Private Career College Key Performance Indicator Audit Guideline:

Enrolment and Graduate Reporting

2015 Collection Cycle

Change to One-time Annual Audit Requirement

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Purpose and Application

The Superintendent of Private Career Colleges (Superintendent), a designate of the Minister of Training, Colleges and Universities calculates and publishes Key Performance Indicators (KPIs) for private career colleges (PCCs) in Ontario in order to help students make informed decisions around their postsecondary education. KPIs also inform government decision-making and provide PCCs with tools to improve the quality of their vocational programs. The Superintendent has defined the following five PCC KPIs:

(a) Graduation Rate (sole non-survey-based KPI);
(b) Graduate Employment Rate;
(c) Graduate Employment Rate in the Field of Study;
(d) Graduate Satisfaction Rate; and
(e) Employer Satisfaction Rate.

For the 2015 collection cycle, this KPI Audit Guideline ("Audit Guideline") applies to **all registered PCCs in Ontario**. The Audit Guideline sets out the requirements for conducting an audit of the student and graduate data that must be prepare by PCCs and reported to a third party service provider, working on behalf of the Superintendent, for the purpose of calculating and publishing KPIs for the vocational programs provided by PCCs.

Legal Authorities

Under the *Private Career Colleges Act, 2005* (Act), the Superintendent is authorized to request financial and other information, including audited enrolment and graduate data, from PCCs.

Under the authorities set out under subsection 53 (1) (a) of the Act, Policy Directive #11 - Private Career College Key Performance Indicators and Performance Objectives, and section 36.1 of Ontario Regulation 415/06 (Appendix B), the Superintendent requires PCCs to report student- and graduate-level information with data elements that include personally identifiable elements, as defined under subsection 2 (1) of the *Freedom of Information and Protection of Privacy Act*, *1990* (FIPPA). This data is reported to Forum Research Inc. (Forum), the third party service provider working on behalf of the Superintendent under the authority of section 50 (1) of the Act.

PCCs are required to report the enrolment and graduate data set out under section 36.1 of Ontario Regulation 415/06 to allow for the calculation of graduation rates for their vocational programs and the administration of two surveys – a graduate outcomes survey and an employer satisfaction survey. Survey results will be used to calculate KPIs (b)-(e) above.

Change to One-time Audit for 2015 Collection Cycle

Starting with the 2015 KPI collection cycle, which now includes all PCCs in Ontario, the Superintendent has decided to move to a one-time per year audit requirement. All PCCs must have all of their 2015 data files audited by September 1, 2016:

1. **OSAP-approved PCCs that participated in the 2014 cycle:** For the 2014 collection cycle, OSAP-approved PCCs must adhere to the former requirement and submit their 2014 KPI Audit Report by their renewal of registration deadline. Any 2014 files that were not audited by the PCC's 2014 renewal deadline must be audited by its 2015 renewal deadline. All 2015 data files (Winter, Summer, Fall) must be audited by September 1, 2016

2. **OSAP-approved PCCs that have had all of their 2014 data audited:** the next audit report is not due until September 1, 2016. Please refer to Appendix C for details. <u>All 2015 data files (Winter, Summer, Fall) must be audited by September 1, 2016.</u>
3. **First time reporters for the 2015 cycle (starting July 1, 2015):** <u>All 2015 files (Winter, Summer, Fall) and all historical data must be audited by September 1, 2016.</u>

Since the ministry began collecting KPI data in 2013, the Superintendent has strived to incorporate lessons learned from the first two phases of KPI implementation. One recurring topic of discussion is around the timing of the KPI audit requirement. There has been a significant amount of confusion among institutions and their auditors regarding when their audit is due and what data must be audited by the deadline.

For the 2013 and 2014 collection cycles, the Superintendent required OSAP-approved PCCs to submit their KPI audit by their renewal of registration deadline. As PCCs have different renewal deadlines, PCC auditors would only be able to audit the files uploaded prior to the institutions' renewal deadline. The Superintendent hoped that, by timing this audit requirement with PCCs' financial audit, it might reduce the costs associated with both audits. However, feedback from PCCs, auditors and the Association of Chartered Professional Accountants of Canada (CPA) has suggested that linking the KPI audit requirement to PCCs' renewal deadline does not, in fact, reduce the cost for PCCs and may actually result in more confusion in the sector.

As such, the Superintendent has chosen to move to a **one-time per year audit requirement for the 2015 collection cycle**, which now includes all PCCs. Since the last data upload window for this cycle closes on March 31, 2016, the Superintendent has set the KPI audit deadline for **September 1, 2016**. Audit reports for Fall, Winter and Summer 2015 data should be submitted by this time. See **Appendix C** for further details.

Glossary

(a) KPI Auditors: KPI auditors must be accountants licensed to practice as a public accountant in the province of Ontario as defined under the *Public Accountancy Act, 2004*, who are engaged by a PCC to conduct an audit of the enrolment and graduate data files, as required by the Superintendent.

