

RESEARCH REPORT

Micro-certifications: Policy and Regulatory Context in Ontario

Prepared for eCampusOntario by Peter Gooch and Associates

February 20, 2020

About eCampusOntario

eCampusOntario, a not-for-profit corporation, is funded by the Government of Ontario to be a centre of excellence in online and technology-enabled learning for all publicly-funded colleges and universities in Ontario.

About this Report

This report analyses the current regulatory framework in Ontario—the set of policies and directives of the Ministry of Colleges and Universities, and the various provincial-level quality assurance processes—as the framework applies to micro-certifications. The report is intended to provide information to colleges and universities about how the current framework enables or might constrain the use of micro-certifications.

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Readers are invited to send comments about omissions, clarifications or corrections of the report to info@petergooch.ca.

Addendum to Research Report

August 31, 2021

The original survey of policy and regulatory context in Ontario for micro-certifications did not include Indigenous Institutes and was limited to only colleges and universities. Indigenous Institutes are a vital pillar of Ontario's post-secondary education landscape. Indigenous Institutes are located throughout the province and offer a culturally relevant education for their students and act as a gathering space for communities. Every Indigenous Institute is unique, offering a variety of opportunities from Indigenous language and culture classes to apprenticeship programs and much more, all which reflect the needs and desires of their communities.¹

The *Indigenous Institutes Act*, 2017 came into effect on December 14, 2017 and affirmed the Government of Ontario's commitment to reconciliation.² Through the *Indigenous Institutes Act*, the scope, impact, and relevancy of Ontario's nine Indigenous Institutes was enhanced by enabling Indigenous Institutes to grant credentials, such as diplomas, degrees and certificates, after undergoing a quality assurance process. The *Indigenous Institutes Act*, 2017 also led to the creation of an Indigenous quality assurance council called the Indigenous Advanced Education and Skills Council (IAESC).³ As of August 2021, Indigenous Institutes are granting credentials through one or both of the following mechanisms: 1) via partnerships with colleges and universities; 2) through accreditation by IAESC. To learn more about Ontario's Indigenous Institutes, please visit this website: <https://www.ontario.ca/page/indigenous-institutes>.

In March 2021, the Indigenous Institutes Consortium (IIC) published a report entitled [Microcredentialling Framework & Virtual Learning Strategy Foundations](#)⁴ which explores:

1. The background, context, and potential of a microcredentialling framework for Ontario Indigenous Institutes
2. An Indigenous approach to virtual learning, including pedagogical and methodological considerations
3. Recommendations and applications for virtual learning across Ontario Indigenous Institutes.

It is strongly recommended that readers also consider the IIC report (above) as an important component of the policy and regulatory context for microcredentials in Ontario. eCampusOntario is working to ensure future reports include Indigenous Institutes as an equal and third pillar in the Ontario postsecondary system.

¹ Indigenous Institutes. <https://www.ontario.ca/page/indigenous-institutes>. Published October 9, 2019. Accessed August 11 2021.

² *Indigenous Institutes Act*, SO 2017, c 35 s 20, <https://www.ontario.ca/laws/statute/17i34a>. Accessed August 11 2021

³ *Indigenous Institutes Act*, SO 2017, c 35 s 20, <https://www.ontario.ca/laws/statute/17i34a>. Accessed August 11 2021.

⁴ Microcredentialling Framework & Virtual Learning Strategy Foundations. <https://iicontario.ca/wp-content/uploads/2021/07/IIC-MicroCredentialling-v4.pdf>. Published March 30, 2021. Accessed August 23 2021.

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Purpose

Colleges and universities in many jurisdictions have shown increasing interest in the use of micro-certifications as a means to help students and graduates demonstrate skills and competencies in ways that are relevant to employers.

eCampusOntario has been funded by Ontario's Ministry of Colleges and Universities (MCU) to support the work of Ontario's publicly assisted colleges and universities in the development and implementation of micro-certifications. To date, eCampusOntario has developed principles and a framework for micro-certifications,⁵ funded fourteen pilot projects at colleges and universities and with industry partners, and funded research on business models supporting implementation of micro-certifications in other jurisdictions.

eCampusOntario has also commissioned this report.

This report's purpose is to analyse the current regulatory framework in Ontario—the set of policies and directives of the Ministry of Colleges and Universities, and the various provincial-level quality assurance processes—as that framework applies to micro-certifications. The report is intended to provide information to colleges and universities about how the current framework enables or might constrain the use of micro-certifications.

The focus of the paper is on the *external* regulatory framework, established by the provincial government and provincial quality assurance processes. Each college and university has its own *internal* policies that are also relevant to how micro-certifications could be used. The current array of relevant internal policies differs widely among institutions and, as a result, is out of scope of this analysis.

