



## Frequently Asked Questions on the Post-Secondary Education Program

*Please refer to the Indian and Northern Affairs Canada (BC Region) Education Programs and Services Handbook (2005) for more detailed information.*

*All references below to the “National Program Guidelines” refer to the INAC Post-Secondary Education National Program Guidelines (2003).*

### Administration Costs

- Q:** What portion of Post-Secondary Education (PSE) funding allocation can be used for administration of the program?
- A:** Program administration expenses such as rent, telephone, mailing etc. are not eligible expenses under the PSE Program. These expenses may be paid out of Band Support Funding, which includes a component for post-secondary program administration. Wages for post-secondary coordinators may be paid out of the PSE Program, provided the wages cover time spent tutoring, guiding or counseling eligible students who are attending eligible post-secondary programs (see Guidance and Counseling below).

### Adult Graduation Diploma / BC Adult Graduation Diploma

- Q:** What is required for a BC Adult Graduation Diploma?
- A:** A student must be 19 years of age or over and must earn at least 20 credits in the secondary system or complete 5 courses in the post-secondary system (College ABE Program). For more information and a list of required courses, visit [www.bced.gov.bc.ca/adult\\_graduation/diploma.htm](http://www.bced.gov.bc.ca/adult_graduation/diploma.htm).
- Q:** Can UCEP be used to fund a student for their BC Adult Graduation Diploma?
- A:** Only if the diploma is required for their admission to a specific eligible program at an eligible post-secondary institution.
- Q:** Where can a student get funding for Adult Basic Education (ABE) if they are not eligible for the Nominal Roll?
- A:** If they are taking courses to complete grade 12, tuition is generally covered by the Ministry of Advanced Education and students can apply for grants for books and supplies, if required, through the ABE Student Assistance Program with the Ministry of Advanced Education (ABESAP) at [www.aved.gov.bc.ca](http://www.aved.gov.bc.ca) or through the Financial Aid Office at their post-secondary institution.

### Affiliation Agreement

- Q:** What is an affiliation agreement?
- A:** In the case of post-secondary programs, an affiliation agreement is an agreement between a post-secondary institution and another institution whereby the second institution offers a program on behalf of the first. This is usually done where a smaller, local private institution provides a program on behalf of a larger, public institution.



### Age Limits and Adult Upgrading

**Q:** What is the age limit for the Nominal Roll (in order to take upgrading)?

**A:** In BC there is **no** age limit. A student must meet the Nominal Roll (NR) criteria, however:

If a student is attending a Post-secondary Institution (regardless of the course) they are not eligible for Nominal Roll. If a student is taking courses required for entry into a post-secondary program, at a Post-secondary Institution, they may be eligible for University and College Entrance Program (UCEP) funding.

### Appeals

**Q:** Can a student appeal a decision of their community to INAC or request direct PSE funding (from INAC)?

**A:** No. INAC funding is distributed to First Nations communities and administering authorities, who then distribute the funds to the students, based on INAC program guidelines, which note that the First Nation administering authority must have an appeal process in place. In the event that an administering authority did not have an appeal process in place, or if a student could not access it, INAC would consider further inquiry.

### Bonuses, Incentives

**Q:** Can I give my students a Christmas bonus?

**A:** No. If you are not already paying the maximum living allowance, you could give a living allowance top-up that would keep the students' total living allowance payments for December within the maximum allowable in their particular circumstance (refer to the annual Canada Student Loans monthly student living allowances chart)

**Q:** Can I provide my students with incentives?

**A:** Yes. See pages 11 and 12 of the Post-Secondary Education National Program Guidelines (2003). There are several types of incentives and scholarships that are allowable expenditures. The amounts are subject to maximums which vary from \$1000 to \$3500, and are subject to certain restrictions related to the number of students that can receive them, area of study and grade point average.

### Canada Student Loans

**Q:** Do students need to declare their INAC funding to Canada Student Loans? (ie. if a student is "topping up" their INAC funding with Canada Student Loans)

**A:** Yes. Canada Student Loans (CSL) is an income tested program and as such, students must follow the rules established under the program regarding multiple sources of funding. In addition, the student may only "top up" their INAC funding to meet the CSL maximums. In other words, a student may not "double up" their living allowance.