(b) Data Upload Windows: All registered PCCs are required to upload data to Forum at three set time periods per calendar year. PCCs participating in the KPI initiative for the first time ("first time reporters") are also required to upload historical data during the first data upload window:

	Data Upload Window	Data Uploaded	Student/Graduate Terms Represented by Data
1	**Winter:** July 1 – August 31, 2015	All Winter Term entrants and graduates **First time reporters also required to submit historical data.**	January 1 – April 30, 2015 **Historical Data (first time reporters only): All terms going back 200% of the duration of the PCC's longest vocational program.**
2	**Summer:** October 1 – November 30, 2015	All Summer Term entrants and graduates	May 1 – August 31, 2015
3	**Fall:** February 1 – March 31, 2016	All Fall Term entrants and graduates	September 1 – December 31, 2015

(c) Entrant: a student who enrols in a PCC's vocational program and does not withdraw from the program before its defined Grace Period. A student who enrols in a PCC's non-vocational program is **not** considered an entrant for the purposes of KPIs.

(d) Enrolment Reporting: PCCs must report their entrants to Forum at three distinct times per KPI collection cycle (see "Data Upload Windows" above). The terms that must be reported in each data upload window are the Winter, Summer and Fall Terms, respectively. Beginning with the 2015 collection cycle, all PCCs must have an audit conducted of the enrolment data submitted to Forum and the ministry by September 1st of the year after their Winter upload (e.g., Audit due September 1st, 2016 for the cycle starting on July 1, 2015).. See Appendix C for the audited data requirements by PCC and their corresponding deadlines.

- **SPECIAL NOTE FOR FIRST TIME REPORTERS**: For the 2015 collection cycle, PCCs participating in KPIs for the first time must report all entrants and graduates for all terms encompassing 200% duration of their longest program as of January 1, 2015 and then for each term thereafter. This additional information is required to calculate 2015 graduation rates for vocational programs provided by the PCC and, therefore, must be included in the audit.

(e) File Reference Number: A unique confirmation number provided by Forum for each successfully uploaded enrolment or graduate file. In the final audit report, PCC auditors are required to provide a list of the enrolment and graduate files audited as a schedule to their final audit report, specifying the file reference numbers, original versus revised files and necessary corrections.

(f) First Time Reporters: PCCs participating in the KPI initiative for the first time.

(g) Graduation Date: The date on which a former student of an approved vocational program has completed all necessary requirements of the program, including all academic and practical requirements.

(h) Grace Period: The calendar period of time during which an entrant can withdraw from a vocational program and not be considered to have started that program. The Grace Period will be defined as the lesser of 25% of program duration (e.g., one week for every month), **to a maximum of eight weeks.**

(i) Graduate: A former student of a registered PCC who has completed all the necessary requirements for a full-time or part-time vocational program that has been approved by the Superintendent, including all academic and practical requirements as approved by the Superintendent. Every graduate must be reported by the PCC to Forum for his or her final Graduation Term of study in a graduate data file within three months of the end of the graduate's Graduation Term:
- Reported for his or her final term of study, and
- Previously reported in an audited enrolment file for the current or prior term.

A former student of a PCC's non-vocational program is not considered a graduate for the purposes of KPIs.

(j) Graduation Allowed Period: the calendar period of time within which an entrant is expected to graduate, calculated as 200% of the program's duration (in weeks). Entrants who do not graduate within this period are deemed to have not graduated.

(k) Graduate Reporting: PCCs must report their graduates to Forum at three distinct times per KPI collection cycle (see "Data Upload Window" above). The terms that must be reported in each data upload window are the Winter, Summer and Fall Terms, respectively. Beginning with the 2015 collection cycle, all PCCs must have an audit conducted of the graduate data submitted to Forum and the ministry by September 1st of the year following their Winter upload (e.g., Audit due September 1st, 2016 for the cycle starting on July 1, 2015). See Appendix C for the audited data requirements by PCC and their corresponding deadlines.
- **SPECIAL NOTE FOR FIRST TIME REPORTERS**: For the 2015 collection cycle, PCCs participating in KPIs for the first time must report all entrants and graduates for all terms encompassing 200% duration of their longest program as of January 1, 2015 and then for each term thereafter. This additional information is required to calculate 2015 graduation rates for vocational programs provided by the PCC and, therefore, must be included in the audit.

(l) Terms (Entrants/Graduates): Three defined periods per calendar year in which PCCs must track (and report during an associated data upload window) new entrants in and graduates of their vocational programs. The enrolment and graduate terms are as follows:

Term	Date of Graduation (2015)
Winter	January 1 – April 30
Summer	May 1 – August 31
Fall	September 1 – December 31

See (b), "Data Upload Windows" above to determine when each term of entrants/graduates must be reported.

(m) Private Career College (PCC): A PCC is an educational institution or other institution, agency or entity that provides one or more vocational programs to students for a fee and pursuant to individual contracts with the students, but does not include a College of Applied Arts and Technology, a public university or a school as defined under the *Education Act*.

(n) *Private Career Colleges Act, 2005* (Act): The legislation that governs PCCs and ensures they meet certain standards for the vocational programs they offer, as well as advertising, refund policies, and instructor qualifications.

(o) Program Start Date: The date on which a student commenced training in a vocational program provided by a registered PCC, as specified in the student's enrolment contract with the PCC.

(p) Student Identification Number: A unique student identification number **must** be provided for every student and graduate of a PCCs' vocational program and must follow the student from enrolment to graduation. The same number should be used if a student enrolls in more than one vocational program at the PCC. This number is used to match enrolment records with graduate records. Each student identification number must be 15 characters or less.