Also, some programs at colleges and universities are subject to accreditation by external professional or industry bodies. The policies of accrediting bodies may also be relevant to the use of micro-certifications. Again, given the variability and complexity of potentially relevant policies, accreditation requirements are also outside the scope of this analysis.

A caution:

This report is an analysis and interpretation of the policy and regulatory framework.

This report has **not** been approved by the Ontario Ministry of Colleges and Universities, and **not** been approved by the various provincial quality assurance entities discussed in the report.

As a result, while the report is intended to help colleges and universities assess options, it should not be relied on as the basis of institutional directions or decisions.

⁵ The micro-certification principles and framework can be found at <https://www.ecampusontario.ca/micro-certifications/> (accessed, January 2020).

Readers are invited to send comments about omissions, clarifications or corrections of the report to info@petergooch.ca.

Overview

The external regulatory framework for colleges and universities addresses a range of issues that are potentially relevant to the use of micro-certifications:

1. Authority to award credentials
2. Credentials
3. Operating grants
4. Tuition
5. Ancillary fees
6. OSAP
7. Program approvals and reviews by provincial quality assurance bodies
8. Program funding approvals by the Ministry of Colleges and Universities
9. Funding linked to experiential learning

Each of these issues is addressed in sections of the report.

The report concludes with two tables that summarise the findings concerning the applicability of these policy and regulatory issues as they apply to micro-certifications.

Definitions

It is important to set out definitions of some terms used throughout the report.

Micro-certification	Micro-credentials certify an individual's achievements in specific skills and differ from traditional education credentials, such as degrees and diplomas, in that they are shorter, can be personalised and provide distinctive value and relevance in the changing world of work. ⁶
Colleges	Colleges of Applied Arts and Technology, funded by the Ontario Ministry of Colleges and Universities.

⁶ This definition is based on that of the RMIT University in Australia and the definition used by eCampusOntario.

Credential	A credential awarded at the completion of a program of study that is recognised by the provincial government’s Ontario Qualification Framework.
Credit-bearing	A unit of study that contributes toward (or could contribute toward) completion of the requirements of a credential recognised by the provincial government’s Ontario Qualification Framework.
MCU	Ontario Ministry of Colleges and Universities.
Not-for-credit	A unit of study or work or participation that does not itself contribute toward completion of the requirements of a credential recognised by the provincial government’s Ontario Qualification Framework.
PLAR	Prior Learning Assessment and Recognition—a formal process to evaluate whether and the extent to which prior learning or experience of a learner can be recognised as credit towards a credential.
Program	A sequence of courses or other units of study prescribed by an institution for the fulfillment of the requirements of a particular degree, diploma or certificate. ⁷
Universities	Universities in Ontario that directly receive operating grants from the Ontario Ministry of Colleges and Universities.

1. Authority to award credentials

This section addresses two issues relevant to the authority and recognition of postsecondary credentials in Ontario: the source of institutions’ authority to award credentials, and limits (or lack of limits) on nomenclature of credentials.

Colleges

The *Ontario Colleges of Applied Arts and Technology Act, 2002* does not address credentials that may be awarded by colleges. The act specifies the colleges’ objects—the purposes for which they are established—and it empowers the responsible Minister to set binding policy directives “in relation to the manner in which colleges carry out their objects or conduct their affairs”.⁸

The Ministry of Colleges and Universities governs college programs of instruction through binding policy directives. A primary one is the Binding Policy Directive: Framework of Instruction.⁹ The

⁷ From MCU’s Ontario Operating Funds Distribution Manual 2009-10 for universities.

⁸ Section 4(1).

⁹ Found at <http://www.tcu.gov.on.ca/pepg/documents/FrameworkforPrograms.pdf> (accessed January 2020).

directive specifies (among other requirements) that colleges are to deliver programs of instruction leading to an Ontario College Certificate, Ontario College Diploma, Ontario College Advanced Diploma, or Ontario College Graduate Certificate that conform to the Ontario Qualifications Framework (discussed below). Colleges also have authority to award credentials approved by their boards of governors (discussed below).

Colleges may also gain authority to offer degree programs from the Minister of Colleges and Universities, through a process established in the *Post-secondary Education Choice and Excellence Act, 2000* that requires review by Postsecondary Education Quality Assessment Board (PEQAB). Approvals of degree programs are time-limited, and colleges must apply again for approval to continue a degree program.¹⁰

Universities

The authority of universities in Ontario to award credentials is established by each university's statute.¹¹

The acts typically provide that the university may grant degrees, including honorary degrees, diplomas and certificates.¹²

Limits on nomenclature of credentials

The binding policy directive governing colleges' programs of instruction (described above) does not address in detail the range and nomenclature of credentials that colleges may award, beyond the specification that colleges are to deliver programs of instruction that conform to the Ontario Qualifications Framework (discussed below) and are "consistent with accepted college system nomenclature/program titling principles."

