

# Standing Committee on Citizenship and Education

Report Written by Mary Louise Mc Neil May 8th, 2017

## INTRODUCTION

First, I would like to thank the Standing committee for allowing me to submit this report for consideration. I began the CSIC e-Academy Immigration Consultant Course in 2012. The following report is a summary of my experience and barriers encountered in an effort as a student to complete both the CSIC e-Academy program and the ICCRC exam. I will detail why an immigration program combined with the ICCRC exam that should have taken no more than 1.5 years to complete is taking me five years plus cost, and is still on-going.

## Employment and Educational Background

Previously employed as a Cape Breton Economic Development Specialist and initiated a 10-million-dollar project within the first three months. I was offered and accepted the Maritime Regional Director of Habitat for Humanity position and organized the building of the first Habitat home to be completed in 48 hours. Held a Foreign Expert Certificate provided by the People's Republic of China to teach at Fuzhou College in Fujian Province, Sunshine and Min Jiang University.

In Riyadh, Saudi Arabia I was employed to teach at Princess Nourah bint Abdulrahman University, an all-female university. Within a six-year period was responsible for teaching over 1,000 students, business executives, doctors and lawyers and lived a total of seven years in Asia and the Middle East. I obtained my BA degree from Acadia University Wolfville, Nova Scotia.

My motivation for applying to CSIC e-Academy is related to the several years' experience gathered during the time I worked and lived overseas. I greatly appreciated both the culture and people of all three countries. However, I did encounter some concerning circumstances.

In 2010 when employed with an Alberta, Calgary College, I arrived one morning to find myself along with other teachers and students locked out of the college. The students were mostly from South Korea. Coming to Canada was an expensive venture for the Korean students and their families. However, due to mismanagement and financial difficulties by the owners of the college, the doors were closed leaving the students devastated. The South Korean students found themselves in a foreign country, with little money and nowhere to turn. Throughout this ordeal, in an effort to help, I called the Alberta Department of Education and numerous other institutions to see who would hold the owners responsible. I was told it didn't fall under the Department of Education because it was run as a private business.

Most of the teachers, myself included, continued to teach without pay so the students could complete their courses and receive their certificates. The CBSA was informed about the situation and a few of us worked with CBSA to provide as much information as possible. As told by the CBSA investigator, the investigation resulted in the owners having their name put into a worldwide database which restricted them from recruiting students ever again. Although this was broadcasted in the South Korean news, there was no coverage of the story in Canada.

Previous to this, while in China I was offered \$60,000 Canadian dollars to marry a Chinese man to sponsor him into Canada. I was told the dollar amount increases as the age of the sponsor decreases, the suggested price for this was 80,000.00 Canadian dollars but open for negotiation. I experienced a similar opportunity in India. Both were declined.

While living in Fuzhou, Fujian province, I spoke with a Canadian man in his thirties who, without any hesitation said he was on his third paid arranged marriage to a Chinese woman. On another occasion found myself inadvertently in a smugglers (snakeheads) home just outside the City of Fuzhou in a gated community. A friend, took me to visit a family, the women was discussing her husband's business, providing widescale illegal entry to Australia, Canada and Japan. This information was passed on to the RCMP, Toronto Immigration Division.

These experiences impacted my desire to become an "Immigration Consultant" for two reasons. One, to assist students, families, refugees etc. in their efforts to come to Canada to work, study and/or become Canadian citizens. Two, provide and maintain transparency and identify red flags, if any, when working with clients.

#### [CSIC e-Academy:](#)

In 2012, CSIC e-Academy was the only immigration consulting program available in Calgary, Alberta, so I signed up. I found the quality and content of the on-line program interesting and appreciated the numerous instructors who taught the different courses. The assignments could be very intense, especially the, "Economics class" portion of the program. The instructor was kind, patient and had a genuine concern for the students which was pretty much par for all the instructors. I passed all the courses and received my certificate in the mail.