(q) Superintendent of Private Career Colleges (Superintendent): An appointee of the Minister of Training, Colleges and Universities who may exercise the powers and shall perform the duties conferred or imposed upon him or her by or under the Act*.*

(r) Transfer Student: A student who transferred from one vocational program into another vocational program within the same institution (legal entity). Transfers are not permitted between legal entities.

(s) Vocational Program: a full-time or part-time postsecondary program of instruction, provided by a registered PCC, that provides the skills and knowledge required in order to obtain employment in a prescribed vocation, as defined under the Act. All vocational programs must be approved by the Superintendent.

Audit Requirements – Enrolment and Graduate Data

All registered PCCs are to engage a licensed public accountant in the province of Ontario, pursuant to the *Public Accountancy Act, 2004*, to provide an audit report on their enrolment and graduate data. This audit report is due at the same time as the audit of PCCs' financial statements – by their renewal of registration deadline. The cost of performing the audit is the responsibility of the PCC.

The audit reports must be **uploaded to Forum's website by the PCC auditor and sent to the ministry**: Radu.Mocanu@ontario.ca, copying PCCKPI-Policy@ontario.ca.

Based on the internal records maintained by the PCC, auditors are required to provide the ministry with a **level of assurance that the information in the enrolment and graduate data files reported to Forum has not been misstated.**

Auditors must assess whether or not the PCC reported its student/graduate activity for all approved vocational programs offered to students as of January 1st of the associated KPI collection cycle. For example, for the 2015 collection cycle, PCCs must report on all programs offered to students as of January 1, 2015. If a vocational program is cancelled mid-collection cycle, it must still be reported on for the remainder of the cycle.

PCCs participating in the KPI initiative for the first time are also required to report and have audited historical data within the first data upload window running July 1 – August 31, 2015. This historical data includes all entrants and graduates who enrolled/graduate in the PCC's vocational program over the **past** period of time representing 200% duration of the PCC's longest vocational program as of January 1, 2015.

Auditors are required to provide assurance for the following information, using the appropriate sample of enrolment and graduate data files **provided to Forum prior to the submission deadline (see Appendix C for more information)**:

   a) The individual's **first and last name**;
   b) The individual's **student identification number**;
   c) The approved **campus and vocational program** in which the individual is/was undergoing training;
   d) The individual's **enrolment date**;
   e) The individual's **graduation date**;
   f) Students reported to have **transferred from one vocational program to another** within the same legal entity; and
   g) Terms in which the PCC reported to have no entrants or graduates (e.g., **null files**).

Note: It is not necessary for auditors to validate all fields included in the enrolment and graduate data files and outlined in the 2014 KPI Operating Procedure. The ministry only requires an auditor's opinion around (a)-(g) above.

The ministry views as being of considerable merit the application of *statistical sampling* techniques in support of the auditor's opinion. Where such techniques are applied, the ministry considers appropriate a confidence level of **95 per cent and a precision limit of 2 per cent** with respect to the upper limit of net overstatement. Specifically, in such a case, an auditor's opinion without reservation or qualified items would be interpreted as attesting with 95 per cent certainty to the PCC's reporting of its enrolment and graduate activity. The enrolment and graduate data are not more than 2 per cent greater than the values that would have been

derived if every student record had been examined. Please see the KPI Auditor Questions and Answers for tips around determining sample size.

Errors detected in the enrolment and graduate sample selected are to be identified by the auditor and corrected by the PCC. The PCC is then responsible to resubmit the revised file to Forum. Further investigation should be undertaken by the auditor to determine whether or not such errors are unusual occurrences or are indications of systematic reporting problems.

An error report/statement of omissions or overstatements[1], along with any documentation pertaining to unusual occurrences or systemic reporting problems, is to be reported to the PCC and uploaded to Forum by the PCC auditor. See Appendix A for the error report template.

Error Reports/Statement of Omissions or Overstatements

Any errors detected by the PCC auditor in the data files are to be identified by the auditor to the PCC and immediately corrected by the PCC as follows:

1. The PCC auditor is to identify to the PCC the changes required to correct errors in the graduate and enrolment data files;
2. The PCC is then to make the changes required to correct the errors and re-submit these files to Forum, generating new file reference numbers for the revised files; and
3. The PCC auditor is to verify that all errors have been corrected.

A list of the enrolment and graduate files audited, specifying original versus revised files and all necessary corrections, is a requirement of the final audit report, provided by the PCC auditor to the PCC and uploaded to Forum. **The PCC auditor must ensure that the revised file contains all of the required corrections.** See Appendix A for a sample auditor's report including an error report template.

Changes to Submitted Data

The submission of an accurate audit of enrolment and graduate data is crucial. It is therefore critical that students and graduates are accurately reported by the PCC and submitted to Forum on a timely basis.

Adjustments to the enrolment and graduate data files will not be accepted after the enrolment and graduate audit report is submitted by the auditor except under extraordinary circumstances and only with explicit authorization from the Superintendent. Any proposed adjustments requested after the audit is submitted must be authorized by the PCC's key executive – president, Chief Executive Officer, owner, director or officer – and the PCC's auditor.

Audited Enrolment and Graduate Report

An auditor's report, without reservation or qualified items, is required for the PCC KPI initiative. If the auditor is unable to provide a report without reservation or qualified items, a full written rationale is to be sent by the auditor to the PCC and uploaded to Forum. Further direction will be provided by the Superintendent to the PCC after reviewing the matter.