Legislation establishing universities does not require or limit specific nomenclature of certificates, diplomas or degrees.

2. Credentials

Credentials awarded by colleges and universities fall into two categories relevant to this report: credentials recognised by the provincial government in its formal credential framework, and other credentials.

Ontario Qualifications Framework

The Ministry of Colleges and Universities has established the Ontario Qualifications Framework (OQF)—a matrix that sets out the minimum standards for non-religious postsecondary qualifications in Ontario that are offered by postsecondary institutions that are approved by the provincial government.

¹⁰ Information about this approval process can be found at <http://www.pegab.ca/> (accessed January 2020).

¹¹ Universities based in other jurisdictions may operate in Ontario if approval is granted by MCU under the *Post-secondary Education Choice and Excellence Act, 2000*.

¹² In some instances, the founding legislation limits the powers of the university to award only undergraduate credentials (Algoma University), or credentials in specified branches of learning (Ontario College of Art and Design University). Algoma University and OCAD U have been required to gain approval for degree programs through PEQAB; amendments to their statutes giving them broader degree-granting authority have been made but not yet proclaimed.

A credential framework was initiated in 2002 by the government's Postsecondary Education Quality Assessment Board (PEQAB) that, with substantial input from academic administrators in the postsecondary sector, led to the current Ontario Qualifications Framework. This policy document of the Ministry of Colleges and Universities continues to be revised, most recently in 2017 with the inclusion of the Indigenous Institutes as providers of some qualifications.

The government's explanation of the purpose of the framework includes the following statements:

A qualification framework, in detailing the learning outcomes for each credential, provides a solid basis for quality assurance. Also, the specifications of the OQF provide assurance that a credential offered in Ontario, such as a degree, meets the same high standards, regardless of whether it is offered by a university, college, Indigenous Institute or other postsecondary institution.

The OQF is a key piece of Ontario's strategy to maintain the quality, accessibility and accountability of its postsecondary education system. The knowledge and skills expectations may be seen as standards, and these may be taken into account when assessing, selecting or developing programs. The framework helps institutions to study how well their programs are meeting expectations, and it assists them in putting into place internal quality assurance systems.¹³

The OQF can be found on MCU's website [here](#).

The OQF includes certificates offered by colleges: Certificate 2 and Certificate 3. The purposes of both Certificate 2 and Certificate 3 is to prepare graduates for employment at entry-level positions or to prepare them to begin or continue postsecondary studies. Certificate 2 typically requires 240 to 500 hours of instruction, and Certificate 3 typically requires two semesters (or 600 to 700 hours) of instruction.

Micro-certifications typically are of shorter duration and are intended to document achievement of specific skills and competencies. Micro-certifications, as they are evolving in the postsecondary sector, are not now included in the OQF.

The main impact of the OQF is related to funding by MCU, and to quality assurance, as will be discussed in following sections of this report.

Continuing Education and credentials not included in the OQF

It is important to emphasise that the OQF is not an exhaustive list of credentials offered by colleges and universities.

Colleges and universities award certificates or diplomas on completion of a wide variety of other programs. This activity is often generically characterised as "continuing education" (CE). The range of CE programs is very wide, and it is thus difficult to make general observations that cover all CE programs. That said, colleges and universities offer many short programs or courses aimed at improving specific skills of professionals or practitioners, and also offer short programs or courses addressing a wide range of topics of interest to adults.

¹³ <http://www.tcu.gov.on.ca/pepg/programs/oqf/QsAsOQF.html> (Accessed December 2019).

Colleges

Colleges award certificates for two types of programs: ministry-approved certificate programs, and programs approved by the college's board of governors (called "board-approved" or "local board-approved" programs).

Colleges have wide latitude to name and deliver credentials for board-approved programs. This latitude could be used to name and deliver micro-certifications.

Colleges also have latitude to grant credentials for completion of parts of other programs. Some programs in colleges leading to a certificate can be laddered into credit toward a credential recognised by the OQF. This is further discussed in the operating grant section below.

Universities

Like colleges, universities have wide latitude to name and deliver credentials for CE programs that are not part of the OQF. This latitude could be used to name and deliver micro-certifications.

Much CE activity in universities is **not** recognised for credit towards a degree.

There are, however, some programs in universities leading to a certificate that can be laddered into credit toward a degree. These certificates are described in greater detail below in the section concerning operating grants.

Many universities offer a pathway for admission and credit recognition when students have completed courses without registration in a degree program, where the courses are part of degree-level programs.

