eligible students enrolled in approved programs, in accordance with its Designation Agreement with the Ministry.

Administration of StudentAid BC funding requires that designated institutions adhere to the requirements of the Designation Agreement and StudentAid BC policy and administration manuals. To ensure institutions understand and are compliant with these requirements, Ministry Compliance Officers will be conducting an on-site inspection.

Section 5.00 of your Designation Agreement states that, for the purpose of an inspection, you will allow Ministry officials to attend the premises of your institution and cooperate fully with Compliance Officers in the conduct of their duties under the Agreement.

This letter is to inform you that Compliance Officers, Trina Cushner and Mark Bennett will be visiting your institution on Thursday, July 24, 2014 at 8:30am. Please ensure that the following is available at that time:

- 1) Upon arrival we will provide you with a list of the student and school files we will be reviewing on-site. Please ensure there are institution resources available to pull and or copy the required records. Please refer to pages 48 and 49 of the StudentAid BC Administration Manual (located on the StudentAid BC website) for a list of the records that must be available for review. Please ensure records (i.e. ongoing attendance and payment information) are up to date, even for students who are currently in studies.
- 2) Time with you in the morning to take a tour of the school and to discuss Ministry expectations with respect to default management and best practices for institutions.

.../2

**Ministry of  
Advanced Education**

Post-Secondary Audit  
and Accountability Branch

Mailing Address:  
PO Box 9870 Stn Prov Govt  
Victoria BC V8W 9T5

Location Address:  
5th Floor, 835 Humboldt Street  
Victoria BC V8V 4W8

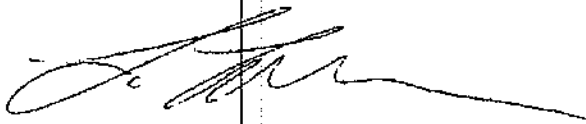
Telephone: (250) 356-1779  
Facsimile: (250) 387-1377

- 3) The institution's copy of the current Designation Agreement, Amending Agreement and Schedule C.
- 4) A quiet room for two Ministry staff to review the files.
- 5) Access to photocopying facilities.

After reviewing the files, the compliance officers will meet with you and any of your staff who have signing authority for StudentAid BC to discuss findings and answer any questions you may have. The visit is expected to conclude at approximately 4:30 p.m.

If you have any questions, please do not hesitate to call me at (250) 356-7210.

Sincerely,



Sharlane Callow  
Director, Compliance and Investigations

Visual College of Art and Design - APUL  
Inspection Date July 24, 2014

Visit purpose:

- Talk about school default management responsibilities
- Review student files and the school's administrative compliance with the Designation Agreement, Policy and Administration Manuals
- Why this school? We try to visit all schools - consider factors such as number of students, trends in enrolment, total amount of loans delinquent/defaulted, never had a visit etc.

Day overview:

- Default management discussion
- A few questions about the school's programs (PED/program/holiday clarification, if applicable)
- File review
- End of day will meet to discuss any findings and school has opportunity to ask questions
- Administrative compliance issues may be: withdrawal reporting and confirming enrolment, attendance records, school deductions from funding, signing authorities etc.
- Formal report out to the school; target is 30 days

Default Management Discussion:

- Under the federal government's Designation Framework, designated schools are expected to share responsibility for default management and for student success. Success definition includes repayment of the student loan.
- Designation Policy Framework can be found on the StudentAid BC website.

"The Framework document itself signals to institutions that student success is a key element in successfully managing financial risk. They play the central role in retaining students, ensuring student success, and ensuring students improve their overall employability. These are key factors contributing to students' success in repaying their student loans. Institutions, therefore, are central to any effort by government to effectively manage the financial risks inherent in a student loan program.")

- Under the Designation Policy Framework, the federal government produces CSL Repayment Rates to assist institutions with understanding the level of financial risk due to defaults at their institution. Letters to VCAD are dated Nov.20, 2013 (2012 rates) and July 7, 2014 (2013 rates).

Repayment Rates:

- Provide FAQ sheet (note: is from 12/13); also, Appendix from previous repayment letter - if needed
- Review repayment rates methodology points if necessary:
  - Rates pertain to the CSLP portion of the loan (60%).
  - Measured every year on July 31<sup>st</sup>.



- Nov. 2013 we sent out the 2012 Repayment Rate letters; July 2014 we sent out the 2013 rates.
  - The 2013 rates are the repayment status of student who consolidated loans Aug. 1, 2011 – July 31, 2012, measured one year later on July 31, 2013.
  - If there are less than 10 borrowers in a 1 yr cohort, then a 3 yr cohort is used
  - Repayment means they are making regular payments or have paid in full.
  - CSLP uses red, yellow, green zones to indicate risk. Red zone institutions have repayment rates of less than 66%; yellow zones is 60 – 85.1%.
  - A continued low repayment rate could lead to a designation review.
  - Yellow zone schools are encouraged to implement default management strategies per the Repayment Resource Guide and may be required to submit an Improvement plan.
- No Improvement Plan was requested from VCAD but we do recommend that the school have one in place.

#### Institution Repayment Strategies:

- Repayment Resource Guide on website – school should be familiar with
- We cannot say what strategies will ensure a good repayment rate - school knows best what makes a successful graduate in their particular industry.
- We recommend in particular pre-enrolment (pre-contract signing) strategies that enable sound student planning:

#### 1. Financial Counselling – what does the institution do?

##### Can recommend:

- Research indicates #1 reason for program non-completion is a lack of financial stability. We recommend that school do early financial counselling and should assess whether a potential student has a realistic financial plan in place that will get them through to graduation.
- Use budget forms
- apply well in advance of start date and contract signing so stdt has NOA and confirmation of how much they qualify for (rather than finding out after they already purchased the program by signing the contract).
- have payment schedules established well in advance so student understands how much of the loan will going to the school and can plan accordingly.
- SABC high unmet need – correlation with high SABC withdrawal rates. Available on NOA.

- students who do not have sufficient resources should be encouraged to postpone studies until they have more savings/part time job etc.

## 2. SABC Attendance Counselling – what does the institution do to encourage retention?

- VCAD has an above average SABC withdrawal rate 21% (53 borrowers) for 12/13 program year (BC privates ave. was 13%) – increased focus on this is recommended; high SABC withdrawal rates considered a risk factor.
- School appears to have a significant number of early SABC withdrawals (Note: early in application period; need more SFAS research to determine if these are early in overall program)

Can recommend:

Student who graduate are much more likely to repay.

- Keep accurate and up-to-date attendance records, review often to spot falling attendance and use warning e-mails/phone calls.
- Extra academic attention/counselling for students at risk of withdrawal/failure.
- Better pre-enrolment counselling on SABC attendance criteria – use up-front obligation form that cites actual policy.
- Better pre-enrolment counselling on PCTIA refund policy. (Cite example of S.22 our records indicate S never attended under his last application, school took S.22
- Follow-up with students who must leave the program: provide counselling on consequences of SABC withdrawal; create opportunities for students to come back and complete program.
- When a student meets SABC withdrawal criteria but can continue in program, schools should not have a policy of dismissal. For default management purposes, schools should continue under the terms of their enrolment contract with the student, where possible and especially where all fees have been paid.

## 3. Student Suitability for Program:

- Improve entrance standards

## 4. Program Lengths:

- Majority of students at VCAD taking 60% - 80% course loads – maximum debt levels. How come?
- Less debt = less default risk

Pre-File Review Questions:

- Designation Agreement copy present?
- Signing Authorities:
  - Have been kept current? (No apparent updates aside from DA submissions)
  - Does school know must be updated and changes reported on a new Schedule C?
  - Who accepts and documents tuition payments? How will this be documented on files?
  - Staff who are doing functions electronically (ILA X3's and COE's) must be the Schedule C designated authorities and use only their accounts (two people cannot sign on under one ID).
- Advertising:
  - How do students find out about SABC funding and BC loan reduction program at your school?
- Program Structure:
  - Module by module or concurrent modules?
  - Self-paced (student progress at own pace through a computerized system) or instructor led (all students in an intake finish each module/course requirements at the same time with an instructor, then move on to the next module?)
  - How do students (R) to drop the c/I?
- Schedule, Breaks and Stats:
  - Normal schedule 20 hours Mon-Fri? Per PED, school open weekends for what? Make-up hours or regularly scheduled classes?
  - PED-reported breaks are for the program or are for the whole school?
  - School closed on stats? Which ones?
  - How handle stats? (960 hour X3's are completed for the hours plus 3 weeks of break - 51 weeks) Are the missed hours made up (at school as instructional hours or by student homework – non-instructional)?
  - PED reported breaks are accurate? Any unreported changes since 2012?

COPY

2014/2015



# Designation Agreement

This Agreement dated for reference the 22 day of May, 2014

## DESIGNATION AGREEMENT BETWEEN

Her Majesty the Queen in Right of the Province of British Columbia,  
as represented by the Minister of Advanced Education  
("the Province")

AND

Legal Name of Institution: Vancouver Career College (Burnaby) Inc (The "Institution")  
Visual College of Art and Design (VCAD) Operating Name of Institution

StudentAid BC Institution Code 

A	P	U	L
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(if previously assigned)

Location(s):

500 - 626 W Pender Street  
Institution Address  
Vancouver, BC V6B 1V9  
City / Town

\_\_\_\_\_  
Institution Address  
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City / Town

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City / Town

*see provided on-site - contact [unclear]*

**WHEREAS:**

- A. The Ministry of Advanced Education ("the Ministry") is responsible for the administration of the Canada and British Columbia student financial assistance programs available through StudentAid BC.
- B. Student financial assistance is available only to students enrolled in StudentAid BC eligible programs at designated institutions.
- C. The Ministry designates institutions in accordance with the Pan-Canadian Designation Policy Framework and the StudentAid BC Policy Manual.
- D. The Institution has applied for designation pursuant to the terms of this Designation Agreement.