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[1] This file should summarize the errors that were identified by the auditor and corrected by the PCC.

The PCC's auditor is required to:

Upload to Forum[2] and provide to the ministry the complete audited enrolment and graduate report by the PCC's renewal of registration deadline. This report should be uploaded as one document in PDF format and made up of the following components and in the following order:

1. The **Auditor's Report**, signed and dated by the external auditor who performed the audit using the template provided and citing all confirmation numbers for the files that have been audited, including any revised files. See Appendix A for a template of the auditor's report.
2. If one has been provided to the PCC, a copy of the **auditor's management recommendation letter**; and
3. If errors have been detected during the audit process, a **summary file of the errors that were detected** by the auditor and corrected by the PCC (e.g., error report), along with any documentation pertaining to unusual occurrences or systemic reporting problems. The PCC auditor must ensure the revised file contains all of the required corrections.

Auditors' Forum Portal

The final auditor's report must be on the same data as was provided to Forum. With the file reference number, the auditor has access to the data files on Forum's secure web site. If any changes are required to the data files, it is the PCC's responsibilities to make these changes and re-upload the revised file(s) to Forum.

For further information regarding the Auditor Portal, please contact the service provider, Forum Research Inc., at pcckpi@forumresearch.com.

Private Career College Data Reporting Requirements

For the 2014 collection cycle, starting July 1, 2014, each OSAP-approved PCC is to submit to Forum and the ministry its KPI audit report by its renewal of registration deadline, for all data corresponding to individuals who enrolled or graduated in 2014.

For the 2015 Collection Cycle, starting July 1, 2015, the Superintendent has decided to move to a one-time per year audit requirement. All PCCs in Ontario must submit to Forum and the ministry its KPI audit report by September 1, 2016, for all data corresponding to individuals who enrolled or graduated in 2015.

As part of the KPI audit process, the PCC is responsible for the following:

- Preparing and uploading to Forum, CVS or Excel files with entrants for approved vocational programs of instruction, as detailed in the 2015 KPI Operating Procedure.

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[2] It is a requirement of the KPI initiative that the final audited enrolment and graduate report is uploaded to Forum by the PCC auditor and not by the PCC. The same requirement exists in the public college sector.

- Preparing and uploading to Forum, CVS or Excel files with graduates of approved vocational programs of instruction, as detailed in the 2015 KPI Operating Procedure.
- Engaging an accountant licensed to practice as a public accountant in the province of Ontario, pursuant to the Public Accountancy Act, 2004 to conduct an audit of the enrolment and graduate data provided to Forum within its fiscal year.
- If errors are identified by the PCC auditor, making all revisions to the enrolment and graduate data files that would correct these errors.
- Uploading all revised enrolment and graduate files to Forum. Submitting the complete audited enrolment and graduate report provided by the PCC auditor to the Superintendent by the corresponding deadline (see Appendix C).

Further requirements for preparing the enrolment and graduate date files are provided in the following pages and in more detail in the 2015 KPI Operating Procedure. PCCs are to adhere to these requirements unless they have received advanced written approval from the Superintendent to deviate from the requirements.

Enrolment Data Files

PCCs are to maintain a complete and up-to-date list of all Superintendent-approved vocational programs of instruction provided at each of its campuses.

In preparation for completing the enrolment data files, PCCs are to ensure that their approved vocational programs continue to be provided to students as approved in the ministry's Registration Information for Career College (RICC) system. Should there be any discrepancies between how a vocational program is delivered and the information included in RICC, PCCs must contact their Inspector to reconcile the differences.

PCCs are to prepare the enrolment data file in either a CSV or Excel file. See Appendix D for a sample enrolment data file.

Note: When a PCC has had no entrants within a term, it must file a null/blank enrolment data file. The auditor will then have to confirm that the PCC did, in fact, have no entrants for that term. New OSAP PCCs are not required to upload enrolment/graduate files for vocational programs that were no longer Superintendent-approved as of January 1, 2015.

Graduate Data Files

PCCs must provide information on their graduate population to Forum in order to allow for the administration of a graduate outcomes survey and an employer satisfaction survey (allowing for the calculation of four of the five PCC KPIs) and the calculation of graduation rates for vocational programs. PCCs are to prepare a graduate data file according to the 2015 KPI Operating Procedure. Graduate data files must be filed for the same terms as the enrolment data files (e.g., Winter, Summer and Fall).

PCCs are to prepare the graduate data file in either a CSV or Excel file. See Appendix E for a sample graduate data file.

Note: When a PCC has had no graduates within a term, it must file a null/blank graduate data file. The auditor will then have to confirm that the PCC did, in fact, have no graduates for that term. New OSAP PCCs are not required to upload enrolment/graduate files for vocational programs that were no longer Superintendent-approved as of January 1, 2015.

