

CBIE – Questions to IRCC
Submitted: May 8, 2025

1. Translation

We would like to highlight that the French version of the April 2023 PDI updates contains multiple translation errors leading to misguided and wrong information for francophone students. Several sections indicate "work permit" instead of "study permit", and in some cases, complete sentences appear in English (see example below).

Permis d'études : Évaluation des conditions liées à un permis d'études

Les présentes IEP fournissent des directives relatives au traitement pour l'évaluation des conditions liées à un permis d'études. Cela comprend notamment la prolongation des permis d'études, le retour des titulaires de permis d'études au Canada et les enquêtes sur la conformité des permis d'études.

*Conformément au paragraphe 220.1(1) du Règlement sur l'immigration et la protection des réfugiés (RIPR), le titulaire d'un permis d'études au Canada est assujetti aux **deux** conditions suivantes :*

They shall enroll at a designated learning institution (DLI) that is named in their permit and remain enrolled at a DLI until they complete their studies.

They shall actively pursue their course or program of study.

IRCC's response: We appreciate you bringing this to our attention. A review of our program delivery instructions (PDIs) is underway to identify and correct all French translation errors. These instructions will be updated as soon as possible.

2. Questions

Question	Response
1. Can IRCC confirm that in the context of R217.1, R220.1(1)(a) and R222(1)(a.1), the wording "names a designated learning institution" and "named in the permit" means "printed on the study permit", and that students who do not have a specific DLI name printed on their physical study permits would not be subject to these provisions of IRPR?	<p>The IRPR regulations were not replaced, but rather strengthened in 2024, therefore students with study permits issued before November 1, 2024, must continue to adhere to the conditions in place at the time their study permit was issued.</p> <p>If a student changes their DLI after November 1, 2024, IRCC policy requires them to apply for a new study permit and have it approved before starting at the new DLI,</p>

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	unless they meet specific exceptions outlined in the regulations. Their new study permit will explicitly state the name of the DLI they are attending, per the 2024 regulation changes.
2. When will IRCC provide clear guidance on the interpretation of R222(1)(a.1), and in which scenarios a student's study permit is invalidated by the operation of this provision? This is not addressed in the updated program delivery instructions issued on April 23. Does the invalidity of a study permit automatically equate to loss of temporary resident status in Canada?	A change in the validity of a study permit does not <i>automatically</i> mean loss of temporary resident status, for example if the student is on authorized leave. Study permits continue to be valid so long as students are adhering to the conditions associated with their permit.
3. Are students whose study permits are invalidated by operation of R222(1)(a.1) eligible to restore their status, or are they non-restorable under R182(2) due to non-compliance with R220.1(1)(a) which requires them to remain enrolled at the DLI named in their permit?	After changing their status to visitor or worker, students may resume their studies, using their previous study permit, as long as the study permit is valid and they remain enrolled at their DLI. If however the student ceased to be enrolled at their DLI pursuant to the new R222(1)(a.1) and the study permit was invalidated, then they would not be able to resume their studies.
<p>4. Given that IRCC processing times can be lengthy, are there any plans to extend the current grace period allowing students who are changing institutions to start (or continue) their studies at their new DLI past May 1? Can the policy clarification be made permanent, allowing those who do not have a specific DLI name printed on their study permit to begin studies at the new DLI, provided they have applied for a study permit extension for their new institution?</p> <p>The updated program delivery instructions (Study permits: Designated learning institutions) state:</p> <p>“Post-secondary study permits issued prior to November 08, 2024, and applicants exempted from LOA requirements under R219(2), will not have the DLI name printed on the permit. These study permit holders are encouraged to apply for a new study permit when changing DLIs to ensure accuracy in student compliance reporting.”</p> <p>Can IRCC confirm our interpretation that study permit holders whose permits do not have the DLI name printed are</p>	<p>This transitional measure introduced in January 2025 was time-limited and not permanent. Most students changing DLIs after May 1, 2025, need to wait for approval of their new study permit before starting at the new institution.</p> <p>We will review our guidelines published online, removing the wording ‘are encouraged’ and replacing it with ‘are required’, to ensure the policy requirement is clearer.</p>