**NOW THEREFORE** in consideration of the foregoing, the Province and the Institution ("the Parties") agree as follows:

**1.00 Term**

- 1.01 This Agreement comes into force on August 1, 2014 or on such later date as agreed to and executed by the Parties and remains in full force until July 31, 2015 unless it is terminated earlier in accordance with paragraph 1.05.
- 1.02 The Province may amend this Agreement unilaterally at any time.
- 1.03 If the Province amends this Agreement:
- (a) The Institution will be given 30 days from receipt of the proposed Amended Agreement to sign it; and
  - (b) Upon signing by both Parties, the Amended Agreement replaces the Agreement.
- 1.04 If the Institution fails to comply with paragraph 1.03(a):
- (a) The Institution ceases immediately to be a designated institution; and
  - (b) Student loan financial assistance applications for students attending the institution in the new program year will not be processed.
- 1.05 This Agreement is immediately terminated upon any one of the following occurrences:
- (a) The closure of the Institution; and/or
  - (b) The termination of the Institution's designation.

**2.00 Designation**

- 2.01 Provided the institution remains a designated institution, the Province will make student financial assistance available to eligible students enrolled in approved programs at the listed locations in accordance with the terms of this Agreement.
- 2.02 The Private Career Training Institutions Agency or the Minister of Advanced Education must have approved a designated institution's location(s) under either the *Private Career Training Institutions Act* or the *Degree Authorization Act*, as applicable, and the programs offered by each of these, prior to the Ministry approving these locations and making funding available to eligible students.
- 2.03 The Institution will administer the financial assistance in respect of its students in accordance with the terms of this Agreement.

**3.00 Maintaining Designation**

- 3.01 The Institution will comply with all applicable laws, including, but not limited to the *Canada Student Financial Assistance Act*, the *Private Career Training Institutions Act*, the *Degree Authorization Act*, the *Freedom of Information and Protection of Privacy Act* and the *Personal Information Protection Act* and related regulations.
- 3.02 The Institution will maintain its accreditation under the *Private Career Training Institutions Act* and/or ministerial consent under section 4 of the *Degree Authorization Act*, as applicable.

- 3.03 The Institution will comply with all requirements set out in the StudentAid BC Policy Manual, as amended from time to time, which is available on the StudentAid BC website at: <https://studentaidbc.ca/school-officials> and which forms part of this Agreement.
- 3.04 The Institution will comply with all requirements set out in the StudentAid BC Administrative Manual, as amended from time to time, which is available on the website at: <https://studentaidbc.ca/school-officials> and which forms part of this Agreement.
- 3.05 The Institution must notify the Ministry at least 14 days prior of any substantive change that may affect designation. Substantive changes include, but are not limited to:
- Ownership changes;
  - Change in corporate structure or name of legal entity;
  - Additional campus(es);
  - Changes in campus location;
  - Collaborative arrangements or partnerships with other institutions;
  - Suspensions or action taken by the relevant quality assurance bodies, regulatory college(s) and/or governments.

The institution must request approval from the Ministry if it intends to deliver classes from a location other than the one listed on its Designation Agreement. Approval is not retroactive.

Any changes such as those listed above may impact an institution's eligibility for continued designation.

- 3.06 If the Institution fails to comply with this Agreement, or if the Ministry is otherwise of the opinion that it is necessary for the proper administration of student financial assistance, they may terminate the designation of the Institution or may refuse to provide financial assistance to students registered in some or all of the programs or courses at the Institution.
- 3.07 If the Institution's designation is terminated before the expiry of the Term of this Agreement, the Institution may appeal the decision of the Executive Director responsible to the appropriate Assistant Deputy Minister of the Ministry.

#### **4.00 Administration of Student Financial Assistance**

- 4.01 At the request of the Ministry and subject to all applicable laws, the institution must provide information concerning a student borrower's academic performance, attendance records, student contract, mailing address and phone number to the Ministry.
- 4.02 The Institution must comply with the advertising guidelines set out in the StudentAid BC Policy Manual.
- 4.03 The Institution will designate one or more employees (Enrolment Signing Officers) who will have responsibility for:
- Registering the student and completing the enrolment contract with the student; and
  - Completing the Appendix 3 of the student financial assistance application.

- 4.04 The Institution will designate one or more employees (Eligibility Signing Officers) who will have responsibility for:
- Confirming student enrolment ;
  - Signing Confirmation of Enrolment forms; and
  - Accepting and documenting tuition payments to the Institution.
- 4.05 The functions described in paragraphs 4.03 and 4.04 must be effectively segregated to ensure that no employee is designated under or performs duties under both paragraphs. An exemption may be granted by the Ministry, upon request, if a designated institution had less than 10 student borrowers who received a combined total of under \$50,000 in student financial assistance in the previous program year. The number of borrowers and amount of financial assistance will be determined by the Ministry's official records of the Institution's previous program year.
- Institutions applying for designation for the first time would not be considered for this exemption as no prior program year data would be available.
- 4.06 The institution will provide the Ministry with the names of at least two employees designated under sections 4.03 and 4.04 in the form attached as Schedule "C" to this Agreement.
- 4.07 Immediately prior to the removal of an Enrolment Signing Officer or Eligibility Signing Officer's authority, the institution will notify the Ministry in writing of the name(s) of the person(s) whose signing authority is removed and the date upon which such removal becomes effective.
- 4.08 Immediately prior to the designation of any new Enrolment Signing Officer or new Eligibility Signing Officer, the Institution will provide the Ministry with an updated Schedule "C" form including the name(s) of the new Signing Officer(s).
- 5.00 **Inspection and Compliance**
- 5.01 While this Agreement is in effect and for a period of two years following its termination, the Ministry will have the right to inspect the operations of the Institution, including inspection of individual student borrowers' records maintained by the Institution.
- 5.02 For the purposes of an inspection, the Institution agrees to allow Ministry Compliance Officers to attend at the Institution's premises and agrees to cooperate fully with those Compliance Officers in the conduct of their duties under this Agreement.
- 5.03 A Compliance Officer conducting an inspection may at any time:
- (a) Enter the Institution's premises;
  - (b) Examine a record or any other thing directly or indirectly related to student financial assistance funding;
  - (c) Require that a document or any other thing be produced for inspection;
  - (d) Remove a record or any other thing for review and copying, after providing a receipt;
  - (e) Use the Institution's data storage, information processing or retrieval devices or systems that are normally used in carrying on business in the premises to produce a record in readable form;
  - (f) Question a person; or

(g) Arrange for the conduct of an external forensic audit, at the expense of the Institution.

5.04 For purposes of an inspection, the Institution will make available to the Compliance Officer:

- (a) Copies of all documents requested by the Ministry; and
- (b) Identified staff or personnel of the Institution.

5.05 If, as a result of an inspection, audit or by any other means, the Ministry learns of irregularities or non-compliance with the terms of this Agreement by the Institution, the Ministry may, at its option, take any or all of the following actions:

- (a) Consult with the Institution in person and/or in writing;
- (b) Require compliance within a specific period of time, and require evidence of compliance;
- (c) Require additional or more frequent monitoring or reporting, at the expense of the Institution;
- (d) Replace this Agreement;
- (e) Refuse to provide financial assistance to students registered in some or all of the programs or courses at the Institution;
- (f) Terminate the designation of the Institution; or
- (g) Pursue any other legal remedies available to it.

6.00 General

6.01 Any notice of communication contemplated by this Agreement shall be sufficiently given if:

(a) Sent by email to or by:

- (i) The Ministry at [designat@gov.bc.ca](mailto:designat@gov.bc.ca)
- (ii) The Institution at [courtney.grenville@campus-support.ca](mailto:courtney.grenville@campus-support.ca)

(b) Sent by fax to:

- (i) The Ministry at (250) 387-3750
- (ii) The Institution at 604-915-7290

(c) Mailed by prepaid registered mail to:

- (i) The Ministry: Governance and Quality Assurance Branch  
Ministry of Advanced Education  
PO Box 9883 Stn Prov Govt  
Victoria BC V8W 9T6
- (ii) The Institution at  
Courtney Grenville  
1800 - 400 Burrard Street  
Vancouver, BC V6C 3A6



Either of the Parties may give notice to the other of a substitute email contact, fax number or address from time to time. Any notice mailed by prepaid registered mail is deemed to be received two days after mailing.

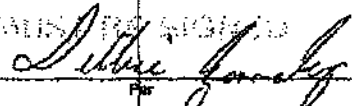
- 6.02 This Agreement, including all Schedules and the StudentAid BC Policy Manual and the StudentAid BC Administrative Manual, both located at <https://studentaidbc.ca/school-officials> website, and any other directives provided from the Ministry to the Institution, constitute the entire Agreement between the Parties.
- 6.03 The headings in this Agreement are for convenience of reference only and are not to be used as an aid in the interpretation of the Agreement.
- 6.04 If any provision of this Agreement is held to be invalid, illegal or unenforceable in any respect, such provision shall be treated as severable, and the remaining provisions will continue in full force so long as they express the intent of the Parties. If the intent of the Parties cannot be preserved, this Agreement shall be either replaced or terminated by the Ministry.
- 6.05 This Agreement is not assignable or transferrable by the Institution.
- 6.06 The Institution is responsible and liable for the acts, failures and omissions of all its officers, employees, agents and sub-contractors.
- 6.07 All obligations of the Institution under this Agreement shall survive termination of this Agreement and shall continue in full force until and unless they are satisfied or by their nature expire.

