Briefing Note

Memorial University of Newfoundland
Submission to CIMM (Standing Committee on Citizenship and Immigration)
House of Commons
Visa Refusal Rates for International Students
February 28, 2022

Objectives
The purpose of this briefing note is to:

- Communicate the impact of high refusal rates of initial study permit applications given the significance of international students to our provincial economy, labour market, community, and population growth strategy.
- Address the impact of high refusal rates, procedural mistakes, and delays in application processing on the EduCanada brand.
- State the impact on institutional enrollment numbers and challenges in recruiting high caliber graduate researchers.
- Discuss how Memorial can partner with Universities Canada and the federal government to ensure our prospective students are successful in obtaining a study permit.

Background
Memorial University of Newfoundland is the only university in the province of Newfoundland and Labrador. As such, it is a significant contributor to the province’s knowledge economy. As a province that has challenges related to an aging population and meeting its labour market needs, Newfoundland and Labrador relies on immigration to address these issues. The province has identified international students as a key component of this strategy. When international students face challenges in their initial journey to Canada (unclear study permit requirements, long processing times, refusals) it reflects poorly on our reputation as a world class destination of choice, and means fewer than the desired number of students are successful in arriving. It also creates frustration for students when they may be refused on “dual intent” as these messages are in conflict with the provincial immigration strategy. Memorial University and the province have the capacity and desire to welcome and integrate more students into our communities.

As our applicant numbers increase and we expand program offerings that are attractive in the international marketplace, Memorial University has noticed an increasing number of applicants and students facing challenges related to being successful in their study permit applications. Indicators that speak to an increase in refusal rates include undergraduate survey data, admission deferral data, students support staff observations and faculty observations – all of which are outlined below.

These observations demonstrate some Key Messages:
- Students are not receiving study permit decisions in a timely manner.
  - SDS (Student Direct Stream) applications are not being consistently expedited and result in students missing out on program start-dates and deferring to later semesters.
  - Access to giving biometrics is a significant barrier for students from certain conflict regions which impacts access to the International Student Program and increases refusal rates.
● Students and faculties are unclear around the reasons for refusal.
  ○ Students from Afghanistan have faced unique challenges such as refusals related to establishing ties to their home country, as well as significantly longer delays in processing. These challenges have been greatly exacerbated by the current political crisis. Students experienced challenges with finding information within Afghan special measures that can facilitate their applications as temporary residents.
● Students lack information about study permit requirements.
  ○ This creates unnecessary refusals and fear among students. Fear exists particularly around submitting applications for accompanying family members and the type of documents (such as study plans) that will result in higher refusal rates.
● Faculties have observed a disproportionate number of refusals for applicants from Nigeria and Ghana.

Students, staff and faculty have had to navigate delays in processing and refusals while institutions continue to try to ensure that students can start their classes on time. The continuing changing nature of the pandemic and the unique circumstances in each region around the world has meant that some students have had their documents under process for significantly longer than the advertised processing times. Institutions struggle to support high caliber students who face extreme delays and refusals. There exists a gap in communication between the institutions, trade commissioners and IRCC. Memorial University invests resources on student recruitment such as staffing, travel, and events. The efforts will go wasted when there are high study permit refusal rates. Institutions, government, the Edu Canada brand and students will benefit from a collaborative approach where we work together to ensure the study permit applications follow the guidelines/protocols.

**Undergraduate Applicant Data, Survey and Deferral Requests**
Memorial University has seen an increase in international applicants and has experienced growth in emerging/non-traditional source countries. Top source countries for Memorial are Bangladesh, India, China, Nigeria, Iran, Egypt, and Ghana. Over the past several years, numbers from China have experienced a decline, while numbers from African countries have increased.

In a survey conducted of undergraduate applicants in 2021, 2020 and 2018, applicants were asked what the main reason was they had chosen not to attend Memorial University. The answer to this question in 2020 and 2018 did not significantly indicate visa issues as a reason. Whereas in 2021 about 40% of respondents who answered this question indicated the inability to secure a student visa as the reason for not attending Memorial. When asked if there is anything that Memorial University could have done or can do to help guarantee a student’s attendance, the majority of respondents indicated ‘no’. Of those that did indicate ‘yes’, 37% referred to assistance in securing a student visa.

The number of deferral requests are another telling sign that visa refusals are affecting international students’ ability to come to Canada and begin their studies. While deferral requests do not speak to visa refusals specifically, as there are often many other reasons why one would request a deferral (pandemic-related visa processing delays, travel restrictions, preference for in-person vs. remote/online learning, etc.), it is highly likely that visa refusals have played a role here. Deferral requests have increased 100% since 2018 with an average increase of 26% per year since 2018.

**Faculty and Campus Specific Observations**
Memorial’s Faculty of Education has experienced steady growth (about 4.5% a year) in international student applications and admissions to graduate programs over the past three years. The faculty has
also noticed that study permit refusals and approval delays have been an on-going issue. Students applying for their documents have been greatly impacted by these delays. The faculty has tried to alleviate this problem by moving admission decisions forward to February 1 for the Fall semester. This allows students six months to secure a study permit, but still the issue has persisted. Through student interactions, the faculty has observed that some regions such as Nigeria and Afghanistan had a real-time study permit processing time of nearly 30+ weeks at the height of the pandemic - a number that far exceeded the advertised processing time of 13 weeks on the IRCC website.

Memorial’s Faculty of Engineering and Applied Science has noted that its applicants from the African region have received proportionately higher refusals than other regions in the world since the year 2020. The faculty has noted that, at times, refusals were either unreasonable or unfounded. One recurring example of this was with students who were fully sponsored by the faculty and were refused because of lack of proof of funds, even though their sponsorships would cover most, if not all, the students’ costs in Canada. Another issue of concern pertaining to refusals for students in this group related to lack of proof of ties to their home country which resulted in other students being further disadvantaged.

Students in the Faculty of Science who are admitted into the Bachelor of Science program have also faced challenges with their study permit applications. In some cases visa offices have refused applications for admission into this program based on the availability of similar programs in their home country or the opportunity for BSc. graduates to find relevant work in their home countries. Some students are often prompted to include more detailed study plans explaining why they are choosing to take this program at great expense overseas, versus completing the degree in their home countries.

While active reporting on student refusals is low at the Grenfell campus, it appears that students from Pakistan, Bangladesh, and Nigeria are most affected. Advising staff have noticed, albeit anecdotally, that students from this region tend to face longer wait times and refusals. Staff have noted that students have mentioned the desire to apply quite early to ensure that they are not affected by the processing delays. This is particularly the case in Bangladesh and Nigeria. For example, students admitted for a May semester start are more likely to request a deferment as their documents are not processed in time.

Similarly, at the Marine Institute (MI), staff have noted high refusal rates among their Nigerian applicants. The majority of international students at MI are admitted to one-year advanced diploma programs. Faculty and staff often do not know how many students will join until classes begin. This is attributed to long processing times and refusals of study permit applications. As a result, a high numbers of applicants defer their applications. This uncertainty impacts MI: as a smaller campus, not knowing the number of students to expect can create significant challenges in resourcing faculty, staff and space. MI experiences great international interest in its graduate diploma/master’s programs. While international admissions rates are high, the numbers of students arrived were low in comparison. While there are likely many reasons (including COVID), the main issue appears to be study permit related.