Universities also offer graduate-level diplomas that are not (yet) included in the OQF. These are defined by and subject to the external quality assurance process in the university sector (discussed below).

3. Operating grants

MCU provides operating grants for enrolment in programs that lead to qualifications recognised by the Ontario Qualifications Framework.

It also provides funding for some other credentials in specific circumstances (described below).

For context, it is important to explain that operating grants for both colleges and universities are based on enrolment in programs that are approved for funding. Different programs have different funding weights (that is, receive different amounts of operating grant per student) reflecting an approximation of relative program costs.

Funding-eligible enrolments are counted on a fiscal full-time equivalent (FFTE) basis, where one FFTE represents the typical course load for a full-time student in that program.

Universities receive operating grants for enrolments at the course level for approved programs, as a portion of a full-time course load, at different funding weights for different programs.

Colleges also receive operating grants for full-time enrolments at the course level for approved programs, at different funding weights for different programs. In contrast to universities, colleges receive a lower level of operating grants for part-time enrolments (discussed below).

Colleges

The ministry provides operating grants for colleges for full-time enrolment in all the certificate, diploma and degree programs included in the OQF that have been approved for ministry funding. Funding is provided on a weighted basis, where different amounts of grants on a per-student basis are set by program.¹⁴

The ministry also provides funding for other enrolment in courses, where students are enrolled part-time in a program or simply taking a course (and not enrolled in the program). The ministry's binding policy directive on funding of part-time activity sets out the categories of courses whose enrolments are eligible for funding.¹⁵ In the main, courses approved for funding are mandatory or elective courses of full-time programs that have been approved for funding, occupational certification courses to meet occupational or licensing requirements of external bodies, "vocational courses", or PLAR portfolio development courses or assessment. Courses of general or personal interest, apprenticeship and some other categories of courses are explicitly excluded from eligibility for ministry funding. Funded courses must be at least 10 hours in duration, and students must meet college admission requirements.

A very significant proportion of CE activity in colleges is funded by the ministry on the basis of course enrolment where CE programs comprise courses that are also part of programs leading to credentials under the OQF.

CE and other part-time enrolments in eligible courses are funded at a lower rate per unit than for full-time enrolment in that program. All part-time enrolment in colleges is funded at a weighting factor of one.¹⁶

It would be possible for a college to deliver a micro-certification program, comprising parts of funding-eligible programs, that was thus eligible for operating grants.

It is important to note, however, that the funding claimed would be proportionate to the time required (or an equivalent) for completion of a micro-certification, as defined on a FFTE basis, and at a lower funding rate for part-time enrolment. Enrolment reported for funding would be included in the Weighted Funding Unit (WFU) count to calculate the college's position in its funded enrolment corridor.

If (as is sometimes the case) a micro-certification (or other form of certificate) was awarded for learning that was part of a student's existing college program, the enrolment could not be double counted.

Enrolments in micro-certification programs that are *not* comprised of courses of funding-eligible programs (or meet other definitions of funding-eligible courses) cannot be claimed for operating grants by colleges.

Universities

The ministry provides operating grants for universities for enrolment in programs leading to an undergraduate or graduate degree, on a weighted basis as in colleges.¹⁷

¹⁴ In Weighted Funding Units (WFUs)

¹⁵ Funding of Part-time Activity. Minister's Binding Policy Directive, April 2003, pages 3-5.

¹⁶ Unweighted grants for part-time students (compared to higher weights for full-time students), combined with lower tuition rates, creates financial challenges for colleges to increase part-time offerings.

¹⁷ In Weighted Grant Units (WGU's).

If (as is sometimes the case) a micro-certification (or other form of certificate) is awarded for learning that was part of a student's existing degree program, the enrolment cannot be double counted for funding.

Universities can also claim operating grants for enrolment in certificate or diploma programs if specified conditions are met. Enrolment in a course that is part of a certificate or diploma program may be counted towards a funded fiscal full-time equivalent (FFTE) if

- a) the course is eligible for credit toward a degree as approved by a senate or governing council;
- b) the minimum admission requirements for the certificate or diploma program are the same as those for degree students;¹⁸ and
- c) similar methods of academic assessment are employed for degree, diploma and certificate students.¹⁹

Enrolment in these funding-eligible programs is funded by the ministry at the same rate as full-time enrolment in that full-time university program, pro-rated by FFTE.

It could be possible for a university to claim operating grants for a micro-certification course, if the conditions set out above were met.

It is important to note, however, that the funding claimed would be proportionate to the time required for completion of a micro-certification, as defined on an FFTE basis. Enrolment reported for funding would be included in the Weighted Grant Unit (WGU) count to calculate the university's position in its funded enrolment corridor.

Outside of this possible exception in the university sector, enrolments in micro-certifications cannot be claimed for operating grants by universities.