Question	Response
<p>encouraged but not required to apply for a new study permit to change institutions? If so, when will the public-facing IRCC website be updated to reflect this?</p>	
<p>5. Spouses of students in Master's (MBA) programs are receiving refusals from IRCC on the basis that the student's study permit is not valid for more than 16 months. As per our understanding, a student's master's degree program must be 16 months or longer for their spouse to be eligible for a work permit. There is no indication anywhere on the IRCC website or in the <u>operational manuals</u> to suggest that the study permit itself must be valid for at least 16 months.</p> <p>It is our understanding that a foreign worker's work permit must be valid for at least 16 months for their spouse to receive a spousal open work permit. Can IRCC confirm if a master's student's study permit also needs to be valid for at least 16 months for the spouse to be eligible, or are IRCC officers potentially confusing both policies?</p> <p>Is there any update to IRCC's policy, or is this a matter of inconsistent implementation by processing officers? If no further policy change has occurred, is additional training or clarification being provided to ensure consistency in decision-making?</p>	<p>As of January 21st, 2025, open work permits are limited to spouses of international students who are studying in a Master's program of 16 months or longer, a doctoral degree program, certain professional programs at a university (as listed on our website), and select qualified programs identified in the list on our website.</p> <p>The study permit holder is required to be in a Master's program of at least 16 months or longer for their spouse to be eligible to receive an open work permit, and the proof of the Master's program must clearly indicate the duration of the program. There are instances where the study permit may be issued for less than the duration of the program (e.g., if the foreign national's passport is expiring in less than 16 months). If eligible for a spousal open work permit, the spouse will be issued a work permit that matches the duration of the study permit holder and would then be required to apply for an extension as per the instructions listed here.</p> <p>No further policy changes have occurred since January 2025, however, IRCC continues to monitor implementation and provide guidance to officers to support consistent decision making.</p>
<p>6. The updated program delivery instructions for PAL/TAL include contradictory information as to whether a PAL is required for a student who is restoring their status. This includes what we believe to be a misinterpretation of R215(1)(b), which does not refer to study permit holders but instead to foreign nationals who are exempt from a study permit under A30(2) as minor children or R188(1)(a) as family or household staff members of accredited foreign representatives, and are applying for a study permit from within Canada in the 90 days before or after their authorization to study ends. Can IRCC clarify if students will</p>	<p>A PAL/TAL is required for a foreign national who is restoring their status and applying for a study permit extension (e.g., a study permit holder whose study permit becomes invalid as it has expired) and who applies for a restoration of status and new study permit within 90 days after the date of losing status, irrespective of whether they are changing DLIs or level of study.</p> <p>A PAL/TAL is not required for foreign nationals who were previously authorized to study without a study permit, such as minor children and family or household staff members of accredited foreign representatives, and who are applying for a study permit, provided that they would continue to study at the same DLI in the same level</p>