- Q.** If all our Band post-secondary funds are not expended by March 31st, could we use them to pay off student loans?
- A.** No, eligible expenditures do not include direct payments to Canada Student Loans. However, if your eligible students have not received the maximum monthly living allowances, you could use funds from the current year to top them up to the maximum, providing this was included in your Local Operating Policy.

Eligible expenditures are for tuition, compulsory fees, books, travel and living allowance. The only way you could assist to pay a student loan would be to pay (the student) the eligible expenditures in the same year they occurred and the student could pay that part of the loan.

### **Comparable Program**

- Q:** What is the best way to demonstrate that a program is not “comparable” re: travel or tuition expenses?
- A:** Keep a copy of the program profiles on the student’s file to demonstrate that the nearest program is not comparable to the program chosen. You may also seek written clarification from the institution(s) in question.

### **Compliance Reviews**

- Q:** What is the compliance directive for INAC’s Education Programs?
- A:** The compliance directive has been developed to guide regular departmental reviews of First Nation, Inuit, third party and, in some cases, INAC delivery of the department’s education programs. It is intended to ensure that the terms and conditions of the programs and services are being met, funding criteria are being properly applied, funds are properly expended on the purposes for which they were allocated, and the department’s accountabilities to Parliament are satisfied. INAC has developed the compliance directive for its education programs in order to support the overall quality of First Nation and Inuit education and support the responsible use of public funds.

### **Contingency Funding**

- Q:** Is there a limit to the amount a First Nation can set aside for contingency funding within a fiscal year?
- A:** No.
- Q:** What is contingency funding?
- A:** Under the National Program Guidelines, contingency funding is meant to be funding designated to be held-back for the purpose of assisting a student with emergency costs such as travel home for a funeral. The administration and priority for this funding are to be outlined in the Local Operating Policy. This funding should be spent by the fiscal year-end (ie. it should not accumulate).
- Q:** Can I use my Contingency Funds by March 31 to top-up funded students?
- A:** Yes, within the National Program Guidelines limits. If you have not already paid the maximum for living allowance, you may use left-over Contingency Funds to



provide the students with amounts up to the equivalent of the maximum living allowance for the year. Alternatively, if you have not already distributed bonuses or incentives, you might use the Contingency Funds for that purpose, as per the National Program Guidelines.

**Q:** How can I separate contingency funding from surplus?

**A:** Contingency funding should be spent by year-end so that it is not part of a surplus. A First Nation administering authority may distribute any left-over contingency funding on other eligible expenditures by March 31, and then identify a new contingency fund from their new budget on April 1.

### **Co-op/ Co-operative Education and Practicum**

**Q:** Can I pay tuition and fees for Co-operative Education terms?

**A:** Yes, if the student will receive credit toward their diploma or degree for the term.

**Q:** Can I provide living allowance, etc. during a co-op or practicum placement?

**A:** Yes, if these placements are required as part of the program.

**Q:** Can I pay for a student to travel to their practicum or co-op placement?

**A:** Only if the practicum is required as part of their program and if the costs are included within the limits of the living allowance maximums, or within their allowable seasonal travel limits.

Refer to the INAC information sheet on Co-operative Education.

### **Correspondence/ Distance Education**

**Q:** Can a student be funded for living allowance if they are taking correspondence/ distance education?

**A:** Yes, provided it is an eligible, full-time program being offered through an eligible institution. The living allowance limits etc. would apply as per the guidelines for full-time students.

### **Daycare Eligibility/ Students with Dependents**

**Q:** Can I fund daycare costs for a student?

**A:** Not unless these costs are included within their living allowance maximums, as per Canada Student Loans. Visit [www.bcsap.bc.ca](http://www.bcsap.bc.ca) for information on Canada Study Grants for Students with Dependents (currently up to \$1,920 per student per program year).

Daycare support for students may be available through the Health Canada *Head Start Program* or the Service Canada *First Nation and Inuit Childcare Initiative* (contact your local AHRDA - Aboriginal Human Resource Development Agreement organization).