4. Tuition

The normal costs of a program leading to a recognised credential (certificate, diploma, and degree) are to be met by tuition and operating grants. Tuition fees are regulated by MCU, and fees in addition to tuition are regulated by MCU's ancillary fee policies.

MCU releases an annual memorandum or directive setting out its tuition fee policy. The policy addresses the extent to which tuition fees can be increased and the requirements of the Tuition Set Aside (used to support needs-based financial assistance to students).

If the institution is introducing a new program, the tuition fee cannot exceed fees for comparable programs in other Ontario universities or colleges (as applicable). New programs require approval from the ministry to be eligible for funding, and the level of fees must be approved by the ministry.

Credit-bearing micro-certifications

If a micro-certification is credit-bearing, fees for the micro-certification would be a tuition fee regulated by the ministry's tuition framework.

¹⁸ Or, at Ryerson University, the course has been approved as part of an existing degree or diploma program and is transferable for full credit towards a degree or diploma program.

¹⁹ These conditions are specified in the Ontario Operating Funds Distribution Manual (2009-10) for university funding, Sections 4.4.5 and 4.4.6.

If a micro-certification is awarded for completion of a *part of* the ministry-funded program in which a student is registered, the student's tuition fee for the program would cover the micro-certification as well (the student could not be charged additional tuition).

If a micro-certification is *stand-alone*—not a component of a program—and eligible for operating grants:

- In universities, the student's tuition fee for funding-eligible certificates would be subject to the limit of the program that the certificate is built from; and
- In colleges, if the micro-certification is built from courses that are eligible for funding, the student's tuition fee would be based on the ministry's approved tuition rate for part-time enrolment.²⁰

Introduction of a micro-certification as part of an existing program would not allow the institution to increase the tuition fee (unless MCU changes its policy). The ministry's policy for many years has been to limit increases in any existing program to the allowable percentage increase to the tuition rate of the prior-year actual tuition.

Not-for-credit micro-certifications

The ministry's tuition fee policy applies only to programs whose enrolment is reported for operating grants. As a result, if a micro-certification is not-for-credit, the ministry's tuition policy does not apply and colleges and universities can charge any fee that they determine (conditioned, of course, by, market forces, their institutional policies, and governance requirements).

5. Ancillary fees

Fees levied on students in addition to tuition are also regulated by MCU's policies.

The policies in the college and university sectors are substantively the same, with specific differences arising from the types of programs funded by the ministry in the two sectors. For the university sector, MCU releases an annual memorandum setting out its tuition fee and ancillary fee policy. For the college sector, the ministry also updates its binding policy directive concerning tuition and ancillary fees.

The Ontario government's regulatory framework for fees makes a strong distinction between tuition fees and ancillary fees.

The ancillary fee policy of MCU applies to *compulsory* ancillary fees—fees that students must pay. A compulsory ancillary fee is defined as a fee imposed or administered by a given institution, or one of its constituent parts or its federated or affiliated institutions, in addition to regular tuition fees, which a student is required to pay in order to enroll in, or successfully complete, any credit course.

Institutions are not allowed to charge "compulsory tuition-related ancillary fees"—that is, fees beyond tuition for academic programs and services normally supported by tuition and operating grants—except as allowed under the policy.

²⁰ Tuition is set at the same rate per contact hour for all part-time students. Tuition and Ancillary Fees Minister's Binding Policy Directive, 2019-20 and 2020-21, page 24.

The policy sets out some categories of services for which compulsory fees may be charged—a specified list of essential services relevant to all students. If the required approval processes are followed, institutions can charge compulsory fees for the following essential services:

• Athletics and recreation • Career services • Student buildings • Health and counselling • Academic support • Student ID cards • Student achievement and records²¹ • Financial aid offices • Campus safety programs

The guidelines further define these services.

The policy also allows compulsory fees that have been established under an ancillary fee protocol that has been established with the involvement and consent of the institution's student government.

Some compulsory fees (in addition to essential services) are exempt from the requirement of approval under a protocol (for example, fees for field trips, learning materials retained by the student, and digital learning materials).

The application of the ancillary fee policy to micro-certifications is not specified in the ministry's policy documents. The following statements are an interpretation of the likely applicability.

For credit micro-certifications

As noted above, if an institution required completion of a micro-certification as part of a credit-bearing program, the costs of the micro-certification would likely need to be included in the students' tuition.