This Agreement has been executed on behalf of the Province by its legally authorized representative and on behalf of the Institution by its legally authorized representative, on the dates noted below.

**SIGNED, SEALED AND DELIVERED**

**THE PROVINCE** in the presence of:  
As represented by the Minister or designate:

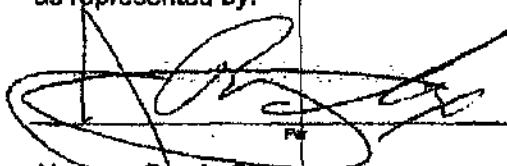
  
\_\_\_\_\_  
Witness

  
\_\_\_\_\_  
Name: Debbie Azarovsky  
Title: Director  
Date: May 27, 2014

Legal Name of Institution: Vancouver Career College (Burnaby) Inc (The "Institution")  
Visual College of Art and Design (VCAD) Operating Name of Institution

**THE INSTITUTION**  
as represented by:

  
\_\_\_\_\_  
Witness

  
\_\_\_\_\_  
Name: Randy Cox  
Title: President & CEO  
Date: May 22, 2014

Return To:  
Governance and Quality Assurance Branch  
Ministry of Advanced Education  
PO Box 8883 Stn. Prov. Govt.  
Victoria BC V8W 9T8



# Schedule C

## Signing Officers Information

Legal Name of Institution: Vancouver Career College (Burnaby) Inc. (The "Institution")  
Visual College of Art and Design of Vancouver Operating Name of Institution

StudentAid BC Institution Code A P U L  
(if previously assigned)

The following are designated as **Signing Officers** for the above named post secondary institution in accordance with the terms and conditions of the Designation Agreement.

### ENROLMENT SIGNING OFFICERS

**Enrolment Signing Officers:** who have responsibility and authority for registering the student, completing the enrolment contract and completing the Appendix 3 of the StudentAid BC application:

Name: David Su Position (Title): Student Financial Planner  
 Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: david.su@vcad.ca

*May 22, 2014*

Name: Denis Zhelenkov Position (Title): Student Financial Planner  
 Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: denis.zhelenkov@vcad.ca

### ELIGIBILITY SIGNING OFFICERS

**Eligibility Signing Officers:** who have responsibility and authority for confirming student enrolment and attendance, student loan agreements, confirmation of enrolment forms and accepting or documenting tuition payments to institutions:

Name: Pumima Parekh Position (Title): Financial Administrator  
 Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: pumima.parekh@vcad.ca

Name: Deej James Position (Title): Campus Director  
 Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: daej.james@vcad.ca

Ministry of  
Advanced Education

Return To:  
Governance and Quality Assurance Branch  
Ministry of Advanced Education  
PO Box 9683 Stn Prov Govt  
Victoria BC V8W 9T6

Courier address:  
3rd floor 835 Humboldt Street  
Victoria BC V8W 4W8  
Fax 250 387-3750



StudentAidBC

# Schedule C Signing Officers Information

Post Secondary School Name: VISUAL COLLEGE OF ART AND DESIGN

School code: APUL

The following are designated as Signing Officers for the above named post secondary institution in accordance with the terms and conditions of the Designation Agreement.

**Enrolment Signing Officers:** who have responsibility and authority for registering the student, completing the enrolment contract and completing the Appendix 3 of the StudentAid BC application:

*Add*

NAME (PRINTED)	V I V I A N H S I N G						
POSITION TITLE	F I N A N C I A L P L A N N E R / A D M I N I S T R A T O R						
TELEPHONE #	6 0 4 6 9 4 - 0 0 1 9	E-MAIL ADDRESS vivan.hsing@vcad.ca					
SIGNATURE		DATE		2 0 1 3	0 7	1 1	
		YEAR	MONTH	DAY			

NAME (PRINTED)	C A R O L I N E O G A W A						
POSITION TITLE	F I N A N C I A L P L A N N E R						
TELEPHONE #	6 0 4 6 9 4 - 0 0 1 9	E-MAIL ADDRESS caroline.ogawa@vcad.ca					
SIGNATURE		DATE		2 0 1 3	0 7	1 1	
		YEAR	MONTH	DAY			

**Eligibility Signing Officers:** who have responsibility and authority for confirming student enrolment and attendance, signing cheque remittance statements, student loan agreements, confirmation of enrolment forms and accepting or documenting tuition payments to schools:

*Add*

NAME (PRINTED)	P U R N I M A P A R E K H						
POSITION TITLE	F I N A N C I A L A D M I N I S T R A T O R						
TELEPHONE #	6 0 4 6 9 4 - 0 0 1 9	E-MAIL ADDRESS purnima.parekh@vcad.ca					
SIGNATURE		DATE		2 0 1 3	0 7	1 1	
		YEAR	MONTH	DAY			

NAME (PRINTED)	S E N G S E N G S A V A N H						
POSITION TITLE	C A M P U S D I R E C T O R						
TELEPHONE #	6 0 4 6 9 4 - 0 0 1 9	E-MAIL ADDRESS seng.sengsavanh@vcad.ca					
SIGNATURE		DATE		2 0 1 3	0 7	1 1	
		YEAR	MONTH	DAY			

Ministry of  
Advanced Education,  
Innovation and Technology

Governance  
and Quality  
Assurance  
Branch

Mailing Address:  
PO Box 9883 Stn Prov Govt  
Victoria BC V8W 9T6  
(250) 387-6100 (outside North America)  
1-800-561-1818 (Toll-free in Canada/US)

Course address:  
3rd flr 635 Humboldt Street  
Victoria, BC V8V 4W8  
Fax: (250) 387-3750  
Toll Free Fax: 1-866-312-3322

**PAMLACEY**  
SEP 16 2013



StudentAidBC

# Schedule C Signing Officers Information

Post Secondary School Name: VISUAL COLLEGE OF ART AND DESIGN

School code: APUL


The following are designated as Signing Officers for the above named post secondary institution in accordance with the terms and conditions of the Designation Agreement.

**Enrolment Signing Officers:** who have responsibility and authority for registering the student, completing the enrolment contract and completing the Appendix 3 of the StudentAid BC application:

NAME (PRINTED) VIVIAN HSING

POSITION TITLE FINANCIAL PLANNER / ADMINISTRATOR


TELEPHONE # 604 694-0019 E-MAIL ADDRESS vivian.hsing@vcad.ca

SIGNATURE  DATE 2013 07 11  
YEAR MONTH DAY

NAME (PRINTED) CAROLINE OGAWA

POSITION TITLE FINANCIAL PLANNER

TELEPHONE # 604 694-0019 E-MAIL ADDRESS caroline.ogawa@vcad.ca


SIGNATURE  DATE 2013 07 11  
YEAR MONTH DAY

**Eligibility Signing Officers:** who have responsibility and authority for confirming student enrolment and attendance, signing cheque remittance statements, student loan agreements, confirmation of enrolment forms and accepting or documenting tuition payments to schools:

NAME (PRINTED) PURNIMA PAREKH

POSITION TITLE FINANCIAL ADMINISTRATOR


TELEPHONE # 604 694-0019 E-MAIL ADDRESS purnima.parekh@vcad.ca

SIGNATURE  DATE 2013 07 11  
YEAR MONTH DAY

NAME (PRINTED) SENG SENGSAVANH

POSITION TITLE CAMPUS DIRECTOR

TELEPHONE # 604 694-0019 E-MAIL ADDRESS SENG.SENGSAVANH@VCAD.CA

SIGNATURE  DATE 2013 07 11  
YEAR MONTH DAY

Ministry of  
Advanced Education,  
Innovation and Technology

Governance  
and Quality  
Assurance  
Branch

Mailing Address:  
PO Box 9883 Str. Prov. Govt.  
Victoria BC V8W 9T6  
(250) 387-6100 (outside North America)  
1-800-561-1818 (Toll-free in Canada/US)

Courier address:  
3rd fl. 835 Humboldt Street  
Victoria, BC V8W 4W8  
Fax: (250) 387-5750

Section Free Fax: (250) 387-5322 ch  
MINISTRY OF ADVANCED EDUCATION



StudentAid

# Schedule C

## Signing Officers Information

Post Secondary School Name: Visual College of Art + Design

School code: APUL

The following are designated as Signing Officers for the above named post secondary institution in accordance with the terms and conditions of the Designation Agreement.