### **Dependents**

**Q:** What is the definition of dependent?



- A:** The PSE National Program Guidelines do not define this but simply reference the Canada Student Loan maximums. Canada Student Loans defines a dependent as someone for whom you receive the Canada Tax Child Benefit, claim a deduction on your federal income tax return, or for whom you have in law or in fact, custody and control.

### Eligible Expenditures

- Q:** Can I pay for a student's damage deposit?

- A:** Yes, as long as it is included within the living allowance limits. It is part of rental costs.

- Q:** Can I pay for a computer for a student?

- A:** In some cases. It would need to be required by their program and included within the books and supplies limit of \$2000 per student per year. This would apply for any special supplies or equipment for their specific program, such as aprons, workboots, software, textbooks, etc.

- Q:** Can I pay for graduation costs for a student?

- A:** The National Post-Secondary Guidelines do not address this specific use of funds. However, funds remaining from the Band's Post-Secondary dollars may be used for purposes other than funding students if all students that are eligible for PSE funding and request it have been funded to the maximum allowance for living expenses and required fees. Any remaining funds deemed surplus may be used for other purposes such as year-end -graduation ceremonies. Please ensure to include appropriate documentation for your records.

### Employment (for graduates)

- Q:** What programs help new First Nations graduates with employment?

- A:** The Public Service Commission hosts an *Aboriginal University Recruitment Inventory* for government jobs and lists job postings at [www.aboriginalcanada.gc.ca](http://www.aboriginalcanada.gc.ca) and [www.youth.gc.ca](http://www.youth.gc.ca). Aboriginal Human Resource Development Agreements may also provide funding for training on the job and summer employment.

### Exceptions

- Q:** Can I make an exception to the limits under the National Program Guidelines (for example, if I have a student with special circumstances)?

- A:** There is no process for exceptions to the program guidelines. If you receive funding on an annual, Flexible Transfer Payment (FTP) basis, and you do not have waitlisted students/ eligible students who have not yet been funded, you can choose to make exceptions/ pay for ineligible expenses.

Although FTP funds may be spent on other things once minimum program terms and conditions have been met, any funds that are spent on ineligible education expenses may impact future year allocations.



### Full Time Requirements

**Q:** What is considered full-time for upgrading?

**A:** A 60% course load is considered full-time, as it is for all Post-secondary Student Support and UCEP funding. How many courses are considered to make up a 60% load will vary by program so it is best to confirm with the institution.

**Q:** Are there exceptions for Special Needs Students?

**A:** INAC accepts the institutions definition of full-time status (normally considered a 60% course load) but some institutions may adjust this for students with disabilities; the BC Student Assistance Program will accept a 40% course load as full-time for permanently disabled students. Visit [www.bcsap.bc.ca](http://www.bcsap.bc.ca) for more information on loans and grants for students with permanent disabilities.

### General List Students/ Students without Band Membership

**Q:** If a student has status but not band membership, where can they apply for INAC post-secondary funding?

**A:** The Native Education College ([www.necvancouver.org](http://www.necvancouver.org)) administers a portion of the Post Secondary Student Support Program for INAC, BC Region. Students from the following categories are eligible to apply for this funding:

1. Northwest Territory members (including Inuit) who do not meet Northwest Territory residency and now reside in British Columbia;
2. British Columbia registered members who do not have Band membership or an affiliation with a Band (BC General List);
3. Non-band members who are affiliated with a BC First Nation (affiliation as indicated on Status Card); and
4. Inuit - Nunavut Inuit should visit the Financial Assistance for Nunavut Students (FANS) website at [www.gov.nu.ca/education/eng/adult/fans/index.htm](http://www.gov.nu.ca/education/eng/adult/fans/index.htm) to determine whether to apply through FANS or the NEC, depending on their residence information.

INAC BC Region does not retain any funding for direct applications. For information about INAC post-secondary funding arrangements in other regions/ provinces, please call our office at 1-800-665-9320 for a list of contacts.