However, I found my experience with the CSIC e-Academy administration and technical support division to be quite the opposite during this time. If I encountered just a few problems it would rise to the level of frustration and I would get on with it, but as the time passed I began to see consistent problems. For example, while taking one course I had to return to Nova Scotia because of a family emergency. Prior to my departure, I received an e-mail from technical support saying they were making changes to their website. When I arrived in N.S. I continued to complete all my assignments and just before the exam I flew back to Calgary on a Saturday in time for the exam the next day.

Sunday morning when I signed in to take the on-line exam, I noted the start time was 11:00, instead of the usual 11:00 EST. I considered this to be part of the changes to the website. Since Calgary is a two-hour difference from central Canada, I re-opened the site at 1:00 p.m. and found the exam was over. I called technical support several times to ask why this was the case. Finally, after three days of trying I connected with him but was told I couldn't have access to the exam. This is also confirmed in an e-mail by Senior Education administration.

In the meantime, the instructor of the course contacted the administration to recommend that it was not necessary for me to write the exam, she said I had a full comprehension of the material and passed all assignments. Even during a time of stress, I still completed all the course work. I also received a confidential e-mail from someone with CSIC saying after my call to technical support, the time was changed and corrected for every other class except mine. Yet, administration refused to take responsibility. I have a copy of this e-mail.

Knowing they corrected the time for other classes I forwarded another e-mail to administration asking if they could tell me they didn't correct the time for every other class then I will pay the invoice to re-do the course, no questions asked. The response was essentially, pay the invoice. An invoice for the full price of the course was sent to me.

This meant I was to re-do all the assignments, the same assignments I just finished and passed, and complete the exam. A reasonable approach could have been for CSIC administration to accept responsibility for the mistake and/or have me only write the exam with a new class and charge me accordingly. This would allow me to move on to other courses.

Beyond all of what happened around the exam the most striking was the lack of compassion or empathy that I had just suffered a loss in my family. There was no, "I'm sorry for your loss but these are the circumstances" or "I understand this must be a stressful time but," from administration. This is considered at the very least a basic courtesy in a professional environment.

#### [Preparing for the ICCRC Exam 1: The IELTS Test](#)

Once the CSIC e-academy program was completed, it was time to prepare for the ICCRC exam. I received the 24 page ICCRC exam preparation and requirement information in the mail. One such requirement was, before writing the exam I was to take an "International English Language Testing System" test known as the IELTS exam, no exceptions.

ICCRC was clear, they didn't just require students where English was not their first language to write the IELTS exam but it was mandated that Canadian students, born in Canada, with a university degree from a Canadian university who want to write the ICCRC exam must take the IELTS exam.

The IELTS test is designed to assess the language ability of non-native speakers of English who intend to study or work where English is the language of communication. ICCRCs' rationale may be, even Canadians will find litigation in the tribunals challenging therefore English Canadians should be examined. The counter argument to this is, before we take the exam we have already passed the Immigration Consulting courses which includes complex case studies. The ICCRC is testing us on the very same course material we've already covered and passed thereby proving we can deal with real world cases.

I phoned the ICCRC office to talk about the IELTS test, the employee told me they didn't like to discriminate against those with English as a second language, so I must take the test. I then sent a letter to the ICCRC Board indicating there was no value-added by taking this test. However, the letter didn't reach the board. Management responded by saying they will be expecting me to write an IELTS test.

On the face of it most would think, what's the problem? It's an English exam, how hard can it be for Canadian English speakers. Yet, some foreigners can take upwards of several years before passing the IELTS test and some never pass. For international students and those hoping to work in Canada, failing an IELTS test will affect their ability to go abroad to study and/or work. The study preparation can be intense.

As publicly confirmed by, Honorable Ahmed D. Hussen, MP for Immigration, Refugees and Citizenship, when he acknowledged, English testing is not only difficult for immigrants but English Canadians as well. For Canadians, it is not about English comprehension. It's about the time needed to practice the

structure of the test. This means, English Canadians with university degrees do not come away having learned more English, just how to identify and practice the structure of the test.