Enrolment Signing Officers: who have responsibility and authority for registering the student, completing the enrolment contract and completing the Appendix 3 of the StudentAid BC application:

NAME (PRINTED)													
POSITION TITLE													
TELEPHONE #				-						E-MAIL ADDRESS			
SIGNATURE							DATE						
							YEAR	MONTH	DAY				

Remove

NAME (PRINTED)	Purnima Parekh												
POSITION TITLE	Financial Administrator												
TELEPHONE #				-						E-MAIL ADDRESS			
SIGNATURE							DATE						
							YEAR	MONTH	DAY				

Eligibility Signing Officers: who have responsibility and authority for confirming student enrolment and attendance, signing cheque remittance statements, student loan agreements, confirmation of enrolment forms and accepting or documenting tuition payments to schools:

Remove

NAME (PRINTED)	Imran Molloo												
POSITION TITLE	Financial Administrator												
TELEPHONE #				-						E-MAIL ADDRESS			
SIGNATURE							DATE						
							YEAR	MONTH	DAY				

Remove

NAME (PRINTED)	Kanika Thawani												
POSITION TITLE	Financial Administrator												
TELEPHONE #				-						E-MAIL ADDRESS			
SIGNATURE							DATE						
							YEAR	MONTH	DAY				

Ministry of Advanced Education, Innovation and Technology

Governance and Quality Assurance Branch

Mailing Address: PO Box 9883 Stn Prov Govt Victoria BC V8W 9T6 (250) 387-6100 (outside North America) 1-800-561-1618 (Toll-free in Canada/US)

Counter address: 3rd Flr 835 Humboldt Street Victoria, BC V8V 4W8 Fax: (250) 387-3750 Toll Free Fax: 1-866-312-3322

Add

2014/2015

Signing Officers Information

Legal Name of Institution: Vancouver Career College (Burnaby) Inc. (The "Institution")
Visual College of Art and Design (VCAD) Operating Name of Institution

StudentAid BC Institution Code A P U L (if previously assigned)

The following are designated as Signing Officers for the above named post secondary institution in accordance with the terms and conditions of the Designation Agreement.

ENROLMENT SIGNING OFFICERS

Enrolment Signing Officers: who have responsibility and authority for registering the student, completing the enrolment contract and completing the Appendix 3 of the StudentAid BC application:

Name: Melissa Yagefnesky Position (Title): Student Financial Planner
Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: melissa.yagefnesky@vcad.ca

Name: Position (Title):
Area Code: ( ) Telephone Number: - Email Address:

ELIGIBILITY SIGNING OFFICERS

Eligibility Signing Officers: who have responsibility and authority for confirming student enrolment and attendance, student loan agreements, confirmation of enrolment forms and accepting or documenting tuition payments to institutions:

Name: Purnima Parekh Position (Title): Financial Administrator
Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: purnima.parekh@vcad.ca

Name: DeeJ James Position (Title): Campus Director
Area Code: (6 0 4) Telephone Number: 6 9 4 - 0 0 1 9 Email Address: dee.james@vcad.ca

Ministry of Advanced Education Return To: Governance and Quality Assurance Branch
Ministry of Advanced Education PO Box 9883 Stn Prov Govt Victoria BC V8W 9T6
Courier address: 3rd floor 836 Humboldt Street Victoria BC V8W 4W8 Fax 250 387-3750



To: s.22  
 Cc: Purnima Parekh/VCAD/CA/EMINATA@EMINATA, Caroline Ogawa/HOMKT/CA/EMINATA,  
 Rec:  
 Subject: Re: Fw: S.22 -VCAD link to BC student loan website

Hi s.22

This amount is supposed to be due first day of fall semester, which is September 30.

Have you followed up with BCSL and make sure everything is ok? You can also check your loan status by logging onto BCSL website.

Once you have the Notification of assessment, stating the approved funding and disbursement dates, please bring it to RM508.

We need this document to create the school loan disbursement form with your signature, and then the student loan funding can be released.

Please treat this as time sensitive matter so that your loan funding can come in with minimum delay.

Thank you for your attention.

**Vivian Hsing**

*Financial Planner / Administrator*

tel: 604 694 0019 fax: 604 456 2456  
 Vancouver Campus

vivian.hsing@vcad.ca  
 #500 – 626 West Pender Street  
 Vancouver, BC, V6B 1V9, Canada

www.vcad.ca



Caroline Ogawa FYI, please follow up with this current student's...

s.22

From: Caroline Ogawa/HOMKT/CA/EMINATA  
 To: Vivian Hsing/VCAD/CA/EMINATA@EMINATA, Purnima Parekh/VCAD/CA/EMINATA@EMINATA  
 Date: s.22  
 Subject: s.22 -VCAD link to BC student loan website

VCAD student loan results and disbursement form

From: SFP - 508 - Caroline

To: [redacted]

Names: VCAD-SC-Inv.pdf(929-Kb)

Hi [redacted]

I hope you are doing well.

I wanted to let you know that your student loan results have come in.

You have been approved for a total amount of [redacted] including grants, BC and Canada student loans for your [redacted] study period.

From the approved amount, VCAD is expected to receive [redacted] to cover your 1st year tuition and book fees and you will receive [redacted] once you start the program.

Please see attached VCAD student loan/grant disbursement form.

Please print this out, sign, date and forward the signed copy back to me via email/scan or by fax no later than s.22

If you have any questions or concerns, please let me know.

Thank you,

Caroline Ogawa  
Student Financial Planner

Email: [caroline.ogawa@vcad.ca](mailto:caroline.ogawa@vcad.ca)

Visual College of Art and Design of Vancouver  
5th Floor, 626 West Pender Street  
Vancouver, BC V6B 1V9  
Tel: 604-694-0019 Ext. 2351  
Toll free: 1-877-694-0019  
Fax: 604-456-2456

[www.vcad.ca](http://www.vcad.ca)

*Why is school informing student of this?*







**VCAD** s.22  
Vivian Hsing s.22

student loan follow up

s.22

Hi s.22

I hope you are doing well.

I am writing to follow up with you regarding your student loan application result.

Please log onto BCSL and print the updated Notification of Assessment and forward it to me.

If you need assistance, please provide me your user ID & password, so that I can obtain it for you.

Another option is that you can drop by during my drop-in hours Mon- Fri 8:30-9:30 & 12:30-2:30 and we can find it together.

Please reply **no later than next S.22**

Thank you.

**Vivian Hsing**

*Financial Planner / Administrator*

tel: 604 694 0019 fax: 604 456 2456  
Vancouver Campus

vivian.hsing@vcad.ca  
#500 – 626 West Pender Street  
Vancouver, BC, V6B 1V9, Canada

[www.vcad.ca](http://www.vcad.ca)





s.22

s.22

Dear s.22

**Re: BC Loan Reduction Program**

We are pleased to advise you that based on your application for student financial assistance in the s.22 S.2 academic year, you are eligible for the BC Loan Reduction Program. Effective s.22, the outstanding BC portion of your Canada – BC integrated student loan will be reduced by s.22. For further information, including contact telephone numbers, please visit [www.StudentAidBC.ca](http://www.StudentAidBC.ca).

The amount of loan reduction you receive depends on your financial need, determined by StudentAid BC, and completion of your academic year. If an audit or information from your institution should change your eligibility for the program, the payment may be rescinded, increasing the outstanding BC portion of your Canada – BC integrated student loan.

In the past two years, 47,625 students have benefited from the BC Loan Reduction Program with an investment of over \$76 million.

I would like to extend congratulations to you for the completion of your studies and receipt of the BC Loan Reduction award, and wish you success in your future endeavours.

If you have questions, please contact StudentAid BC at 1-800-561-1818.

Sincerely,

Sandra Carroll  
Deputy Minister

Ministry of  
Advanced Education

Office of the  
Deputy Minister

Mailing Address:  
PO Box 9884 Stn Prov Govt  
Victoria BC V8W 9T6

Telephone: 250 356-5170  
Facsimile: 250 356-5468

s.22



s.22

s.22

Dear S.22

**Re: BC Loan Reduction Program**

We are pleased to advise you that based on your application for student financial assistance in the s.22 academic year, you are eligible for the BC Loan Reduction Program. Effective s.22 the outstanding BC portion of your Canada – BC integrated student loan will be reduced by s.22 For further information, including contact telephone numbers, please visit [www.StudentAidBC.ca](http://www.StudentAidBC.ca).

The amount of loan reduction you receive depends on your financial need, determined by StudentAid BC, and completion of your academic year. If an audit or information from your institution should change your eligibility for the program, the payment may be rescinded, increasing the outstanding BC portion of your Canada – BC integrated student loan.

In the past two years, 47,625 students have benefited from the BC Loan Reduction Program with an investment of over \$76 million.

I would like to extend congratulations to you for the completion of your studies and receipt of the BC Loan Reduction award, and wish you success in your future endeavours.

If you have questions, please contact StudentAid BC at 1-800-561-1818.

Sincerely,

Sandra Carroll  
Deputy Minister

Ministry of  
Advanced Education

Office of the  
Deputy Minister

Mailing Address:  
PO Box 9884 Stn Prov Govt  
Victoria BC V8W 9T6

Telephone: 250 356-5170  
Facsimile: 250 356-5468

s.22

June 25, 2015  
13:22:36

Ministry of Advanced Education  
Verification Statistics System

Case Comments

SIN	S.22	School Name	C D I CAREER DEVELOPEMENT INST. L	Status	Active
Last Name	CDI - BURNABY	Year Of Audit	98/99		
First Name		Open Date	1998-12-17		

MABE 2014-04-22 From: Callow, Sharlane AVED:EX  
Sent: Tuesday, April 22, 2014 9:40 AM  
To: 'Courtney Grenville'  
Cc: 'Eddie Jonathan'  
Subject: RE: Improvement Plan - CDI College

Ms. Grenville,

This is to confirm we are in receipt of your institution's repayment plan. Thank you for your attention to this matter.