Summary of Responsibilities

Auditors

The auditor is required to:

- Express an opinion on the PCC's enrolment and graduate activity for the 2015 collection cycle, in accordance with the CICA Handbook, Section 5800 – Special Reports. See Appendix C for the audited data requirements for PCCs with various fiscal year ends.
    - For PCCs participating in the KPI initiative for the first time, auditors must also express an opinion on the historical data reported to Forum: enrolment/graduate data for all **past** terms encompassing 200% duration of the PCC's longest vocational program as of January 1, 2015.
- Examine the appropriate sample of enrolment and graduate data files to provide the ministry with a level of assurance that the information in these files has not been misstated. Auditors are to compare the training status of sampled students and graduates recorded in the PCCs' enrolment and graduate data files to the school's internal records, including those used to generate transcripts.
- Identify any errors in the PCC's reported enrolment and graduate activity and advise the PCC of the changes required to correct these errors.
- Ensure that enrolment and graduate files revised by the PCC contain all the required corrections.
- Prepare an audited enrolment and graduate report, including an error report, if applicable, and any management recommendation letters developed for the PCC. **The complete 2015 audited enrolment and graduate report must be provided to the ministry and uploaded to Forum by September 1, 2016. This audit report should include all 2015 enrolment and graduate data and all historical data (200% of longest program's duration) for first time reporters.**

Private Career Colleges

The PCC is responsible for:

- Preparing and uploading to Forum, CVS or Excel files with entrants for approved vocational programs of instruction, as detailed in the 2015 KPI Operating Procedure.
- Preparing and uploading to Forum, CVS or Excel files with graduates of approved vocational programs of instruction, as detailed in the 2015 KPI Operating Procedure.
- Engaging an accountant licensed to practice as a public accountant in the province of Ontario, pursuant to the *Public Accountancy Act, 2004* to conduct an audit of the enrolment and graduate data provided to Forum within its fiscal year. See Appendix C for the audited data requirements by PCC fiscal year end.
- Making any changes required to correct errors in the enrolment and graduate data files, as identified by the PCC's auditor.
- Resubmitting revised enrolment and graduate data files to Forum.
- Submitting the complete audited enrolment and graduate report to the Superintendent within the specified deadline.

Ministry of Training, Colleges and Universities

The ministry is responsible for:

- Maintaining the KPI Operating Procedure and Audit Guideline and providing advice on the procedures to PCC officials and auditors.
- Using the data to advise and inform government about the PCC system's achievement of its mandate and in planning and policy-making for the PCC system.

Need More Information?

If you have questions about the renewal of registration process,

please contact:

Ministry of Training, Colleges and Universities

Registration Unit, Private Career Colleges Branch

77 Wellesley Street, BOX 977

Toronto, ON M7A 1N3

Telephone: (416) 314-0500 or 1-866-330-3395

Fax: (416) 314-0499

The full text of the Act and regulations can also be downloaded from the Ontario government E-Laws website at:

www.e-laws.gov.on.ca

Appendix A: Auditor's Report Templates

[A PDF version of this document can be downloaded from Forum's website at www.pcckpi.ca]

AUDITOR'S REPORT (PCCs already participating in the KPI initiative)

To the Superintendent of Private Career Colleges:

We have audited **[name of private career college]**'s compliance with enrolment and graduate data reporting requirements as set out under section 36.1 of Ontario Regulation 415/06; Policy Directive #11 – Private Career College Key Performance Indicators and Performance Objectives; and the applicable Key Performance Indicator (KPI) Operating Procedure. For the 2015 KPI collection cycle, our audit included **[name of private career college]**'s reporting of all entrants and graduates for the terms from **[earliest term]** to **[last term required, as set out in Appendix C]**, as set out in Appendix C of the KPI Audit Guideline. Compliance with the above referenced documents is the responsibility of the management of the PCC. Our responsibility is to express an opinion on the compliance of the PCC in reporting its enrolment and graduate data based on our audit.

Our audit was conducted in accordance with generally accepted auditing standards. Those standards require that we plan and perform an audit to obtain reasonable assurance of whether the reported enrolment and graduate data, as listed in Schedule A, complied with the reporting requirements set out under section 36.1 of Ontario Regulation 415/06; Policy Directive #11 – Private Career College Key Performance Indicators and Performance Objectives; and the applicable KPI Operating Procedure. Such an audit includes examining, on a test basis, evidence supporting compliance, evaluating the overall compliance with these criteria, and where applicable, assessing the accounting principles used and significant estimates made by management.

In our opinion, **[enter name of private career college]**, for the terms from **[earliest term]** to **[last term required, as set out in Appendix C]**, is in compliance, in all material respects, with enrolment and graduate reporting requirements set out under section 36.1 of Ontario Regulation 415/06; Policy Directive #11 – Private Career College Key Performance Indicators and Performance Objectives; and the applicable KPI Operating Procedure.

City   ....…

(Signed)...
          Licensed Public Accountant

Date   ....…

AUDITOR'S REPORT (PCCs participating in the KPI initiative for the first time)

To the Superintendent of Private Career Colleges:

We have audited **[name of private career college]**'s compliance with enrolment and graduate data reporting requirements as set out under section 36.1 of Ontario Regulation 415/06; Policy Directive #11 – Private Career College Key Performance Indicators and Performance Objectives; and the applicable Key Performance Indicator (KPI) Operating Procedure. For the 2015 KPI collection cycle, our audit included **[name of private career college]**'s reporting of all entrants and graduates for 200% of the duration of its longest vocational program, for the terms from **[earliest term]** to **[last term required, as set out in Appendix C]**, as set out in Appendix C of the KPI Audit Guideline. Compliance with the above referenced documents is the responsibility of the management of the PCC. Our responsibility is to express an opinion on the compliance of the PCC in reporting its enrolment and graduate data based on our audit.