It is possible, however, that (some part of) a fee for a micro-certification could be considered a program-related ancillary fee. In both colleges and universities, "program-related fees are outside the scope of the framework and remain allowable compulsory ancillary fees for students registered in applicable programs."²² Normally, program-related fees relate to costs such as materials for studio or lab-based courses. MCU may consider a mandatory fee (above tuition) for a micro-certification to be a program-related fee.²³

Not-for-credit micro-certifications

It is most likely that an institution offering a not-for-credit micro-certification would offer it on voluntary basis. Where students could choose whether or not to pursue the micro-certification, the policy limiting ancillary fees would not apply. Where a micro-certification is voluntary, the institution could charge a fee. The only constraints on the level of fees would be (1) any relevant institutional policies, and (2) market forces.

²¹ Further defined as: "Fees related to the administrative costs of producing documents of student achievement such as diplomas and transcripts as well as the costs related to convocation may be charged as compulsory ancillary fees. No ancillary fees may be charged for the general administrative costs of maintaining student records for internal purposes."

²² Section 6.A.3 in the memorandum applying to universities, and page 13 of the binding directive to colleges.

²³ There is precedent that may be relevant. Colleges are currently permitted to charge a fee for testing and certification done by an external entity in industry (for example the Safe Serve certification concerning alcohol serving in the hospitality industry, or certifications for working at heights in construction). Fees cannot be for the provision of instruction that is included within the college program.

Fees for documentation of a micro-certification

The institution could charge a compulsory ancillary fee for the specific costs of producing the micro-certification document:

“Fees related to the administrative costs of producing documents of student achievement such as diplomas and transcripts as well as the costs related to convocation may be charged as compulsory ancillary fees. No ancillary fees may be charged for the general administrative costs of maintaining student records for internal purposes.”²⁴

Institution-specific requirements in ancillary fee protocols

The ministry’s ancillary fee policy established the requirement many years ago that each institution establish a protocol to govern some aspects of mandatory ancillary fees, negotiated with its student government and approved by both student government and the institution.

These protocols differ substantively in different institutions. It is possible that an institution’s protocol establishes its own requirements governing creation, amendment or administration of ancillary fees for micro-certifications.

6. OSAP

The provincial and federal governments provide financial assistance to postsecondary students, administered in an integrated way through the Ontario Student Assistance Plan (OSAP).

Students enrolled in micro-certifications that are not for credit are ineligible under OSAP because only programs that have been approved as eligible for funding by MCU are eligible for OSAP support.²⁵

If a credit-bearing micro-certification were eligible for funding (as part of a program that is eligible for MCU funding), the program must be at least 12 weeks in length to be eligible for OSAP support.²⁶

7. Program approvals and reviews by provincial quality assurance bodies

In both the university and college sectors in Ontario, institutions cannot initiate new programs without a quality assurance review. The approval process includes review of a new program by an arms-length entity.

All university programs and many college programs are also subject to a cyclical review process overseen also by an arms-length entity.

²⁴ Section 6.A.3 in the memorandum applying to universities, and page 14 of the binding directive to colleges.

²⁵ Ontario Student Assistance Program Full-Time Policy Manual, 2019-20, page 99.

²⁶ Ontario Student Assistance Program Full-Time Policy Manual, 2019-20, page 103. This requirement is also true for students enrolled in part-time studies. The program in which they are enrolled must be equivalent in content to a program approved for full-time OSAP (communication with an expert in the sector—MCU’s manual for part-time OSAP is not available to the public).

Quality assurance in colleges

The quality assurance process in colleges has two main aspects: one focused on programs, and another focused on institutions.

Colleges are subject to different review and approval processes for certificate and diploma programs on the one hand, and degree programs on the other hand.

Certificate and diploma programs

The colleges have established the Ontario College Quality Assurance Service (OCQAS). OCQAS oversees two distinct approaches to quality assurance. It operates an audit process—the College Quality Assurance Audit Process (CQAAP)—and it also operates a Credential Validation Service (CVS).

The CQAAP “involves the regular and cyclical review of each college’s quality assurance mechanisms. The standards provide the framework for Ontario’s colleges in assessing the extent to which their quality assurance mechanisms meet the established standards. Its purpose is developmental and its intent is to ensure continual improvement.”²⁷ The CQAAP focuses, amongst other things, on ensuring that programs leading to an Ontario college credential conform to the Ministry of Colleges and Universities’ (MCU) Credential Framework. The review process includes a program-level review of a sample of programs that lead to a credential recognised by the ministry.

The Credential Validation Service (CVS) reviews new programs, using MCU’s program standards based on program outcomes.²⁸ These program standards are reviewed and revised annually.²⁹ The CVS also reviews the draft standards for programs as they are developed and revised by MCU.