Sharlane Callow

MABE 2014-04-16 As per Sharlane Callow:

Dear Ms. Grenville,

In response to your email below, we defer to the institution to make the determination of how best to structure the improvement plan and its strategies based on their individual business model (i.e. one plan for all, one plan for each institution or combination based on business practices, areas of concern, programs delivered, etc).

I trust this addresses your inquire. If you require any additional information or clarification please do not hesitate to contact me directly.

Regards,

Sharlane Callow

June 25, 2015  
13:31:13

Ministry of Advanced Education  
Verification Statistics System

Case Comments

SIN	S.22	School Name	University Canada West	Status	Active
Last Name	UNIVERSITY CANAD	Year Of Audit	06/07		
First Name	WEST ACADE	Open Date	2007-02-15		

MABE 2014-12-02 On-site compliance review on October 21, 2014.

Mark Bennett and Ingrid Thorleifson conducted the review.

Compliance review report is saved in the institutions folder on the shared drive.

June 25, 2015  
13:58:27

Ministry of Advanced Education  
Verification Statistics System

3

**Case Comments**

SIN	S.22	School Name	C D I CAREER DEVELOPMENT INST.LT	Status	Active
Last Name	CDI	Year Of Audit	06/07		
First Name	SURREY	Open Date	2006-09-18		

Sharlane Callow

MABE 2014-04-16 As per Sharlane Callow:

Dear Ms. Grenville,

In response to your email below, we defer to the institution to make the determination of how best to structure the improvement plan and its strategies based on their individual business model (i.e. one plan for all, one plan for each institution or combination based on business practices, areas of concern, programs delivered, etc).

I trust this addresses your inquire. If you require any additional information or clarification please do not hesitate to contact me directly.

Regards,

Sharlane Callow

SSOR 2014-03-17 Compliance referral - CDI College withholding a students living allowance till graduation.

Student: S.22

Course: Rehab Assistant (WCD7)

Complaints:

1. Student insists the school withheld S. living allowance till graduation S.22

Spoke with financial officer (Balvinder Bains) regarding students file. FO recalls having a conversation with the student regarding S. living allowance and says S. made the necessary adjustments to accommodate the student. FO denies any such practice within the school as withholding money goes against the basic concept of student loan funding.

Spoke with student S.22 who insists the school purposefully withheld S. living allowance till graduation even after conversations with Balvinder Bains. From disbursements provided by the school and according to SPAS (see email thread under institutions in compliance inbox), students disbursements appear to have went out on time and to the appropriate place. No further action is required.

June 25, 2015  
13:58:27

Ministry of Advanced Education  
Verification Statistics System

4

Case Comments

SIN	S.22	School Name	C D I CAREER DEVELOPMENT INST.LT	Status	Active
Last Name	CDI	Year Of Audit	06/07		
First Name	SURREY	Open Date	2006-09-18		

\*\*\*\*\* Note \*\*\*\*\*

Student was unaware of disbursement options – please make note next time on-site to see if school is taking the necessary pre-budget counselling steps with prospective students, as well as, ensuring students are informed of the payment schedule and its processes.

2. Student has not received diploma or transcript since graduation

Spoke with school administrator student diploma and transcripts are on file. Received a copy of both as proof (these can be found in an e-mail under the institution in the compliance inbox). No further action required.

3. Student unhappy to learn that the credits earned through this particular program were not transferable towards university courses.

Asked student if S was misled by the institution in a way that S was given information that suggested otherwise – S said no. Advised the student it is S responsibility to do the due diligence necessary when researching a school and the transferability of credits, student understood. No further action is required.

MABB 2014-01-23

Compliance referral received from Student Support Officer, Mike Darche regarding a student changing programs.

Student S.22 submitted an appendix 7 and the school submitted the corresponding appendix 3 to correct the program from VAF7 to TBK7. Funding has already been disbursed for the original program which began S.22  
S.22 The x7 and x3 indicate the new program began S.22  
S.2 but the school did not submit a withdrawal.

Call to FAO, confirmed the dates indicated on the x7 and x3 are incorrect. The new program start and end dates are the same as the original program dates. Also, the student has continuously attended class, therefore a withdrawal is not required. A new x7 and x3 are forthcoming to correct the program start/end dates.

No further action from Compliance Unit required at this time.



October 15, 2014

Mr. Chris Velasco  
Director  
CDI College of Business, Technology & Health Care  
950 Kings Rd  
Victoria BC V8T 1W6

Dear Mr. Velasco:

CDI College of Business, Technology & Health Care is currently designated to make StudentAid BC funding available to eligible students enrolled in approved programs, in accordance with its Designation Agreement with the Ministry.

Administration of StudentAid BC funding requires that designated institutions adhere to the requirements of the Designation Agreement and StudentAid BC policy and administration manuals. To ensure institutions understand and are compliant with these requirements, Ministry Compliance Officers will be conducting an on-site inspection.

Section 5.00 of your Designation Agreement states that, for the purpose of an inspection, you will allow Ministry officials to attend the premises of your institution and cooperate fully with Compliance Officers in the conduct of their duties under the Agreement.

This letter is to inform you that Compliance Officers, Mark Bennett and Ingrid Thorleifson will be visiting your institution on Tuesday, October 21, 2014 at 8:30 a.m. Please ensure that the following is available at that time:

- 1) Upon arrival we will provide you with a list of the student and school files we will be reviewing on-site. Please ensure there are institution resources available to pull and or copy the required records. Please refer to pages 5-37 and 5-38 of the StudentAid BC Administration Manual (located on the StudentAid BC website) for a list of the records that must be available for review. Please ensure records (i.e. ongoing attendance and payment information) are up to date, even for students who are currently in studies.
- 2) Time with you in the morning to take a tour of the school and to discuss Ministry expectations with respect to default management and best practices for institutions.

.../2

---

**Ministry of  
Advanced Education**

Post-Secondary Audit  
and Accountability Branch

Mailing Address:  
PO Box 9870 Stn Prov Govt  
Victoria BC V8W 9T5

Location Address:  
5th Floor, 835 Humboldt Street  
Victoria BC V8V 4W8

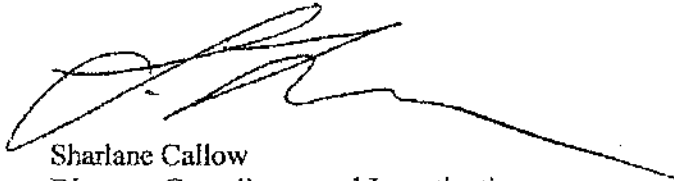
Telephone: (250) 356-1779  
Facsimile: (250) 387-1377

- 3) The institution's copy of the current Designation Agreement, Amending Agreement and Schedule C.
- 4) A quiet room for three Ministry staff to review the files.
- 5) Access to photocopying facilities.

After reviewing the files, the compliance officers will meet with you and any of your staff who have signing authority for StudentAid BC to discuss findings and answer any questions you may have. The visit is expected to conclude at approximately 4:30 p.m.

If you have any questions, please do not hesitate to call me at (250) 356-7210.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sharlane Callow', with a long horizontal flourish extending to the right.

Sharlane Callow  
Director, Compliance and Investigations





### StudentAid BC - Designation Monitoring Compliance Review Report

Institution Code	Institution Name	Date of Compliance On-site	Time
APSH	<b>Legal Name of Institution</b>	2014 / 10 / 21 Year / Month / Day	<b>Start</b>
	Vancouver Career College Inc		8:30 am
	<b>Operating Name of Institution</b>		<b>End</b>
	CDI College of Business, Technology and Healthcare - Victoria		4:00 pm
<b>Name of Compliance Officer(s)</b>		<b>Signature of Lead Compliance Officer</b>	
Mark Bennett (Lead) Ingrid Thorleifson			
<b>Type of Inspection:</b> <input checked="" type="checkbox"/> Routine Compliance <input type="checkbox"/> Follow-up Visit			
<b>Institution Information</b>			
<u>Address (On-Site Visit)</u>		<u>Contact</u>	
Street:	950 Kings Rd	Contact Name:	Chris Velasco
Suite #:		Contact Title:	Director
City:	Victoria	Telephone:	(250) 978-1800
Province:	BC	Facsimile:	
Postal Code:	V8T 1W6	Email Address:	chris.velasco@cdicollege.ca
<u>Mailing Address (if different from above)</u>			
Street:			
Suite #:			
City:			
Province:			
Postal Code:			

<b>PART A</b>	<b>NATURE AND SCOPE OF COMPLIANCE INSPECTION</b>
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- Objectives:**
- This review is intended to ensure administrative compliance with terms and conditions outlined in the StudentAid BC Designation Agreement.
- Scope:**
- Discussion with institution officials regarding default management and repayment improvement strategies.
  - Review the administration of StudentAid BC funding and records.