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require a PAL to restore their status, if they are not changing institution or level of study?	of study as during their prior study authorization, and if they apply within 90 days before or after their study authorization ends.
7. The online document checklist for in-Canada TRV applicants who are study permit holders currently requires applicants to upload either a PAL/TAL, or proof of exemption. Given that a PAL is not required for a TRV application, can IRCC confirm that this is a known error in the online system and will be corrected? In the meantime, what does IRCC suggest applicants do in this situation?	Study or work permit holders applying for a TRV from within Canada are not required to provide a PAL/TAL or proof of exemption. However, a system error may be prompting some applicants within the IRCC Secure Account to include these documents. We are working to correct this system issue. In the interim, applicants that are erroneously prompted are advised to upload proof of exemption (if available) or a letter of explanation.
8. We are receiving reports that study permit applications are being returned due to PAL expiry, despite being submitted before the PAL expiry date. What recourse exists in these cases, and are processing officers using consistent date benchmarks when evaluating PAL validity?	A PAL/TAL must be valid at the time of application receipt and officers must not accept an application for processing if the expiration date has passed. Of note, PAL/TALs issued in 2024 have all since expired. If an applicant believes that their application was closed in error, the applicant may request a reconsideration through the IRCC Webform, accompanied by supporting documentation and a clear explanation of the request.
9. Processing timelines for study permit extensions vs. study permits (in-Canada): The IRCC website currently lists very different processing times for “study permit extensions” (220 days) and “study permits (from inside Canada)” (4 weeks). Can IRCC clarify whether the 220-day timeframe only applies to students who are not changing DLIs? If so, what timeline applies to students changing programs, institutions, or moving between levels (e.g., high school to post-secondary)? This has become an urgent issue: the largest current cohort of international students in many PSE institutions includes students already in Canada — particularly those coming from Canadian high schools, EAP programs, or other domestic institutions. If they are subject to a 220-day processing window, they risk being unable to transition in time, even if already legally present. This could have a devastating impact on enrolment this fall and should be clarified immediately.	The processing times published online pertain to study permit extensions (which includes the applications made by minors transferring to a post-secondary DLI). Current processing times start the day IRCC receives a complete application and ends when IRCC makes a final decision. Processing times are backwards-looking and provide an indication of the average time it took to process 80% of applications in the last 8 weeks. However, this may not be an accurate reflection for applications currently being processed. For example, the majority of new study permit extensions are being processed within service standards (120 days) despite the current processing time posted on the Departments website. The department is actively exploring changes to the way processing times are reflected on our website to better communicate current timelines.
10. Multiple members have reported that students’ study permit applications are being withdrawn because, according to IRCC,	In cases where a DLI identifies a potential issue with the LOA verification, the DLI should send an email to IRCC.LOAPortal-PortailLA.IRCC@cic.gc.ca as soon as

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<p>they sent a request for LOA verification but did not receive a response from the DLI by the deadline. However, in these cases, the institutions were able to confirm that either they did not receive a verification request, or they had completed the verification activity. These situations are often resulting in loss of status for students, requiring them to discontinue studies and work. This impacts students' academic progress, and their ability to support themselves in Canada.</p> <p>O What mechanisms exist for institutions and students to resolve these situations quickly?</p> <p>O Some institutions have also reported that these applications have been refused, rather than returned as per IRCC guidelines. Can IRCC confirm the steps students and DLIs should take to resolve these erroneous refusals?</p> <p>O Can IRCC elaborate on the steps it is taking to address the ongoing technical issues with the LOA verification process, and issues with manual verification requests (which are often sent to incorrect contacts within the DLI)?</p> <p>O Institutions are receiving reports that study permits are being refused on the basis of using the terminology, Letter of Admission instead of Letter of Acceptance. Is there formal guidance on whether both are acceptable, or is this a misapplication by officers?</p>	<p>possible. The email should include the applicant's full name and date of birth. Please note that not all LOAs are verified through the LOA verification portal, in which case, they may be completed manually through email.</p> <p>In cases where a student identifies a potential issue with the final decision (e.g. refusal) made in their application, they should submit a webform. When completing the form, they should provide an explanation as to the decision in question.</p> <p>IRCC continues to work on technical issues with the LOA verification Portal. Errors can also arise due to applicant input. To minimize errors, if the DLI would like to review or update their contact for the LOA verification Portal, they can contact IRCC.LOAPortal-PortailLA.IRCC@cic.gc.ca. Kindly note that the DLI can also add their own secondary users in the LOA verification portal; however, to amend the primary user, the DLI must contact the LOA Portal email. If the DLI would like to review or update their contacts for manual verifications, they can contact IRCC.IOBLoAVerification-VerificationLADGOI.IRCC@cic.gc.ca</p> <p>When applying for a study permit, students must submit a letter of acceptance from a designated learning institution (DLI) to IRCC. To avoid misunderstanding between letter of admission and letters of acceptance, IRCC has made available a template letter of acceptance for DLIs. Using this template facilitates the study permit application process. DLIs at the post-secondary level are encouraged to include the DLI number (which starts with the letter "O") in all letters of acceptance.</p> <p>The applicant needs to satisfy an officer that they've accepted the offer to attend the DLI and meet all eligibility requirements. The assessment of an application is in conjunction with the supporting documentation available to the officer. The onus is on the applicant to provide sufficient documentation to satisfy an officer that they meet the requirements.</p> <p>To summarize, what is important for IRCC is that the letter includes, at minimum, all the fields that IRCC included in its template letter.</p>
11. In cases where a PGWP applicant is eligible for a 3-year work permit but receives a shorter duration because of passport	No, clients do not need to provide a new valid language test result if they are applying to extend their PGWP due to passport validity.