When you read the description of the IELTS below you will understand why. Most foreigners sign up for IELTS preparation courses on how to successfully practice and maneuver through the tests to be accepted into university or its used as a prerequisite for job before entering Canada.

Considering all arguments against Canadian degree graduates taking the IELTS test, the most important point is, everything must come to a halt to prepare for IELTS. This results in long delays before writing the ICCRC exam since it is only offered every three months. For me circumstances changed, I was working twelve hour days outside of Calgary for a total of six months of the year. Setting a schedule to match the times of the exam became a challenge. I was discouraged, this resulted in a long gap before continuing my pursuit to become an Immigration Consultant.

Misinformation could have been avoided if the CSIC website, marketed and sold their program as a two-part program. Part one, explicit information on the courses and course descriptions including and highlighting the required documents and IELTS test they will have to submit to ICCRC before the exam. Part two, the ICCRC 24-page documents sent to students as per usual. This provides full disclosure. I believe CSIC downplayed the ICCRC requirements so as not to deter new students from signing up.

If you check out the CSIC website you'll see they mention the ICCRC, but if you go to the link, it doesn't work. How are students to know about the ICCRC in relation to the CSIC. It not good enough to simply mention ICCRC. Even if part of the CSIC course provides course content in one of their courses. It doesn't provide a list of the document and test requirement in the content. There is no indication that we are going to receive a 24-page document, advising us on how and what to prepare for the exam. It is only right to provide transparent information on the entire expectation of the two-part program on the CSIC website.

A student requires all the necessary information to succeed. If this industry is new to them, how will they know how CSIC is connected to ICCRC beyond what is provided in the course material. They may think when your finished the CSIC courses, you're done. They will not know they are receiving a 24-page document showing all the requirements necessary before writing the exam. Had I have known the full scope of the two-part program, I would have prepared differently, avoiding the loss of time, money and frustration. Unless you have a friend or relative or someone you know working in the industry, the information on the CSIC is simply not clear enough. When most Canadians read the part where students must take an IELTS test, they will not connect that it refers to them. Why should they? University students see IELTS information posted all the time, they know it's not related to them. Canadian universities do not expect their Canadian students to write an IELTS exam. Does this deem Canadians as entitled? No, it's just common sense. What is it that an IELTS test reveals about a Canadian's standard of English that a university degree doesn't?

### A Description of the IELTS Test:

The IELTS website identifies two types of testing, General and Academic. ICCRC requires the student to take the Academic test. There are four sections, reading, writing, listening and speaking. The speaking test may be held before or after the IELTS test, at times a different date altogether. The ICCRC requires the Academic pass mark to be 6.5 for each section. The test is 2.45 hours long with no break.

The recordings are heard only once. They include a range of accents including British, Australian, New Zealand, American and Canadian. There are 40 questions for the listening section. Each question is worth one point. You lose one point for misspelled words.

### **Test Format for Academic Listening: 30 minutes.**

A variety of question types are used, chosen from the following: multiple choice, matching, plan/map/diagram labelling, form/note/table/flow-chart/summary completions, sentence completion.

You listen to four recordings of native English speakers and write your answers to a series of questions.

Recording 1-a conversation between two people set in an everyday social context

Recording 2- a monologue set in an everyday social context, e.g. a speech about local facilities.

Recording 3- a conversation between up to four people set in an educational or training context, e.g. a university tutor or student discussing an assignment

Recording 4-a monologue on an academic subject, e.g., a university lecture

Examiners will be looking for evidence of ability to understand the main ideas and detailed factual information, the opinions and attitudes of speakers, the purpose of an utterance and evidence of ability to follow the development of ideas.

### **Test Format for Academic Reading: 60 minutes**

The Reading component is 60 minutes and consists of 40 questions, designed to test a wide range of reading skills. These include reading for gist and main ideas, reading for detail, skimming, understanding logical arguments and recognizing writer's opinions, attitudes and purpose.

The Academic test includes three long texts which range from the descriptive and factual to the discursive and analytical. These are taken from books, journals, magazines and newspapers. They have been selected for a non-specialist audience but are appropriate for people entering university courses or seeking professional registration.