<b>PART B</b>	<b>FINANCIAL RISK ASSESSMENT</b>
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Indicator	Data
2013 Repayment Rate (CSL) - students who consolidated between Aug. 1, 2011 - July 31, 2012	67%
2012 Repayment Rate (CSL) – students who consolidated between Aug.1, 2010 – July 31, 2011	70.1%
StudentAid BC Withdrawal Rate – students who withdrew between Aug.1, 2012 and July 31, 2013 (as of November 29, 2013)	24%
Amount of dollars in delinquency	\$104,843
Amount of dollars funded	\$317,951
Number of students funded	42

- Notes:**
- The average StudentAid BC Withdrawal Rate for BC private schools was 13%.
  - The average 2013 Canada Student Loan Repayment Rate for BC private institutions was 80.0%

<b>PART C</b>	<b>PURPOSE OF VISIT DISCUSSIONS</b>
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Check-in discussion with School Officials to convey purpose of visit.  <b>Institution representatives present for discussion (name, title):</b> Mallory Graitson – Admissions Officer Sylvia Andre – Financial Administrator Chris Velasco – Director	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain.
Check-out discussion with School Officials to discuss findings.  <b>Institution representatives present for discussion (name, title):</b> Mallory Graitson – Admissions Official	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please explain.

Sylvia Andre – Financial Administrator Chris Velasco – Director	
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<b>PART D</b>	<b>DEFAULT MANAGEMENT</b>
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<p><b>1. Does the institution ensure funded students are aware of the refund policy prior to enrolment?</b></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a
<p><b>2. Has the institution implemented the strategies outlined in its Improvement Plan?</b></p> <p>Section 3.1.4 of your institution’s 2014 Improvement Plan states that a review team reviews all new enrolment files (pre-requisites and financial status). This is to ensure each student is financially secure and committed to his or her studies prior to starting. <b>Any students applying for student loans that have an unmet need over \$5,000 are reviewed to see if a solid plan for success is in place.</b></p> <p>Section 3.2.1 of your institution’s 2014 Improvement Plan states that if a student’s financial obligations appear to be sound, the student is accepted; however, if there is some question, further interviewing and securing of a payment plan is requested before starting the program and a budget worksheet is completed to identify funding shortfalls and lack of living expenses that may be a challenge.</p> <p><b>Findings:</b></p> <p>Our review of student records indicated that some enrolling students were not financially prepared to meet the tuition and living costs associated with their programs. Students <u>S.22</u> completed budget worksheets as part of the enrolment screening process; however, the budget worksheets revealed that these students not only had high unmet need, but also demonstrated financial instability. Despite the warning signs, these students were enrolled and later withdrew from their studies shortly into their programs.</p> <p><b>Although your institution has implemented the use of a budget worksheet, it is recommended that further consideration should be made when determining whether a student has sufficient resources in place to meet the potential costs associated with their program prior to enrolment.</b></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> n/a
<p><b>3. Discussed the following default management practices including student support and budget counselling.</b></p> <p>On-site we discussed best practices that the institution can implement to maintain low withdrawal rates through enhanced student recruitment and screening practices. Institutions should enhance their student recruitment and screening processes to ensure:</p> <ul style="list-style-type: none"> <li>• Students have the aptitude and are financially prepared for their desired program of study.</li> </ul>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a

Institutions are encouraged to consider the following best practices in the area of pre-enrolment counselling:

- Institutions should assess whether potential students have a realistic financial plan in place to successfully maintain an extended period of full time studies.
- Student loan applications should be submitted and approved (i.e., a Notification of Assessment has issued) before the proposed study period start date and prior to contract signing. For planning purposes, students requiring financial assistance should be aware of the amount of StudentAid BC (SABC) financial assistance that will be available to them prior to signing an enrolment contract.
- There is a correlation between high unmet need for students enrolled in certificate and diploma programs (as indicated on the SABC Notification of Assessment) and the likelihood of a student withdrawing from studies. Students enrolled in certificate and diploma programs with high unmet need may require extra planning, counselling and guidance.
- Institutions should ensure that prospective students clearly understand the institution's payment schedule and the amount of loan funding that would be directed to the institution (the amount owing to the school for tuition and fees, as well as when and how it is to be paid).
- Students who do not have adequate resources should be encouraged to postpone studies until such time as it is financially feasible.

**Observations:**

- Our compliance review revealed that a significant number of students were withdrawing from their programs early into the study period - S.22  
S.22 In their withdrawal notification letters to the school, a number of students indicated that their withdrawals were a result of their financial circumstances. This suggests that institution staff, prior to enrolment, are not adequately assessing students' financial position to ensure their ability to meet tuition and living expenses for the duration of their programs.

**In order to support student planning and decision making, it is recommended that the institution enhance its pre-enrolment financial counselling as per the best practices listed in Part D, question 3 above. Also, further analysis of students who withdraw from their programs is required, particularly those students who withdraw early into the study period, to establish new strategies of identifying who is at risk of withdrawal.**

Please see the [Repayment Resource Guide Planning for Student Success](#) on the StudentAid BC website. This guide has many other suggestions and best practices that schools can undertake to influence repayment rates at their school.

<b>PART E</b>	<b>FINDINGS: ADMINISTRATIVE COMPLIANCE</b>
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<p><b>1. Does the Designation Agreement kept at the institution match the copy kept at the ministry? If no, explain.</b></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a
<p><b>2. Are the institution's signing officers recorded on the Schedule C? If no, explain.</b></p> <ul style="list-style-type: none"> <li>• The Institution's copy of the Schedule C form lists <b>Nici Castellani</b> and <b>Chris Velasco</b> as Enrolment Signing Officers, and <b>Sylvia Andre</b> as an Eligibility Signing Officer.</li> <li>• The Ministry's copy of the Schedule C form lists <b>Chris Velasco</b> and <b>Sylvia Andre</b> as Enrolment Signing Officers and <b>Kate Sabaranska</b> and <b>Nici Castellani</b> as Eligibility Signing Officers.</li> </ul> <p>The Ministry's copy of the Schedule C form does not match the Schedule C form kept at the Institution. Please submit a copy of your Institution's most recent Schedule C form to the Ministry.</p> <p><i>2012 Designation agreement Sections 4.03 – 4.04 and 4.06 – 4.08</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> n/a
<p><b>3. Is separation between signing officers upheld? If no, explain.</b></p> <p>Of the student files reviewed onsite, there were no instances where a signing officer had signed an incorrect document; however, as the Ministry currently does not have the correct Schedule C form, we are unable to accurately confirm the correct signing authorities on future documentation.</p> <p><i>2012 Designation agreement Sections 4.05</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a
<p><b>4. Does the Institution's advertising make false or misleading statements, or guarantee that students attending the institution will receive financial assistance?</b></p> <p><i>Responsibilities of Institutions – 2013/2014 StudentAid BC Policy Manual, #12 pg. 13</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> n/a
<p><b>5. Is the Appendix 3 information regarding the program duration and costs consistent with the signed student enrolment contract? If no, explain.</b></p> <p>S.22                      This student's Appendix 3 lists tuition and fees of S.22 while the enrolment contract lists S.22</p> <p>S.22                      This student's Appendix 3 lists tuition fees of S.22 while the enrolment contract lists S.22</p> <p>S.22                      This student's Appendix 3 lists tuition and fees of S.22 however, the student's enrolment contract indicates that the student received a scholarship in the amount of S.22 which was not declared or reflected in the total costs listed on the Appendix 3.</p> <p>Provide an explanation for the discrepancies between the Appendix 3 and the</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> n/a

<p>Enrolment Contract for S.22 as well as changes to the existing procedures that the institution will implement to ensure that all appropriate Appendix 3 entries for tuition, books, fees, program duration and scholarships match those entered on the Enrolment Contract.</p> <p><i>2012/2013 StudentAid BC Administration Manual Section 4</i></p>	
<p>6. Do the cumulative total of all funds directed to the school from a student's StudentAid BC disbursements exceed the allowable education costs reported on the approved Program Eligibility Document?</p> <p><i>2012/2013 StudentAid BC Administration Manual Sec 5-52, bullet# 3; 2013/2014 StudentAid BC Policy Manual pg.43 (d)</i></p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> n/a
<p>7. Are the Program Eligibility Document details consistent with the Private Career Training Institutions Agency program information and Appendix 3 details?</p> <p>S.22 This student's Appendix 3 lists tuition and fees of S.22 for 28 weeks in duration for the Addictions and Community Support Worker program while the Program Eligibility Document lists tuition and fees of S.22 for 45 weeks in duration. Please explain why the tuition and fees, as well as the program duration on this student's Appendix 3 do not match those listed on the Program Eligibility Document.</p> <p>S.22 This student's Appendix 3 lists tuition and fees of S.22 for the Addictions and Community Support Worker program while the Program Eligibility Document lists tuition and fees of S.22. Please explain why the tuition and fees listed on this student's Appendix 3 do not match those listed on the Program Eligibility Document.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> n/a
<p>8. Is attendance monitoring and tracking meeting ministry expectations? If no, explain.</p> <p><b>Comment:</b></p> <p>The column listing the required hours of attendance should match the actual required hours, i.e. when students are on practicum, this column should reflect how many hours students are expected to attend during the practicum. Currently, attendance records show the required hours of attendance to be 25 hours per week for all study weeks, despite the fact that students generally attend 40+ hours per week while on practicum.</p> <p><i>Attendance Procedures StudentAid BC Administration Manual 2012/2013 pg.39-40; 2014/2015 SABC Administration Manual pg. 50-51.</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a
<p>9. Are student withdrawals reported to the ministry as required? If no, explain.</p> <p><i>Identifying a Student Withdrawal 2011/2012 StudentAid BC Policy Manual pg.157; 2014/2015 StudentAid BC Policy Manual pg.118.</i></p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a
<p>10. Is the institution maintaining student records in accordance with ministry expectations? If no, explain.</p> <p>Overall, student files contained the necessary documentation as outlined in the StudentAid BC Administration Manual (Pages 48 - 49).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a

*Student File Documentation 2012/2013 StudentAid BC Administration Manual Sec 5 pg.37-38; 2014/2015 Sec 5 pg.48-49.*

**11. Other administrative compliance issues**

**Entrance requirements:**

Criminal Record checks are listed as an entrance requirement on the PCTIA website for many of your Institution's programs. However, an institution representative, Ms. Kate Sabaranska, contacted StudentAid BC on November 14, 2013 to advise that student **S.2 S.22** would have to wait for 3 weeks to begin S. practicum as S. criminal record check was not complete.