### Graduation

**Q:** Are graduation expenses eligible?

**A:** No, not unless the graduation fees are included within the compulsory student fees.

### Guidance and Counseling

**Q:** Are there specific limits attached to this expense?

**A:** No. Prior to 2003, administering authorities were able to spend a maximum of 7% of their budgets on tutorial, guidance and counseling services for students enrolled in PSE programs. That limit was removed in 2003.

### Inquiries



- Q:** Who do we contact at INAC if we have questions about our funding?  
**A:** The Funding Services Officer assigned to your community/ administering authority. (Funding Services Reception 604-666-5171)

### **Level Limits**

Please see page 7 of the National Program Guidelines as the limits are complex.

- Q:** What expenses are included within the Level Limits?  
**A:** Living allowance and travel are included; there are no limits to how long or how often you provide a student with funding for tuition, fees and books.
- Q:** Can a student's living allowance be funded for a second certificate?  
**A:** No. The guideline states that you may only be funded for living allowance and travel for one program under each Level, however, tuition, compulsory fees and required books may be funded for more than one program.
- Q:** Can a student's living allowance be funded for a second program at Level II (undergraduate level)?  
**A:** Only if the first program is required as a pre-requisite for the second. (Post-baccalaureate degrees, law degrees and teaching degrees would be examples of where an undergraduate degree is required as a pre-requisite but where the programs are not considered Level III or post-graduate programs.)
- Q:** Can a student change programs and still be funded under the same Level?  
**A:** Yes, but the time used toward the first program will count against the time allowed for the second program.

If a student is registered in a program with multiple exit points (for example, they can complete with a certificate after one year or a diploma after two years), ensure that they are aware that they could complete the diploma under Level 1 if they attend continuously, rather than exiting after a certificate and then deciding later to seek the diploma.

### **Living Allowance**

- Q:** Can I pay a summer student living allowance?  
**A:** To be considered eligible for living allowances, a student must be enrolled in at least a 60% workload (considered full-time). If a student is attending full-time during the summer, they would be eligible. Keep in mind the total funding limits per student per year for each Level.

### **Local Operating Policies**

- Q:** Do I have to update my Local Operating Policy to address the 2003 National Program guidelines?  
**A:** Yes, but this should only require minor revisions as there have been few changes since 1989. At a minimum, Local Operating Policies need to address



prioritization for eligibility, a student appeal process and criteria for emergency contingency funding.

### **Maximum Funding Amounts**

**Q:** Do we have to fund students to the Canada Student Loan amounts?

**A:** No. First Nations Administering Authorities can choose to fund **up to** the maximum amounts or they can fund lesser amounts. They can also choose whether to make full-time or part-time students the priority for funding. Prioritization and funding amounts is up to individual communities as long as they stay within the Canada Student Loan maximums.

### **On-line Courses**

**Q:** Are students taking on-line courses eligible for living allowance?

**A:** Yes, if their total course load is considered full-time and if the on-line courses are part of an eligible program and offered by an eligible institution.

### **Post-baccalaureate Programs**

**Q:** Where does a post-baccalaureate program fit into the program guidelines?

**A:** A post-baccalaureate program generally refers to a program that requires a bachelor's degree as a pre-requisite. If this is the case, this type of program would be considered a Level II and a student could receive full funding, including living and travel expenses, given that the program requires completion of the first Level II. This would be similar to a law or teaching degree where a bachelor's degree is a pre-requisite.

### **Post-Secondary Education (PSE) Budget**

**Q:** How much of the annual PSE funding goes to students and/or communities in BC?

**A:** All of it. INAC has a separate budget for INAC staff and operations etc.

**Q:** Are there limits to how much of a community's PSE funding can be used for counseling (ie. PSE Coordinator wages and benefits)?

**A:** There are not limits on the amount, just on what it is used for. PSE funding can be used to pay the salary of the Post-Secondary Education Coordinator if that individual provides guidance, counseling, tutoring and /or academic advising for students. If that is the case, the salary must be shown on the Post-Secondary Schedule in the Audit.

**Q:** Can PSE funding be used for administration?

**A:** No. Administration costs (eg. rent, photocopying, office supplies) for post-secondary are included within Band Support Funding.