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<p>expiration, will they require valid language test results as part of their PGWP extension application?</p>	
<p>12. Some students changed their academic program prior to November 1, 2024, but did not apply for a new study permit because their current permit was still valid. If they are now seeking an extension to complete the new program — and that program is not PGWP-eligible under the November 1 changes — are they still PGWP-eligible?</p> <p>The December 18 IRCC technical briefing indicated that a pre-November program change would preserve eligibility, but current PDIs suggest otherwise unless a new study permit was also submitted before the deadline. This has caused major concern among institutions and students, particularly where internal admissions practices do not always align with external permit requirements.</p>	<p>Applicants that applied for their original study permit prior to November 1, 2024, are grandfathered, regardless of field of study, even if they switch programs or extend their studies.</p> <p>We will be updating the PDIs to clarify.</p>
<p>13. No longer enrolled IRPR 222(1)(a.1)</p> <ul style="list-style-type: none"> ○ The addition of section 222(1)(a.1) to IRPR has caused concern for many institutions and students, particularly in the absence of clear guidance on how to interpret this provision in situations such as authorized leaves, letters of permission, academic suspensions, and required-to-withdraw scenarios (where students may have a right to appeal). Can IRCC elaborate on scenarios where students would be considered “no longer enrolled” in the context of R222(1)(a.1)? Do institutions have discretion as to how enrolment is defined? ○ In cases where R222(1)(a.1) applies and a study permit becomes invalid, can students apply for restoration (for example, if they are accepted to another institution) or is the study permit not restorable under R182(2) due to non-compliance with R220.1(1)? 	<p>DLIs have the discretion to define full-time enrollment.</p> <p>The IRCC website provides a glossary with definitions about enrollment statuses and defines “no longer registered or enrolled”.</p> <p>Also see responses to Q2, Q3, Q17 and Q18.</p>
<p>14. SOWP for PGWP</p> <ul style="list-style-type: none"> ○ In cases where the PGWP applicant is eligible for a 3-year work permit but receives a work permit of less than 16 months 	<p>As of January 21, 2025, open work permits are limited to the spouses or common-law partners of foreign workers employed in TEER 0 or 1 occupations, or certain TEER 2 or 3 occupations in sectors where there are labour shortages or which are</p>