Although the institution normally submits Criminal Records checks for potential students a few weeks prior to their enrolment, it is important that students are not enrolled in a program that requires a clear criminal records check until all of the entrance requirements are satisfied (i.e., criminal records checks are complete).

*Securing placements for practice education 2014/2015 StudentAid BC Policy Manual pg. 3*

**Program hours:**

The Early Childhood Education program is 25 hours per week for 43 weeks in duration and consists of 1195 instructional hours (including 432 practicum hours) as reported on the 2014/2015 Program Eligibility Document (PED). However, 25 hours per week over 43 weeks only amounts to 1075 hours, a difference of 120 hours as declared on the PED. Please account for the additional 120 instructional hours listed on the 2014/2015 Program Eligibility Document for the Early Childhood Education program.

Also, as per StudentAid BC Policy, practicum hours cannot exceed 20% of the total duration of a program. Currently, 432 practicum hours exceeds 20% of the total calculated program hours for the Early Childhood Education program.

Unless an exception was granted by the Designation Unit, please provide confirmation that the practicum hours for the Early Childhood Education program are amended to ensure they do not exceed 20% of the total duration of the program.

**Refunds:**

We found refund calculation records in the files of students who had withdrawn prior to reaching 10 or 30 percent of the duration of their programs. Correspondence was also mailed to these students to advise them of the refund amount; however, we are unable to confirm that these funds have been returned to the National Student Loan Service Centre.

Please explain why the National Student Loan Service Centre has not received confirmation of tuition refunds for students **S.22**

**S.22**

<b>PART F</b>	<b>CLOSING THE COMPLIANCE INSPECTION</b>
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The institution has been advised that they will receive a formal Compliance Inspection Report.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> n/a
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Additional notes on discussions and observations:
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<b>PART G</b>	<b>SUMMARY OF FINDINGS</b>
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<b>EXAMPLES OF BEST PRACTICES NOTED:</b>
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#	Description
1	Student files are maintained in compliance to SABC Policy. The files were readily accessible and included all of the required documentation as outlined in the StudentAid BC Administration Manual (Pages 48 - 49).
2	Withdrawal documentation included in the student files is readily accessible and accurate.
3	The institution issues warnings to those students who are at risk of withdrawal due to unsatisfactory attendance during their programs.

<b>RECOMMENDATIONS FOR IMPROVEMENT:</b>
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#	Description
1	Although your institution has implemented the use of a budget worksheet, it is recommended that further consideration should be made when determining whether a student has sufficient resources in place to meet the potential costs associated with their program prior to enrolment.
2	In order to support student planning and decision making, it is recommended that the institution enhance its pre-enrolment financial counselling as per the best practices listed in Part D, #3 above. Also, further analysis of students who withdraw from their programs is required, particularly those students who withdraw early into the study period, to establish new strategies of identifying who is at risk of withdrawal.

<b>ACTION REQUIRED:</b>
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#	Description	Due Date
1	Please submit a copy of your institution's most recent Schedule C form to the Ministry.	December 19, 2014
2	Provide an explanation for the discrepancies between the Appendix 3 and the Enrolment Contract for S.22 and S.22 as well as changes to the existing procedures that the institution will implement to ensure that all appropriate Appendix 3 entries of tuition, books, fees and program duration match those listed on the Enrolment Contract.	December 19, 2014
3	Student S.22 Please explain why the tuition and fees, as well as the program duration listed on this student's Appendix 3 do not match those listed on the Program Eligibility	December 19, 2014



	Document.	
4	S.22 Please explain why the tuition and fees listed on this student's Appendix 3 do not match those listed on the Program Eligibility Document.	December 19, 2014
5	Please account for the additional 120 instructional hours listed on the 2014/2015 Program Eligibility Document for the Early Childhood Education program.  Unless an exception was granted by the Designation Unit, please provide confirmation that the practicum hours for the Early Childhood Education program are amended, ensuring that they do not exceed 20% of the total duration of the program.	December 19, 2014
6	Please explain why the National Student Loan Service Centre has not received confirmation of tuition refunds for students S.22	December 19, 2014

<b>PART H</b>	<b>REPORT SIGN OFF</b>
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Reviewed by: Sharlane Callow – Director, Compliance and Inspections
Signature:
Date: November 18, 2014



November 18, 2014

Our Ref. 98472

Mr. Chris Velasco  
Director  
CDI College of Business, Technology and Healthcare  
950 Kings Rd  
Victoria BC V8T 1W6

Dear Mr. Velasco:

In follow-up to our recent on-site visit on October 21, 2014, the enclosed report details the findings of our compliance review, including recommendations for improvement and actions required with expected completion dates. The report is based on the sample of files that Ministry Compliance Officers reviewed.

As outlined in Chapter 1 of the 2014/2015 StudentAid BC Policy Manual, designated institutions must continuously comply with the requirements specified in the Designation Agreement including adhering to StudentAid BC policies and administrative procedures.

Institutions are selected for compliance review based on an assessment in which the Ministry reviews risk factors (criteria identified in Chapter 1, Section 2 of the StudentAid BC Policy Manual) and materiality (total principal in delinquency) of that risk. Institutions with risk and materiality will have a higher priority when being considered for review; however, institutions with lower materiality may also be selected for review if there is a risk or concern that warrants a compliance visit. Please see the attached Appendix (Designation Monitoring - Criteria for Review) for further details.

Institutions selected for compliance review are chosen based on an assessment of the following factors:

- Portfolio Performance
- Institution Performance
- Student Performance

For further explanation of the factors listed above, please refer to the Designation Monitoring – Criteria for Review document provided below.

.../2

Please note, as a requirement of maintaining designation, institution officials must actively monitor all borrowers receiving StudentAid BC funding and provide assurance with respect to all documents and processes. Failure to follow the procedures outlined in the Designation Agreement, the StudentAid BC Policy Manual and StudentAid BC Administration Manual, or participation in any other actions that jeopardize the integrity of the StudentAid BC program may result in designation not being renewed or other restrictions on the institution.

To access the 2014/2015 StudentAid BC Policy Manual, please visit the StudentAid BC website at <https://studentaidbc.ca/school-officials/index.php>

Thank you for your cooperation and assistance in conducting this review. If you have any questions or concerns please do not hesitate to contact me at (250) 356-7210 or by e-mail at: [Sharlane.Callow@gov.bc.ca](mailto:Sharlane.Callow@gov.bc.ca)

Sincerely,

Sharlane Callow  
Director, Compliance and Investigations

Attachments: Compliance Review Inspection Report – October 21, 2014  
Appendix 1: Designation Monitoring- Criteria for Review

## Designation Monitoring - Criteria for Review

Performance Indicator	Criteria	Description
Portfolio Performance	Repayment Rate (most current available and recent history)	The loan repayment rate of the borrowers who consolidated their loans has not been maintained at an acceptable level.  <i>Note: The institution may have been required to submit a loan improvement plan.</i>
	Loan Principal (delinquent and defaulted)	The institution has a material amount of loan principal in delinquency or default.
Institution Performance	Last On-site Inspection	The institution has never had a compliance on-site inspection or has not had an on-site visit recently.
	Newly Designated School	The institution has recently gained designation status.
	Change of Ownership	The institution had a recent change of ownership.
	Designation History	The institution has a history of poor compliance with the Designation Agreement and SABC policies and/or administration procedures which are unresolved.
	Enrolment	The institution has a significant number of borrowers attending an institution.
	Change in Enrolment	The institution experienced a significant increase in enrolment over the previous year/ or years.
Student Performance	Withdrawal Rate (most current available and recent history)	A comparison of the institution's withdrawal rate to the BC average.
	Completion Data	<i>Note: BC private post-secondary institution data not available.</i>
	Employment Data	<i>Note: BC private post-secondary institution data not available.</i>

INSTITUTION: CDI College of Business, Technology and Health

LOCATION: Victoria

DATE OF ON-SITE REVIEW: Tuesday, October 21, 2014 – 8:30 am

For our review, please provide your institution's:

- Designation Agreement
- Schedule C

In addition, please provide the student contract file, including attendance records, for each of the following students:

s.22

## Reardon, Cora AVED:EX

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**From:** Cushner, Trina M AVED:EX  
**Sent:** Tuesday, October 14, 2014 2:14 PM  
**To:** Callow, Sharlane AVED:EX  
**Cc:** Thorleifson, Ingrid AVED:EX  
**Subject:** CDI Victoria - Estimated Refund Calculations

Hi Sharlane,

I've reviewed this for Mark, per his email below, and made some changes.

Trina



CDI Victoria -  
Refund calculat...