Our audit was conducted in accordance with generally accepted auditing standards. Those standards require that we plan and perform an audit to obtain reasonable assurance of whether the reported enrolment and graduate data, as listed in Schedule A, complied with the reporting requirements set out under section 36.1 of Ontario Regulation 415/06; Policy Directive #11 – Private Career College Key Performance Indicators and Performance Objectives; and the applicable KPI Operating Procedure. Such an audit includes examining, on a test basis, evidence supporting compliance, evaluating the overall compliance with these criteria, and where applicable, assessing the accounting principles used and significant estimates made by management.

In our opinion, **[enter name of private career college]**, for the terms from **[earliest term]** to **[last term required, as set out in Appendix C]**, is in compliance, in all material respects, with enrolment and graduate reporting requirements set out under section 36.1 of Ontario Regulation 415/06; Policy Directive #11 – Private Career College Key Performance Indicators and Performance Objectives; and the applicable KPI Operating Procedure.

City   ....…

(Signed)...
           Licensed Public Accountant

Date   ....…

SCHEDULE A: ERROR REPORT TEMPLATE

| Audited File

(Reference File Number) | File Status

(Original "O" versus Revised "R") | Further Information/

Summary of Corrections |
|---|---|---|
| | | |
| | | |
| | | |
| | | |

Appendix B: Ontario Regulation 415/06

PART VII.1
INFORMATION CONCERNING STUDENTS AND GRADUATES

Information, students and graduates
36.1 **(1)** On the request of the Superintendent, private career colleges shall provide the following information about a current student or graduate:

1. The individual's name.

2. The individual's student number.

3. The individual's permanent address and his or her local address if it differs from the permanent address.

4. The individual's permanent and local telephone numbers and cell phone number, if any.

5. The individual's email address.

6. The individual's date of birth.

7. The individual's gender.

8. Whether the individual's first language is English or French.

9. Whether the individual requires accommodation in order to participate in a survey.

10. Whether the individual is or was on a student visa.

11. Whether the individual received a student loan under the *Ministry of Training, Colleges and Universities Act* or any other government funding.

12. The details of the individual's program, including its name, duration (in hours and weeks), format (whether full-time or part-time) and whether the program involves or involved a practicum. O. Reg. 187/13, s. 1.

(2) In addition to the information requested under subsection (1), the Superintendent may require that private career colleges provide the following information about their graduates:

1. The graduates' dates of graduation.

2. The term or semester in which the graduates graduated.

3. The pass rate for the program. O. Reg. 187/13, s. 1.

Purpose for collection of information
36.2 **(1)** The Superintendent may collect the information referred to in section 36.1 solely for the purpose of developing performance indicators. O. Reg. 187/13, s. 1.

(2) The Superintendent shall ensure that,

(a) for the benefit of the public, the information on the performance indicators is published; and

(b) the information is published in an aggregate form so that individuals cannot be identified. O. Reg. 187/13, s. 1.

Posting information
36.3 For the purpose of the notice required by subsection 39 (2) of the *Freedom of Information and Protection of Privacy Act*, the Superintendent shall post public notice of the collection of information under section 36.1 on the Ministry's website. O. Reg. 187/13, s. 1.

Appendix C: Audit Requirements for Various Fiscal Year Ends

New Deadline for 2015 KPI Audit Submissions

Beginning with the 2015 collection cycle, the Superintendent has decided to move to a one-time per year audit requirement for all PCCs. All PCCs must submit their 2015 KPI Audit by September 1, 2016:

- **PCCs that participated in previous KPI cycles:** all 2015 enrolment and graduate data files must be audited by September 1, 2016; <u>any 2014 files that were not audited by the PCC's 2014 renewal deadline must be audited by its 2015 renewal deadline.</u>
  - o PCCs with fiscal year-ends falling between January 31 and March 31 will be required to submit an audit report covering all 2014 enrolment/graduate files by their next renewal of registration date in 2015.
  - o PCCs with fiscal year-ends falling between April 30 and September 30 will still be required to submit an audit report by their next renewal of registration date. However, these audit reports will only cover enrolment/graduate files for terms that have not already been audited.
- **PCCs participating in KPIs for the first time starting July 1, 2015**: all 2015 enrolment and graduate data files <u>and all historical data files</u> must be audited by September 1, 2016.

For the 2016 collection cycle, all PCCs will be required to submit their audit reports by September 1, 2017.

Requirements for First Time Reporters

Historical Data: This is the first year that all registered PCCs in Ontario are required to participate in the KPI initiative. For PCCs participating in the KPI initiative for the first time, the 2015 Winter Term must include all entrants and graduates who enrolled in/graduated from a PCC's vocational program over the **past** period of time representing 200% duration of the PCC's longest vocational program as of January 1, 2015. Auditors must review this historical data when auditing New OSAP PCCs' 2015 Winter Term data.

For auditors of private career colleges that did not participate in the 2014 KPI collection cycle (first time reporters), please ignore reference to the 2014 Winter, Summer and Fall Terms below. First time reporters are required to have their historical data audited as part of their "2015 Winter Term".