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<p>because of passport expiration, is the spouse eligible for the SOWP? Several countries do not authorize passport renewal when their nationals hold a passport valid for more than 6 or 12 months.</p> <ul style="list-style-type: none"> ○ Does the principal's applicant's job have to be 16 months in length for the spouse to be eligible for a SOWP? For example, the principal applicant has a 12-month contract but is eligible for a 3-year PGWP. 	<p>linked to government priorities (e.g. occupations in the natural and applied sciences, construction, health care, natural resources, education, sports and the military).</p> <p>If the principle applicant receives a work permit for less than 16 months due to passport validity, but otherwise meets the criteria listed above, the spouse remains eligible for a spousal open work permit.</p> <p>The length of the principal applicant's job offer does not need to be 16 months or longer. Spousal open work permit eligibility is assessed based on the occupation type (TEER level) and whether it falls within an eligible sector, not the job contract length.</p> <p>Please note that the open work permit may be issued for a period that ends no later than the period of authorized stay of the principal foreign national or the date the applicant's passport expires, whichever comes first.</p>
<p>15. PAL</p> <ul style="list-style-type: none"> ○ In the previous Ministerial Instructions (MI79, effective October 10, 2024), students applying for restoration of status under R182(1) were noted as exempt from a PAL/TAL. However, the current Ministerial Instructions for 2025 do not include this exemption. Was this omission intentional? Will students now require a PAL/TAL to apply for restoration of their study permit, if they are not changing their institution or level of study? ○ Level of study for PAL requirements: As per the current Ministerial Instructions, "level of study" is categorized as follows: <ul style="list-style-type: none"> A. primary and secondary education, B. post-secondary education (including vocational and technical training, and undergraduate programs), and C. graduate education or above. (<i>niveau d'études</i>) • <p>In the case of graduate certificates and graduate diplomas, DLIs consider these programs of study to be at the graduate level. However, it is our understanding that PALs for these programs should be issued from the DLI's undergraduate allocation.</p>	<p>Answer, Part 1: Restoration</p> <p>Yes, a change was made to the 2025 Ministerial Instructions regarding restoration of status.</p> <p>Study permit holders who fall of out status and who are applying for restoration are not eligible for the PAL/TAL exemption (a) in the current Ministerial Instructions, even if they intend to return to studying at the same DLI in the same level of study, because this exemption applies only to those seeking to renew (but not restore) their study permit.</p> <p>Answer, Part 2: Level of Study</p> <p>IRCC considers the category "c. graduate education or above" in the Ministerial Instructions to include programs that lead to a master's degree or doctoral <i>degree</i> only.</p> <p>This aligns with how the Department defined the previous (2024) PAL/TAL exemption for study permit applications received from foreign nationals planning to study in a graduate degree program at the master's or doctoral level, and it aligns with how the</p>

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<p>Given the above-noted discrepancy in definitions, can IRCC confirm:</p> <ul style="list-style-type: none"> ○ Are students who are moving from a graduate diploma or graduate certificate to a master's or doctoral degree program within the same DLI considered by IRCC to be changing their level of study and thus require a PAL if applying to extend their study permit? ○ Are students who are moving from an undergraduate degree, diploma or certificate to a graduate diploma or certificate within the same DLI considered to be changing their level of study and thus require a PAL if applying to extend their study permit? ○ Are language courses (English or French as an Additional Language) considered "post-secondary education," "graduate education," or both depending on the circumstances? <ul style="list-style-type: none"> • In a case where an EAL or FAL course/program is a prerequisite for a graduate program to which a student has been conditionally admitted, would the student require a PAL from the DLI's undergraduate or graduate allocation to apply for their study permit? • Are students who are moving from a prerequisite EAL or FAL course to a graduate degree considered to be changing their level of study and thus require a new PAL to extend their study permits? 	<p>Department is counting the (2025) allocations reserved for graduate (master's and doctoral) degree students.</p> <p>Consequently, PALs/TALs for graduate certificate and graduate diploma programs should be issued from the DLI's general (undergraduate) allocation. These programs – which may be offered by colleges, universities, or other types of institutions – are considered to be included in the category "b. post-secondary education", even if they include the term "graduate" or "post-graduate."</p> <p>Similarly, IRCC considers language programs to be included in the category "b. post-secondary education," along with any other level of study (such as flight school programs) that does not clearly fit in categories A (primary and secondary education) or C (graduate education or above).</p> <p>Students who successfully complete a prerequisite language program will need to apply for a new study permit and demonstrate they have completed the admission requirements before they can begin their next phase of studies.</p> <ul style="list-style-type: none"> • If the student is progressing from a language program to a master's or doctoral degree program at the same DLI, then they will need to obtain a new PAL/TAL for their subsequent study permit application. In this scenario, they are considered to be changing level of study. • If the student is progressing from a language program to a program included in the category B level of study, at the same DLI, then they would meet the PAL/TAL exemption criteria and would not need to obtain a new PAL/TAL for their subsequent study permit application. In this scenario, they are considered to be remaining at the same level of study. <p>We also recognize that, in Quebec, vocational and professional training programs can be delivered both at the secondary or post-secondary level. The Quebec vocational programs that are delivered at the secondary level, leading to one of the following accreditations, do not require a PAL and also belong to category A in the Ministerial Instructions:</p> <ul style="list-style-type: none"> • Diploma of Vocational Studies (DVS)