### **Test Format for Academic Writing: 60 minutes**

Includes three long texts which range from the descriptive and factual to the discursive and analytical. These are taken from books, journals, magazines and newspapers. They have been selected for a non-specialist audience but are appropriate for people entering university courses or seeking professional registration.

Task 1- a student will be presented with a graph, table, chart or diagram and asked to describe, summarize or explain the information in their own words. They may be asked to describe and explain data, describe the stages of a process, how something works or describe an object or event.

Task 2- you will be asked to write an essay in response to a point of view, argument or problem. Response to both tasks must be in a formal style.

If the student writes too much or too little they will be penalized.

**Academic Test Format for Speaking: 11-14 minutes:**

Part 1 – the examiner will ask general questions and a range of familiar topics, such as home, family, work, studies and interests. This part lasts four or five minutes.

Part 2– the student is given a card which asks them to talk about a particular topic. They have one minute to prepare before speaking for up to two minutes. The examiner will then ask one or two questions on the same topic.

When students arrive to take the IELTS test they must present a valid passport, next the student is photographed and finger scanned. Before entering the classroom, they present their passport once again. During the test, students are asked no less than five times to show their passport, knowing no one has left the room since they entered the first time. It is also common to take a speaking test by an examiner where English is not their first language. The cost of the test is \$300.00 Canadian dollars not including the cost of IELTS test preparation courses for those who sign up.

[\(Back to CSIC\) CSIC e-Academy's Modified Courses:](#)

In 2014, I prepared and passed the IELTS test, which was valid for two years. I then requested a CSIC e-Academy updated transcript offered to CSIC students for up to three years of receiving the Immigration Consultant Certificate and required by ICCRC. I was informed by administration, before getting an updated transcript I must take modified courses.

Modified courses were not previously outlined in the 2012 policies as part of the understanding of receiving an updated transcript. Yet, I was sent an, "Addendum to Student Contract." I, (fill in name), as a CSIC graduate seeking to update my transcript have *opted* to take the following modified program of study, signed October 30<sup>th</sup>, 2015. To be clear, I did not opt to take the courses, I had to take the courses so I could have access to write the ICCRC exam. I was then required to take three full courses and an Exam preparation course. The courses were 750.00 per course and the exam preparation another 500.00 added expense.

A modified course or refresher course (as described on the phone) is generally understood to be a shorter version of the original course. However, these modified courses contained the exact same course material I completed in 2012 with a few minor changes and required to pay full price for all the courses. Not only was the course material the same as the 2012 course, the assignments were also the exact same, the exam questions were identical to previous years. The instructor's formulated response to our assignments also the same and unchanged.

Essentially, 97% of the total course content for all the courses were identical to the original courses. This 3% difference could have easily been put into a small booklet and sold to the students. Given the choice,

an exam could have been provided based on the material we already had resulting in receiving an updated transcript. If students decided they wanted to take the course again, it should be their choice.

After signing the "Addendum to Student Contract" and submitting all required documents along with full payment I sent a follow-up e-mail asking administration to confirm receipt of those documents and asked if administration would be available in case there was a problem with either the documents and accessing the economic course. I was trying to avoid any problems I experienced previously with the Senior Education Administrator." She said she would be available. This is important because once the agreement was signed and the payment was sent it meant I could begin the course immediately. This would give me enough time to complete two assignments before I had to work out of the city and back again. My schedule could remain on track and I would be able to complete my assignments.

However, she was not available to respond to the follow-up e-mails asking if everything was to their satisfaction. After several days passed she requested one document re-sent in another format even though the format I sent it in was a recommended format. Since I returned to work, I sent the document they requested once again and by this time several days passed where I was unable to access course material leaving little time to do the assignments. This meant I did not have the same access time to the course material as other students and less time compared to other students to complete my assignments. When I did get access to the course, it was only then did I realized I was re-taking the full Economics Class course, once again.