Requirements for Repeat Reporters (OSAP-approved PCCs)

The following are deadlines for PCCs, by fiscal year end, that have participated in KPIs prior to the 2015 collection cycle:

Fiscal Year-End	2015 Renewal of Registration Deadline	2015 KPI Audit Requirements	
		Due by 2015 Renewal Deadline	Due by September 1, 2016
January 31	July 30, 2015	• All 2014 Winter, Summer, Fall Files	• All 2015 Winter, Summer, Fall Files
February 28	August 27, 2015	• All 2014 Winter, Summer, Fall Files	• All 2015 Winter, Summer, Fall Files
March 31	September 27, 2015	• All 2014 Winter, Summer, Fall Files	• All 2015 Winter, Summer, Fall Files
April 30	October 27, 2015	• 2014 Summer, Fall Files	• All 2015 Winter, Summer, Fall Files
May 31	November 27, 2015	• 2014 Summer, Fall Files	• All 2015 Winter, Summer, Fall Files
June 30	December 27, 2015	• 2014 Summer, Fall Files	• All 2015 Winter, Summer, Fall Files
July 31	January 27, 2016	• 2014 Fall Files	• All 2015 Winter, Summer Fall Files
August 31	February 27, 2016	• 2014 Fall Files	• All 2015 Winter, Summer, Fall Files
September 30	March 29, 2016	• 2014 Fall Files	• All 2015 Winter, Summer, Fall Files
October 31	April 29, 2016	• None – (2014 Files already audited)	• All 2015 Winter, Summer, Fall Files
November 30	May 29, 2016	• None – (2014 Files already audited)	• All 2015 Winter, Summer, Fall Files
December 31	June 29, 2016	• None – (2014 Files already audited)	• All 2015 Winter, Summer, Fall Files

Note: Each PCC that has participated in previous years of reporting is responsible for ensuring that all of their 2014 enrolment and graduate data is audited by their next renewal of registration deadline.

Appendix D: Sample Enrolment Data File

Enrolment Data File Fields (Sections A-C, E-I, K mandatory, D, J optional, M as needed)	Width	Checking
Section A: PCC ID (all fields mandatory)		
A.1 Organization ID (as in RICC)	6	MTCU file
A.2 PCC ID (as in RICC)	6	MTCU file
A.3 Operating Name (as in RICC)	80	-
A.4 Legal Name (as in RICC)	80	-
A.5 OSAP Institution Code (as in RICC)	4	MTCU file
Section B: Entrant/Graduate ID (all fields mandatory)		
B.1 Student ID(unique, mandatory, grad data file match)[1,2]	15	Unique
B.2 Family Name (grad data file match)	40	At least 1 char
B.3 Given Name (grad data file match)	40	At least 1 char
Section C: Permanent address (all fields mandatory except apartment number)		
C.1 Permanent apartment number	5	-
C.2 Permanent street address	35	At least 1 digit
C.3 Permanent town/city	30	At least 1 digit
C.4 Permanent province/state (list)	2	Country based
C.5 Permanent postal/zip code (ananan)	10	Country based
C.6 Permanent country (CA, US, OT)	2	CA, US, OT
Section D: Local address (optional)		
D.1 Local apartment number	5	-
D.2 Local street address	35	-
D.3 Local town/city	30	-
D.4 Local province/state (list)	2	Country/blank
D.5 Local postal/zip code (ananan)	10	Country/blank
D.6 Local country (CA, US, OT)	2	CA, US, OT, blk
Section E: Telephone numbers (one number mandatory, 10 digits min)		
E.1 Permanent phone number	15	At least 10 digits
E.2 Local phone number	15	-
E.3 Other phone number	15	-
E.4 Cellphone	15	-
Section F: Demographics (all fields mandatory)		
F.1 Birth Date (yyyymmdd) (used for grad data file match)	8	yyyymmdd format
F.2 Study Visa (Y/N)	1	Y, N
F.3 Gender (Male, Female, Unknown)	1	M, F, U

F.4 Language spoken (English, French, Other)	1	E, F, O
F.5 Accommodation required (Sighted (S), Hearing (H), None/Other (N))	1	S,H, N

Section G: Funding Status (all fields mandatory)

G.1 OSAP funding (Y, N)	1	Y, N
G.2 Funding status (Valid codes I, S, W, L, N, O, T, P)	1	I, S, W, L, N, O, T, P

Section H: Program start date (all fields mandatory) (only those exceeding Grace Period reported)

H.1 Program start year (yyyy)	4	yyyy format
H.2 Program start term (S, F, W)	1	S,F,W format
H.3 Program start month and day (mmdd)	4	mmdd format

Section I: Program of instruction (each program; all fields mandatory)

I.1 Approved program name (as in RICC)	105	MTCU file
I.2.Program duration HH (hours, as in RICC)	4.2	nnnn.dd
I.3 Program duration WK (weeks, as in RICC) (3.2) (nnn.dd)	3.2	MTCU file
I.4 Program format (FT, PT, FT/PT, as in RICC)	5	FT, PT, FT/PT
I.5 Work integrated learning (as in RICC – Practicum (PR), No Practicum (NO))	2	PR, NO
I.6 Campus postal code (ananan)	6	ananan

Section J: College program of instruction info (all fields optional)[3]

J.1 Program name (as referred to by the PCC)	40	-
J.2.College program code (if available)	15	-
J.3 College division/school/faculty (if available)	15	-
J.4 Campus location code (if available)	15	-

Section K: E-mail addresses (external address is recommended[4], internal address is optional)

K.1 External e-mail address (mandatory)	40	@ character
K.2 Internal e-mail address (optional)	40	-

Section M: Transfer Students (all fields mandatory)

M.1 Transfer status (Y = yes, N/ blk = no)	1	Y, N/blk
M.2 Name of program transferred from (as in RICC, blk)	105	MTCU file, blk

Notes:

[1] In order to match entrants in the enrolment file with graduates in the graduate data file, a unique student number is required. If your PCC does not assign student numbers, please assign unique student numbers to each entrant in this file. You can use any numbering system that you wish as long as it creates a unique number for each entrant. You will have to provide the same number in the graduate data file when the entrant graduates.