Approval by the CVS is required before the ministry will approve a new program for funding. The mandate of the CVS, given to it by MCU, is

Providing reasonable assurance that all programs of instruction, regardless of funding source, conform to the established Credentials Framework and are consistent with accepted college system nomenclature and/or program titling principles; and,

Maintaining the integrity of the credentials and protecting the interests of students and employers who require a reasonable guarantee of consistency and quality in Ontario’s programs of instruction.³⁰

The mandate of the CVS includes review of new programs leading to all the credentials included in the Ontario Qualifications Framework (OQF) delivered by colleges. In practice, the CVS reviews programs leading to certificate 3, diplomas, advanced diplomas and post-diploma certificates, because these are funded by MCU and MCU requires CVS review for approval of new programs for funding.

Certificate 2 programs (sometimes called “board-approved” or “locally-approved board” certificates) are included in CVS’s mandate, but colleges have discretion about whether to submit these to CVS.

²⁷ <https://www.ocqas.org/quality-assurance/about-cqaap/> accessed January 2020.

²⁸ Program standards are explained at <http://www.tcu.gov.on.ca/pepg/audiences/colleges/progstan/> accessed January 2020.

²⁹ Current standards are posted on the MCU website at <http://www.tcu.gov.on.ca/pepg/audiences/colleges/progstan> accessed January 2020.

³⁰ <https://www.ocqas.org/credentials-validation-service/about-cvs/> accessed January 2020.

Most often, colleges choose not to submit these programs to CVS review. In 2018-19, no locally approved board certificates were submitted for review.³¹

CVS has no role in review of programs once these have been approved. Cyclical reviews are the responsibility of colleges (and a sample of programs is reviewed under the CQAAP audit described above).

Hence, where a micro-certification is offered as a stand-alone short “program” or developed as a locally approved board certificate (certificate 2 under the OQF, or some other credential), it would not be subject to the Ontario colleges’ external quality assurance requirements.

If a micro-credential is part of a credit-bearing program that has been otherwise approved, it would not necessarily be subject to external quality assurance. Two exceptions could occur. If the program of which it is a part were audited under the CQAAP process, the micro-certification could be reviewed as part of the audit. If introduction of the micro-certification (by itself, or in combination with other changes) created sufficient change in the program, the program would need to be submitted to CVS for re-approval. The threshold for required re-submission is 25 percent of curriculum, vocational learning outcomes, or length of program.

Colleges have *internal* policies concerning quality assurance that may apply to micro-certifications.

Degree programs

Colleges must receive approval to offer degree programs from the Minister of Colleges and Universities, through a process established in the *Post-secondary Education Choice and Excellence Act, 2000* that requires review by Postsecondary Education Quality Assessment Board (PEQAB). Approvals of degree programs are time-limited, and colleges must apply again for approval to continue a degree program.³²

Not-for-credit micro-certifications are not degree-level programs and would not be subject to PEQAB approval.

Where a micro-certification was part of a college degree program, in theory it could be reviewed as part of the assessment of curriculum and program and learning outcomes. PEQAB’s review process (for proposals of both new and renewed programs) includes a detailed consideration of program structure (including core courses) and outcomes. It is possible that a micro-certification could be considered if it were part of the degree program structure. Credit-bearing micro-certifications themselves would not be subject to PEQAB review under current legislation or policy.

Quality assurance in universities

Ontario universities are self-regulated concerning quality assurance. They have established an independent body called the Ontario Universities Council on Quality Assurance (commonly referred to as the Quality Council). The Quality Council has established standards for each university’s own institutional quality assurance processes, approves new programs, sets standards for and oversees

³¹ Credential Validation Service Report 2018/19, page 2. <https://www.ocqas.org/blog/2019/11/credential-validation-service-report-20182019/> (accessed January 2020).

³² Information about PEQAB can be found at <http://www.peqab.ca/> (accessed January 2020).

cyclical reviews of all existing Ontario university programs,³³ and periodically audits institutions' compliance with quality assurance standards and processes.

The standards are set out in Quality Assurance Framework (QAF), found [here](#).

The QAF applies only to degree programs, and to three categories of graduate diplomas.³⁴

As a result, a micro-certification that is offered as a not-for-credit program would not be subject to the Ontario universities' quality assurance requirements set by the Quality Council. It would not require the Quality Council's approval to be offered, and it would not be subject to the requirements of the Quality Council for universities' own quality assurance processes (though universities could choose to include quality assurance requirements for micro-certifications in their own processes).

Universities' own quality assurance processes, and new program approvals and institutional audits all consider a program's articulation and assessment of learning outcomes, and the program elements and resources that are intended to support learning outcomes. As a result, where a micro-certification is provided as part of a credit-bearing program, in theory it could be considered or reviewed as part of the Quality Council's review, either in a new program approval or in a cyclical review, as part of the teaching and learning and assessment of learning outcomes. In practice, however, it is unlikely that a micro-certification that is part of a credit-bearing program would receive a focused or extensive review by the Quality Council in either a new program or in a cyclical review.