The time left for me to work on the assignment was now very limited before it had to be submitted. This affected the overall course mark by a few points and had to pay another \$750.00 to re-do the Economics course, which I did. I realized at this point it was going to be more of the same experience I had in the past with the administration's. For the first time, I spoke to the instructor of the Economics Class about my experience, she was disappointed and supportive saying it was not the experience she wanted for students and would pass it on to management.

Providing the same course content over several years, the same assignments and the same exams opens CSIC e-Academy to the increasing possibility of abuse of the program. How easy is it to pass on completed assignments and exam questions and answers to individuals applying to CSIC e-Academy to achieve an Immigration Consultants certificate? This surely creates an unlevel playing field. Apply this same scenario to any high school, college or university, what do you think the result would be? With respect, I do not believe due diligence is being carried out.

The last course was the Refugee course. I had to re-do this course three times. The first time, I was told the exam forms were empty when uploaded, I had to re-do the exam and pay another 750.00. The second time, I asked technical support to let me know if the information uploaded properly. He wrote that he didn't provide that service. When graded, they said there was not enough information, another 750.00 dollars. The third time, I paid another 750.00 and passed. Keep in mind, I already passed this same exam in 2012. I would have kept paying out of sheer interest to see just how far they were willing to take this. I became more intrigued with this very strange business practices than finishing the courses.

At this point I'm hoping the question the standing committee is asking is how does a student go from passing all the courses in 2012 and capable of uploading forms and assignments to having to re-do the economics course twice and the refugee class three times in 2015, especially when you consider, it was all the same material. And how does a technical support person, not provide technical support especially

when most needed, during an exam. Why was there no effort in communicating there was a problem with the empty form that was uploaded? Why didn't anyone let me know there was a problem on that end. The only time I found out was when they posted the marks. Absolutely no effort was made in trying to communicate with me. Why? Was it because I wasn't part of a formulated response?

#### [Preparing for the ICCRC Exam 2: The International Background Check](#)

I submitted the CSIC e-Academy updated transcript along with the IELTS test results, academic transcripts and completed copy of passport to the ICCRC records-document department and all other necessary documents to be submitted before writing the exam. For example, students must submit completed criminal background checks for every country lived in over six months. For me, this was China and Saudi Arabia. If I lived in China for six months or more I was directed to a CIC website for Chinese permanent residents seeking criminal background checks, this also applied to Canadians who lived in China for more than six months and now living outside of China. The information on the webpage explained, if I was a Canadian living outside of China, who once lived and/or worked in China for six months or more, and required a criminal background check, I needed a Notarial Certificate of No Criminal Conviction completed. It was recommended that I send my passport information along with other documents to family or friends in China, they in turn will go to the local police station, fill out the form, have the background check performed and sent back to Canada.

Since it has been seven years since I've lived in China, I no longer had close contacts and only a few acquaintances. In my effort to resolve this problem, I found a company called "CSI" (yes, it's real) approved by the RCMP to complete international criminal background checks for corporations and individuals. They provided a criminal search using the same database Chinese police officers use in China. CSI said it was name based. I paid the fee of 500.00 dollars and they provided the service. CSI sent the results to me and I submitted this to the ICCRC records-documents department. The person in the records-documents responded in an e-mail saying the document was unacceptable and recommended I follow the instructions provided in the ICCRC guidelines about sending my documents to family or friends in China. I had no choice but to re-schedule the exam.

I requested a copy of the Notarial Certificate from ICCRC to understand the requirements I was expected to fulfil, and was referred to the internet. I proceeded to the internet and found a scanned unreadable document an individual posted that could not be downloaded. The certificate did not resemble the multi-page document written in English and Chinese that the records- documents department described. I called several Chinese notary publics and Chinese lawyers in Canada, they didn't have any information of Notarial Certificates. One Chinese lawyer from Toronto referred me to an International Law firm in China. I sent an e-mail describing the type of service I needed but didn't receive a response. I spoke to employees at the Chinese Consulant in Calgary to see if they had any information, they did not.