Question	Response
	<ul style="list-style-type: none"> ○ In French: <i>Diplôme d'études professionnelles</i> (DEP) ● Attestation of Vocational Specialization (AVS) <ul style="list-style-type: none"> ○ In French: <i>Attestation de spécialisation professionnelle</i> (ASP) ● PreWork Training Certificate (PWTC) <ul style="list-style-type: none"> ○ In French: <i>Certificat de formation préparatoire au travail</i> (CFPT) ● Training Certificate for a Semiskilled Trade (TCST) <ul style="list-style-type: none"> ○ In French: <i>Certificat de formation à un métier semi-spécialisé</i> (CFMS)
<p>16. “217.1 If the holder of a study permit in Canada whose permit names a designated learning institution is accepted to undertake a course or program of study at a different designated learning institution and intends to attend that new institution, they must submit an application for a new study permit that names the new designated learning institution.”</p> <ul style="list-style-type: none"> ○ As per R217.1, can IRCC confirm that “names a designated learning institution” means that the specific DLI name is printed on the physical study permit document? ○ Since most study permits do not have a specific institution name printed on them, can IRCC confirm our interpretation that R217.1 does not apply to them? 	<p>See Q1 response.</p>
<ul style="list-style-type: none"> ○ Scenarios. These are common models used in post-secondary institutions, where two institutions have an agreement allowing students to complete the initial part of a program at one DLI before transferring to the partner DLI to complete their credentials. <ul style="list-style-type: none"> ○ <i>2+1+1 Example:</i> ○ In a 2+1+1 program, a student will receive an LOA for DLI A and sometimes DLI B at the same time or it may be given at a later date. They will complete 2 years at DLI A, transfer to DLI B for the 3rd year, and come back to DLI A for their 4th year to complete their credential. Can IRCC clarify if, in these situations, students would need to apply and be approved for a new study permit before starting at DLI B, and again before returning to DLI A? If so, would this be the case even if their original study permit for DLI A is not expired? 	<p>If a pathway student is transferring DLIs as part of their program, they need to apply for a new study permit and have it approved before starting at the new DLI, unless they meet specific exceptions outlined in the regulations.</p> <p>IRCC is working closely with PTs to provide additional guidance and clarifications for scenarios where students are enrolled in <i>one program</i>, delivered jointly by multiple DLIs, leading to <i>one credential</i>. Updates will follow when available.</p> <p>Students will need to take into account study permit processing times and apply for their study permit or extension well in advance.</p> <p>See response #18 for more details on the exchange student scenario</p>

Question	Response
<ul style="list-style-type: none"> ○ <i>Example:</i> ○ A student is accepted into an ESL prerequisite course at a college and also has a conditional offer to start a bachelor's program once the English requirement is complete. Will the student require two study permits (one for the prerequisite course and one for the bachelor's program)? If so, can the student use the conditional LOA from the bachelor's program to apply for their second study permit alongside the first? ○ In-Canada exchanges <ul style="list-style-type: none"> ○ <i>Example</i> ○ A student currently enrolled in DLI A has been accepted to complete an exchange semester at DLI B in Canada. During their exchange, they will be enrolled in a placeholder course at DLI A while also enrolling in academic courses at DLI B. Can IRCC clarify if, in these situations, students would need to apply and be approved for a new study permit before starting at DLI B? 	
<p>17. Required to withdraw/academic suspension.</p> <p>At most post-secondary institutions, students who are on academic probation and who fail to meet GPA requirements at the end of the subsequent term are required to withdraw from the DLI for a period of time and can only be readmitted after studying at another institution and achieving a certain GPA. It is important to note that, for example, in the fall term, students may only be advised that they did not meet the GPA at the end of the term, in mid-late December, immediately prior to most institutions' winter break closures. Previously, in these cases, students would have a 150-day grace period to gain acceptance and begin studies at another institution, leave Canada, or pursue an appeal with the DLI.</p> <ul style="list-style-type: none"> ○ With the implementation of R222(1)(a.1), can you clarify our understanding that these students would lose status as of the date they are required to withdraw and that once accepted to another DLI, they would then need to apply for restoration? ○ Many institutions have appeal processes for students. If a student is required to withdraw and is then reinstated at the 	<p>There are a few cases where students may be able to take a DLI-authorized leave of up to a maximum of 150 days from their program of studies and still be considered to be actively pursuing their studies. For more information: Your conditions as a study permit holder in Canada - Canada.ca.</p> <p>Beyond these circumstances, where a suspended student is no longer enrolled at their original DLI, and/or has changed DLIs without applying for a new study permit, their previous study permit may be rendered invalid and the student may be considered to be studying without authorization. An IRCC officer will exercise discretion and consider factors (e.g. student compliance with study permit conditions, validity of previous study permit) with respect to a student that has changed DLIs in this scenario. If it is determined that the student is non-compliant, the student may face consequences including having their study permit cancelled, or being asked to leave the country. For more information: Changing your school or program - Canada.ca</p>