**From:** Bennett, Mark AVED:EX  
**Sent:** Friday, October 10, 2014 4:01 PM  
**To:** Thorleifson, Ingrid AVED:EX; Cushner, Trina M AVED:EX  
**Subject:** CDI Tuition refunds

Hello everyone,

I need a favour as I have run short of time. Monica at PCTIA has asked that I pass along some information to Sharlane concerning CDI's tuition refund process. I have attached a document containing students from different programs as examples; however, I have not had time to confirm the information is 100% accurate.

Monica advised that PCTIA is currently in the process of completing CDI's 5 year review and wanted the information by Tuesday, but I will be off that day. Would anyone mind reviewing the information for accuracy and forwarding it to Sharlane to send to Monica for me??

Thanks,

**Mark Bennett | Compliance Officer**  
Post Secondary Audit and Accountability Branch  
Ministry of Advanced Education  
☎ (250) 387-7450

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CDI College of Business, Tech & Health – Victoria APSH

In preparation for a compliance inspection of CDI Victoria, the following sample of students was chosen. The school reported withdrawal dates to StudentAid BC that appear to be prior to the 10% or 30% program duration mark. Our records indicate that no refunds have been issued by the institution to the students' loan accounts.

s.22

Page 64

Withheld pursuant to/removed as

s.22



Last Name	First Name	SIN	Study Start Dte	Study End Dte	SSD Age	Withdrawal Date	Tuition Amount	CL	NAR Wks	Calc Week	Calc Days	Books Amt	Pla
<b>TFQ7 - Social Services Worker – Recovery Specialist Diploma.</b>													
s.22							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1900	
							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1805	N
							\$13,900	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1805	N
							\$14,200	100	47	44	4	1900	N
							\$5,616	100	17	17	4	0	Y
							\$14,200	100	47	44	4	1900	N
							\$14,200	100	47	44	4	1802	N

s.22

\$14,200	100	47	44	4	1805	N
\$13,177	100	47	44	4	1900	N
\$14,200	100	47	44	4	1900	N
\$14,200	100	47	44	4	1805	N
\$14,200	100	47	44	4	1900	N
\$14,200	100	47	44	4	1805	N
\$14,200	100	47	44	4	1805	N

**TFU7 - Social Services Worker – Recovery Specialist Diploma.**

s.22

\$10,014	100	26	27	4	466	N
\$10,014	100	30	28	4	466	N
\$10,014	100	30	28	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	3	466	N
\$10,014	100	30	28	4	466	N
\$10,014	100	26	24	4	466	N
\$13,178	100	30	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	26	27	0	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	3	466	N

s.22

\$10,014	100	26	26	4	466	
\$10,014	100	30	26	4	466	
\$10,014	100	30	28	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	3	466	N
\$5,675	100	30	29	4	0	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	29	0	466	N
\$10,014	100	30	28	4	466	N
\$10,014	100	30	28	4	466	N
\$10,012	100	26	26	2	466	N
\$10,014	100	30	27	3	455	N
\$10,014	100	30	27	3	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	34	27	4	466	N
\$10,014	100	26	27	4	466	N
\$9,014	100	26	27	4	466	N
\$10,014	100	26	27	4	466	N

s.22

\$10,014	100	30	27	3	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	26	24	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	28	4	466	N
\$10,014	100	26	26	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	26	26	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	26	27	4	466	N
\$10,014	100	30	27	4	466	N
\$10,014	100	30	27	3	466	N
\$10,014	100	30	28	4	466	N
\$10,014	100	34	30	4	466	N
\$10,014	100	30	28	3	466	N
<hr/>						
\$13,178	100	47	44	4	2185	N
\$13,177	100	43	44	4	2185	

WAA7 - Addictions and Community Service Worker Diploma

s.22

s.22

\$13,178	100	47	44	4	2185	N
\$13,177	100	43	44	4	2185	N
\$13,178	100	43	44	4	2185	N
\$13,178	100	47	44	4	2185	N
\$10,014	100	30	27	4	466	N
\$13,178	100	43	43	4	2185	N
\$13,178	100	43	43	4	2185	N
\$13,177	100	43	44	4	2185	N
\$13,178	100	43	44	4	1285	N
\$13,178	100	43	43	4	2185	N
\$13,178	100	43	43	4	2185	N
\$13,177	100	43	44	4	2185	N
\$13,177	100	47	44	4	2185	N
\$13,178	100	43	43	4	2185	N
\$11,548	100	39	40	2	0	N
\$13,177	100	43	44	4	2185	N
\$13,177	100	47	44	4	2185	N
\$13,177	100	47	44	4	2185	
\$13,178	100	47	44	4	2185	N
\$13,177	100	34	44	4	2185	N
\$13,177	100	43	44	4	2185	N
\$13,178	100	43	43	4	2186	N
\$14,888	100	43	44	4	475	N
\$14,888	100	47	44	4	475	N
\$13,178	100	43	44	4	1285	N
\$13,178	100	43	44	4	2185	
\$13,177	100	43	44	4	2185	N

s.22

\$13,178	100	43	44	4	2185 N
\$13,177	100	43	43	4	2185 N
\$12,545	100	43	43	4	2268
\$13,178	100	43	44	4	2185
\$13,178	100	47	43	4	2300 N
\$13,178	100	43	43	4	2185
\$13,178	100	47	44	4	2185 N
\$13,178	100	43	43	4	2185 N
\$13,178	100	43	44	4	2185
\$13,178	100	47	44	4	2185
\$13,178	100	43	44	4	2187 N
\$13,177	100	47	44	4	2185 N
\$13,177	100	47	44	4	2185 N
\$12,545	100	43	43	4	2268
\$13,177	100	47	44	4	2185 N
\$14,200	100	47	44	4	1900 N
\$13,178	100	47	43	4	2185 N
\$13,178	100	43	43	4	2185 N
\$13,178	100	43	44	4	2785 N
\$8,536	100	34	35	4	475 N
\$8,536	100	43	35	4	475 N
\$13,178	100	43	44	4	2185
\$13,178	100	43	43	4	2185 N
\$13,178	100	43	43	3	2185 N
\$13,178	100	47	43	3	2185 N
\$13,168	100	43	44	4	2185 N
\$13,178	100	47	44	4	2185 N

s.22

\$13,177	100	43	44	4	2185	N
\$13,177	100	43	44	4	2185	N
\$13,178	100	47	44	4	2185	N
\$13,177	100	43	44	4	2182	N

WAP8 - Early Childhood Education

s.22

\$13,350	100	47	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,974	100	43	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,350	100	43	43	4	1425	N
\$9,880	100	34	33	4	0	N
\$13,350	100	43	43	4	1485	N
\$13,350	100	43	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,350	100	43	43	4	1425	N
\$13,350	100	43	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,350	100	43	42	4	1425	N
\$13,350	60	43	43	4	1425	N
\$8,275	60	26	25	4	1475	Y
\$13,350	100	43	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,350	100	47	43	4	1425	N
\$13,350	100	43	42	4	1425	N
\$13,350	100	43	42	4	1425	N

**Reardon, Cora AVED:EX**

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**From:** Bennett, Mark AVED:EX  
**Sent:** Wednesday, October 15, 2014 12:06 PM  
**To:** 'chris.velasco@cdicollege.ca'  
**Cc:** 'sylvia.andre@cdicollege.ca'; Thorleifson, Ingrid AVED:EX  
**Subject:** Compliance review  
**Attachments:** CDI Victoria Notification letter.pdf

Good afternoon,

I am writing to advise you that StudentAid BC has scheduled a Compliance Review of your institution on Tuesday, October 21, 2014 at 8:30 am. Please acknowledge receipt of the attached document as it describes important information pertaining to our visit.

Please do not hesitate to contact me for further information.

We look forward to meeting with you,

**Mark Bennett | Compliance Officer**  
Post Secondary Audit and Accountability Branch  
Ministry of Advanced Education  
☎ (250) 387-7450

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**Reardon, Cora AVED:EX**

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**From:** Chris Velasco <Chris.Velasco@cdicollege.ca>  
**Sent:** Monday, December 22, 2014 9:52 AM  
**To:** Bennett, Mark AVED:EX  
**Cc:** Colleen Taylor  
**Subject:** RE: CDI Victoria SABC Compliance Review Response

Hello Mark,

I can confirm that refund cheques for s.22 were mailed out the afternoon of s.22

**From:** Bennett, Mark AVED:EX [<mailto:Mark.Bennett@gov.bc.ca>]  
**Sent:** December-19-14 11:22 AM  
**To:** Chris Velasco  
**Subject:** RE: CDI Victoria SABC Compliance Review Response

Good afternoon Chris,

Thank you for your email. Please consider this email as confirmation of receipt of your institution's response to the compliance report. The information you provided has been reviewed and we confirm that all but one of the requested action items has been met.

As your institution's accounting department has not yet processed the refund cheques, please provide written confirmation when this process is complete.

If you have any further questions, please do not hesitate to contact me.

Thank you,

Mark

**From:** Chris Velasco [<mailto:Chris.Velasco@cdicollege.ca>]  
**Sent:** Friday, December 19, 2014 10:39 AM  
**To:** Bennett, Mark AVED:EX  
**Subject:** CDI Victoria SABC Compliance Review Response

Hello Mark,

Please find our responses to the action items listed on our recent compliance review. If there are any questions regarding this, please let me know.

Chris

**Chris Velasco**  
*Director*

**T:** 250.886.6396 x2201  
**VoIP:** 609 2201

F: 250.978.1801

E: [chris.velasco@cdcollege.ca](mailto:chris.velasco@cdcollege.ca)

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