[3] These fields are optional but if provided will allow Forum to report back to each PCC their results by PCC program name, PCC program code, PCC division/school/faculty and campus location. These breakdowns are not required for KPI reporting purposes and will not be provided to the ministry.

[4] This field is recommended as it will help Forum contact Hard-to-Find Graduates.

Appendix E: Sample Graduate Data File

Graduate Data File Fields (Sections A-C, E-H, N mandatory, D, K-L optional)	Width	Checking
Section A: PCC ID (all fields mandatory)		
A.1 Organization ID (as in RICC)	6	MTCU file
A.2 PCC ID (as in RICC)	6	MTCU file
A.3 Operating Name (as in RICC)	80	-
A.4 Legal name (as in RICC)	80	-
A.5 OSAP Institution Code (as in RICC)	4	MTCU file
Section B: Entrant/Graduate ID (all fields mandatory)		
B.1 Student ID (unique, mandatory, enrolment data file match)[1,2]	15	Unique
B.2 Family name (enrolment data file match)	40	At least 1 char
B.3 Given name (enrolment data file match)	40	At least 1 char
Section C: Permanent address (all fields mandatory except apartment number)		
C.1 Permanent apartment number	5	-
C.2 Permanent street address	35	At least 1 digit
C.3 Permanent Town/city	30	At least 1 digit
C.4 Permanent province/state (list)	2	Country based
C.5 Permanent postal/zip code (ananan)	10	Country based
C.6 Permanent country (CA, US, OT)	2	CA, US, OT
Section D: Local address (optional)		
D.1 Local apartment number	5	-
D.2 Local street address	35	-
D.3 Local town/city	30	-
D.4 Local province/state (list)	2	Country/blank
D.5 Local postal/zip code (ananan)	10	Country/blank
D.6 Local country (CA, US, OT)	2	CA, US, OT, blk
Section E: Telephone numbers (one number mandatory, 10 digits min)		
E.1 Permanent phone number	15	At least 10 digits
E.2 Local phone number	15	-
E.3 Other phone number	15	-
E.4 Cellphone	15	-
Section F: Demographics (all fields mandatory)		
F.1 Day of birth (yyyymmdd) (must match previous enrolment file)	8	yyyymmdd format

F.2 Study Visa (Y/N)	1	Y, N
F.3 Gender (Male, Female, Unknown)	1	M, F, U
F.4 Language spoken (English, French, Other)	1	E, F, O
F.5 Accommodation required to do the survey (Sighted, Hearing, None/Other (N))		
	1	S, H, N

Section G: Funding Status (all fields mandatory)

| G.1 OSAP funding (Y, N) | 1 | Y, N |
| G.2 Funding status (Valid codes I, S, W, L, N, O , T, P) | 1 | I, S, W, L, N, O, T, P |

Section H: Graduation date (all fields mandatory)

H.1 Graduation year (yyyy)	4	Yyyy format
H.2 Graduation term (PCCs)(S, F, W)	1	S,F,W format
H.3 Graduation month and day (mmdd)		
	4	Mmdd format

Section K: E-mail addresses (external address is recommended[2])

| K.1 External e-mail address (mandatory) | 40 | @ character |
| K.2 Internal e-mail address (optional) | 40 | - |

Section L: Employer (all fields optional)[3]

Employer organization name	40	-
Employer suite number	5	-
Employer street address	35	-
Employer town/city	30	-
Employer province/state (list)	2	-
Employer postal/zip code (ananan)	10	-
Employer country	2	-
Supervisor family name	40	-
Supervisor given name	40	-
Supervisor title	35	-
Supervisor phone number	15	-
Supervisor phone extension	7	-

Section N: Program of instruction (each program; all fields mandatory)

| N.1 Approved program name (as in RICC) | 105 | MTCU file |

Notes:

[1]Must match the student identification number provided in the enrolment file.
[2]The external e-mail addresses is recommended as it will help Forum reach Hard-to-Find Graduates.

[3]Employer information is requested in order to conduct the employer survey. If available, this information will considerably shorten the survey length for graduates.

Appendix G: Contact Information

For questions regarding your **data uploads or the audit process,** please contact, Forum Research Inc.:

Lorne Bozinoff, Ph.D.
President
Forum Research Inc.
180 Bloor Street, Suite 1400
Toronto, Ontario
M5S 2V6

Telephone: 1-866-206-7660
E-mail: pcckpi@forumresearch.com
Website: www.forumresearch.com
PCC KPI Website: www.pcckpi.ca

For any **policy related questions** regarding KPIs and the audit of enrolment and graduate data, please contact the Ministry of Training, Colleges and Universities: PCCKPI-Policy@ontario.ca

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