**Q:** Can PSE funding be used for student exchange programs?

**A:** Yes, for eligible programs offering credits at eligible institutions. The tuition and living allowance, part-time vs. full-time course load, and per student limits will apply, however, as per the National Program Guidelines.



### **Private Career Training Institute Agency (PCTIA)**

**Q:** When is a private school an eligible institution for INAC post-secondary funding?

**A:** A private school must be recognized by the provincial government – in the case of BC, recognized post-secondary institutions are referred to as Designated Schools and must be on the Designated Schools list at [www.aved.gov.bc.ca/studentservices](http://www.aved.gov.bc.ca/studentservices).

### **Residency**

**Q:** If a student is currently living outside of Canada, are they eligible for PSE funding?

**A:** This will depend on their particular circumstance. If they have maintained a permanent residence and address within Canada for 12 consecutive months prior to application but are traveling out of the country for some reason, they are eligible.

The residency clause applies only to the first year of study for students attending institutions outside of Canada (ie. once a student has started to receive PSE funding, he or she may make their permanent residence in the location of their educational institution and continue to be eligible.)

### **School Leaving Certificate/ School Completion Certificate**

**Q:** What does it mean to receive a leaving certificate (formally known as a School Completion Certificate)?

**A:** This means the student has not met the requirements for grade 12 graduation but has met the goals of their Individual Education Plan. This type of certificate is generally used for students with special needs or those who are on modified programs, and it is generally not accepted at post-secondary institutions for admission requirement purposes.

**Q:** If a student has a School Completion Certificate, are they eligible for UCEP?

**A:** Yes, provided the courses they take under UCEP are required for admission to a specific eligible post-secondary program.

### **Student Exchange/ Study Abroad**

**Q:** Can we sponsor a student as an exchange student with another country?

**A:** Yes, if the student is receiving credit toward his/her regular program. All eligible expense limits would continue to apply (including tuition, seasonal travel and part-time/ full-time eligibility for living allowance).

### **Students with Disabilities**

**Q:** What if a student cannot handle a full course load due to a disability?

**A:** Part-time study is funded through INAC for **books, supplies and tuition** with no time limit for **PSSSP**, therefore funding for these costs may be extended as needed. (UCEP funding is limited to up to one academic year or equivalent for all expenses, however, see UCEP questions below.)



Permanently disabled students may also qualify for full-time funding under the BC Student Assistance Program while taking a 40% course-load. Visit [www.bcsap.bc.ca](http://www.bcsap.bc.ca) for more information on loans and grants for students with permanent disabilities. Bursaries may also be available through the First Citizens Fund Student Bursary Program. Visit [www.bcaafc.com](http://www.bcaafc.com) for details.

### Supplies

**Q:** Are there restrictions on eligible supplies and books?

**A:** Yes. Supplies and books are to be required for the program and cannot total more than \$2000 per student per year. Receipts should be kept on student files. You may also wish to request the student provide a list of required materials for each course taken.

### Time Limits

**Q:** If a program is six months long but intense, does it qualify for PSSSP?

**A:** It might. You would need a letter from the institution stating that the program is equivalent to one academic year.

The amount of credits can vary greatly between programs, depending on their intensity, and it is always worth inquiring from an institution if a program is considered an academic year, or not. Normally, a program will be 8 months long to be considered an academic year, although exceptions do exist, including programs where the student attends classes 7 hours per day for 4 months.

**Q:** Can I use PSSSP to fund a student for a six-week apprenticeship program?

**A:** No. You will need to approach your local Aboriginal Human Resources Development Agreement (AHRDA) organization (or Employment Insurance) for any programs that are less than one academic year or that do not require Grade 12 or equivalent.

**Q:** Can I use emergency contingency funding to fund a 6<sup>th</sup> year of living allowance for a degree program?

**A:** No.

**Q:** Does UCEP count against PSSSP maximum time or funding limits?

**A:** No, the programs and their limits are separate.

### Trades Training

**Q:** Are trades eligible for PSSSP?

**A:** Sometimes. Some trades programs will fit within Post-Secondary Student Support Program eligibility but many do not meet the academic year requirement, particularly in the case of traditional apprenticeship training. Increasingly, however, trades programs are requiring completion of grade 12 and some of these do meet the academic year requirement. It is worth completing some detailed research as programs can vary between institutions, even within a trade



(for example, some carpentry programs at BCIT are eligible and some are not).  
(See the INAC information sheet on this topic.)