After two to three weeks of searching for a copy of a Notarial Certificate in Canada and China, I located a Chinese citizen who lived in Fuzhou, Fujian Province. His English name is Simpson (many Chinese citizens like to take on an english name when communicating with westerners) and I hired him to be my representative. I will forward 28 pages (when printed) of the on-going dialogue carried out throughout the weeks in his effort to retrieve a copy of the Notarial Certificate from the police station in the hope of finding out the requirements, fill out the document and have the background check completed so I could write the exam.

I had no doubt about Simpson's effort to see this through. When reading the e-mails please note when Simpson writes about a lawyer who said he could provide the service in an "unusual way for a very high price." I will also forward e-mails between myself and former student who also tried calling the police station in Fuzhou from another city, but couldn't get through. The e-mail from Guangzhou Consultant saying I need the notarial document before anyone can help me.

You will also see in the e-mails exchange with ICCRC records-documents that instead of being concerned about a lawyer offering to provide a document in an unusual way for a very high price, they were more concerned with why I didn't follow the recommended procedure offered on the CIC permanent resident webpage and instead went to a Canadian business approved by the RCMP.

Since then I've had to cancel writing the ICCRC exam twice because I couldn't provide the only document left to submit from China for the exam. Just recently I was told that if I couldn't provide the Notarial Certificate then provide a refusal letter from the police station. I received an e-mail from Simpson this morning saying the police refuse to provide a refusal letter. This is as far as I can go, I've done all I can do to in my effort fulfill the requirements to write the exam. ICCRC were wondering why others could provide the completed Notarial Certificate from China and I couldn't. The inference here is that I am somehow trying to circumvent the process. If so, why would I pay 500.00 dollars to get a background check done by a Canadian business which is held to accountability and transparency.

After living in China, I believe I can speak with some authority on the risk one takes when requesting a sensitive service or sending valued documents like passport information to China. As expressed to the document-records department neither the Chinese government, Chinese police nor the Chinese citizens would recommend sending this information to those other than trusted friends or family.

#### Closing Remarks:

It has been a long road to travel with CSIC e-Academy and to a lesser extent ICCRC. I've invested a lot of time, money, and effort in my desire to be certified. I could not have imagined by signing up for an Immigration Consultant program in 2012 I would still be striving to write an exam in 2017, such a disappointment. I believe if I had gone to class in a university or college it would have been a much more positive experience with strong support given to students. I also believe I would be self-employed now, running a small-business providing an honest service to refugees, international students, husbands sponsoring their wives.

However, the reality is, I'm questioned by ICCRC about not following a process that didn't work for me and providing a secure alternative having a background check completed by a company that is supported by RCMP. If I ever do get to write the exam, the required ICCRC documents must now be renewed. For example, police back-ground checks, fingerprinting, and IELTS exams along with notarizing other documents.

I hope the information I've provided will be considered when examining the quality of education provided to students in their quest to become an Immigration Consultant. I highly recommend CSIC e-Academy market their program as a two-part program. Fully explain to students about the IELTS exam and recommend this be completed before beginning the courses, to avoid any disruption in studies when transitioning from the CSIC course to the ICCRC exam. Also, provide a definition of modified courses and the cost associated with it.

I would also recommend ICCRC not send students to a CIC permanent resident website to find the instructions on how to obtain a notarial certificate, but take the time to write clear instructions on the process of obtaining a Notarial Certificate of No Criminal Conviction on their website.

I would also recommend taking a closer look at why technical support services would not reach out and try to assist students when they encounter technical problems and provide an alternative of scanning, faxing or as part of an e-mail attachment in the case of uploading forms, instead of having them re-do and pay for the entire course again and again.

In closing, I would also recommend that we have more faith in our own Canadian institutions like the RCMP when endorsing a Canadian business to providing an international background service. ICCRC should be questioned on why they think Canadians should be placed in an uneasy situation by relying on a foreign system they are not familiar with and have little access. By sending valued documents like passports to individuals they may not know, exposing them to offers of “providing an unusual service for a very high price” to appease ICCRC requirements when we have a legitimate process available here in Canada.

Thank you for taking the time to read this document.

Respectfully,

Mary Louise McNeil