Question	Response
<p>original DLI following a successful appeal, would their study permit then become valid again, or would they need to apply for restoration due to the gap in enrolment caused by their previous academic status?</p>	
<p>18. Letters of Permission. Students often seek permission from their “home” DLI to take courses at another institution, with the intention of transferring credits back toward their credentials at the home DLI. They may or may not be registered at their home DLI during the time they have permission to take courses elsewhere. Would these students require a new study permit for the time they will take courses at the additional DLI, and would their study permit for their home DLI remain valid if they are not registered there during this time?</p>	<p>If a student has permission from their 'home DLI' to take courses at another DLI (e.g., exchange agreement), but they continue to be enrolled at the 'home DLI', the student is meeting the conditions of their original study permit and is permitted to remain on original study permit.</p> <p>If a student is enrolled in a separate course/ program at another DLI than the one that is associated with their study permit and the course/program is more than 6 months, they will need to apply and obtain a new SP.</p> <p>If the student has a letter of permission from home DLI, but is no longer enrolled at home DLI, then they need a new study permit and need to wait for approval before they transfer to new DLI.</p>
<p>19. As per the current <u>PDI directives</u>, if a student changes DLI or if a student must defer their studies, “<i>they should begin or resume their studies at their new DLI within 150 days from the day that they ceased or completed their studies at the previous institution. If a student does not resume their studies within 150 days, they should do either of the following:</i></p> <ul style="list-style-type: none"> <i>a) change their status (that is, change to visitor status or worker status)</i> <i>b) leave Canada</i> <p><i>If they do not change their status or leave Canada, they are considered non-compliant with their study permit conditions.</i>”</p> <p>IRCC previously confirmed verbally that students would also have to apply for a visitor record if there are more than 150 days before they are able to start their new program. We would like to highlight that the delays are beyond the students' control, making it difficult for them to adhere to the timelines they were counting on for their studies; IRCC processing times are currently sitting at over 200 days.</p>	<p>No. The “150 days” referred to in the question relates to a period of leave from studies authorized by the student’s DLI. It is not related to scenarios where a new SP application submitted for a desired change in DLIs is pending final decision.</p> <p>Students who have a valid study permit must continue to study at their current DLI while they apply for a study permit extension to transfer to another DLI. While a temporary facilitation allowed certain transfer students – who were slated to start at a new DLI in winter/spring 2025 – to begin studies at the new DLI, this temporary facilitation had a clear expiry date of May 1st 2025.</p> <p>For additional information: Changing your school or program - Canada.ca</p>

Question	Response
<p>These students are being compliant by submitting a study permit application within Canada and waiting for the new study permit before beginning their new program. Requiring additional applications, such as a visitor record, will unnecessarily burden an already strained immigration system, potentially exacerbating delays for all applicants.</p> <p>Can IRCC confirm that a student who has submitted a study permit application because they are changing DLI and must wait more than 150 days for the permit to be processed also needs to apply for a visitor record in order to stay compliant?</p>	

Last Updated: May 20, 2025