If a trades program is not eligible for PSSSP, approach your Aboriginal Human Resource Development Agreement (AHRDA) organization or contact the Industry Training Authority of BC at [www.itabc.ca](http://www.itabc.ca). If the program is at least 12 weeks in length, it may qualify for Canada Student Loans or for Employment Insurance programs.

### Transcripts

**Q:** Are transcripts an eligible expense?

**A:** No – unless they are included within compulsory student fees.

### Travel

**Q:** What if a student needs to come home for a death or another emergency?

**A:** Your Emergency Contingency Funding is meant to address this kind of issue. The twice per year limit is for regular seasonal travel (eg. Christmas, summer holidays).

### UCEP

**Q:** If the UCEP program is limited to one academic year, what does that mean?

**A:** The student may take Adult Basic Education (ABE) courses under the UCEP program, provided these are documented as required for the academic level necessary for entrance to the degree or diploma program they intend to pursue. In order to qualify as full-time they must take a 60% course load (by year or by semester, depending on how program is organized). Part-time students may complete their required courses over whatever period is required (ie. “The equivalent of one academic year” is defined by the institution and may vary in the number of months.)

### Notes:

ABE courses are eligible IF they are required for entrance into a specific post-secondary program (as stated in a letter from the post-secondary institution offering the program). UCEP is not to be used for high-school graduation, unless this is a requirement of the post-secondary program.

The summer semester can be used to spread the courses over 3 semesters but keep the 60% load in mind for living allowance and travel funding eligibility.

If in doubt, have the institution provide a letter confirming that the courses being taken are less than or equal to one academic year.

Students who started UCEP programs that were longer than one year before September 2004 may be funded to complete their program, as originally set out. This will require documentation of the original program plan.



- Q:** If a student switches programs, can they go back for any required upgrading and be funded through UCEP again?
- A:** Yes, as long as the total UCEP support they receive is no more than the equivalent of one academic year. If they have already been supported for one year, they cannot be supported again.
- Q:** Can UCEP be used to fund a bridging program if the program is two years long?
- A:** No, not unless it is a part-time program equivalent to one academic year (or less). In addition, any program funded under UCEP is to provide specific academic courses (example English 12 and Math 11) to prepare a student for a specific diploma or degree program.
- Q:** What is the difference between Adult Basic Education (ABE) and Kindergarten to Grade 12 (K-12)?
- A:** ABE courses are offered by the Ministry of Advanced Education, are recorded on the Post-Secondary Student Registry (PSSR) and are eligible for UCEP funding. K-12 are offered by the Ministry of Education, are recorded on the Nominal Roll and are not eligible for UCEP funding.
- Q:** Can I use UCEP or PSSSP for specific occupational skills training, training on the job or basic literacy?
- A:** No. There are other programs that provide funding for this type of education, subject to eligibility. These include the Training and Employment Support Initiative (TESI) that assists social assistance recipients in developing the skills to enter vocational training, educational programs, or employment, and Aboriginal Human Resource Development Agreement (AHRDA) holders that provide short-term training and training on the job.
- Q:** Can UCEP be used for grade 10 courses?
- A:** Yes, if the courses are required for admission to a specific eligible post-secondary program and are offered at (or in partnership with) an eligible post-secondary institution. (There may not be many circumstances where this would occur but UCEP is not limited to grade 11 and 12 courses. A recent example included a UCEP-eligible trades preparation program where Math 10 was included along with Math 11 within the one-year program. The specific post-secondary program being prepared for required high school completion, including Math 11.)
- Q:** Can UCEP be used to complete a Dogwood Certificate?
- A:** Only if the Dogwood Certificate is required for admission to a specific eligible post-secondary program and if the required courses can be completed within the one academic year time limit. The courses would also need to be taken at an eligible post-secondary institution.