8. Program funding approvals by the Ministry of Colleges and Universities

In both the university and college sectors in Ontario, institutions cannot claim operating funding for programs unless the programs have been approved for funding by the Ministry of Colleges and Universities.³⁵ All new programs for which an institution seeks funding must be submitted to the ministry.³⁶

Because micro-certifications are not programs recognised for funding, the ministry's program approval process will not apply.

If a micro-certification were part of a new credit-bearing program, it is unlikely that the ministry's program approval process would review the micro-certification in any detail. (See further discussion above concerning quality assurance in section 7.)

³³ Each university reviews each of its programs at least every eight years, on a staggered schedule. Results of program reviews are provided to the Quality Council and a sample of cyclical program reviews are reviewed in the Quality Council's audit of a university.

³⁴ QAF, section 1.4, and definition of "diploma" in section 1.6 (definitions).

³⁵ MCU's program approval policies for universities are found in the Ontario Operating Funds Distribution Manual (2009-10), section 3.1 and in various memoranda. For colleges, information about MCU program approvals can be found at <https://www.ocqas.org/credentials-validation-service/about-cvs/> accessed January 2020.

³⁶ There is an exception in the university sector. "Core" programs in arts and science disciplines can be initiated and enrolments claimed for funding without prior approval by the ministry. Core programs are defined as "Biological Sciences (including Biotechnology), English Language and Literature, French Language and Literature, General Arts and Science, Humanities (including ancient and classical languages), Mathematical Sciences and Computer Studies, Physical Sciences, Social Sciences (including Women's Studies), and Theology". In the main, universities are already offering core programs, and newly proposed programs virtually always fall outside the definition of core programs and require approval.

At the time of writing this report, MCU has announced changes to streamline the program review process for most new programs (excluding programs leading to professions where the government is a major funder). Details have not yet been released. Based on the communication to date from the ministry, it is not likely that changes will expand the scope of program approvals described above.

9. Funding linked to experiential learning

A final aspect of the policy and regulatory framework in Ontario could be relevant to micro-certifications: the policy of the Ontario government concerning experiential learning and its use in funding.

The ministry's policy has importance beyond its intent to encourage institutions to ensure that students have opportunities for experiential learning. Experiential learning is one of the ten (10) metrics that will be used in the implementation of the province's performance-based funding for colleges and universities.

With respect to the experiential learning metric, beginning in 2020-21 a part of each university's and college's operating grants will be linked to achievement of targets for the number and proportion of graduates who participated in at least one course with required experiential learning component(s).

The ministry has confirmed a definition. Experiential learning, to be counted in the funding metric, must be a component of a for-credit course in a diploma or undergraduate program, tracked at the level of individual students, verified or evaluated and count towards course credit or credential completion.³⁷ MCU may develop more detailed direction before implementation of this metric.

Micro-certifications may be tangentially related to this issue because micro-certifications could be used (among other possible means) as a way for colleges and universities to evaluate and verify a student's completion of experiential learning that meets the definition that the ministry will use in funding.

Summary: Applicability of the Ontario framework to micro-certifications

The tables set out below summarise the applicability of the policy and regulatory framework in Ontario for colleges and universities to the awarding of micro-certifications.

It is important to iterate that this analysis addresses only the *external* policy and regulatory framework created by the provincial government and the Ontario postsecondary sector's quality assurance mechanisms.³⁸

Each college and university has its own academic and operational policies that may be relevant to the issues addressed in the table.

As will be evident from the summary table, the major distinction that is relevant to the external policy and regulatory framework **is whether a micro-certification is credit-bearing or not-for-credit.**

Where a micro-certification is not-for-credit, the current external policy and regulatory framework does not apply.

³⁷ MCU. Performance/Outcomes Based Funding – Technical Manual, September 2019, page 36.

³⁸ The analysis also excludes requirements that might arise from external professional or industry accreditation processes.

Where a micro-certification credit-bearing—where it contributes toward completion of the requirements of a credential recognised by the provincial government's Ontario Qualification Framework, and/or is eligible for operating grants, or is designed to be recognised for credit transfer—the current framework has significant implications.

Summary table: Overview

Issue	Not-for-credit micro-certifications		Credit-bearing micro-certifications	
	Colleges	Universities	Colleges	Universities
Authority to award credentials, including micro-certifications	Allowed under Minister's binding policy directive.	Allowed by university-specific statute.	Allowed under Minister's binding policy directive.	Allowed by university-specific statute.
Nomenclature of credentials	<p>Both colleges and universities are bound to use credential nomenclature guided by the provincial government's Ontario Qualification Framework (OQF).</p> <p>Micro-certifications, however, are not described in the OQF, so the OQF imposes no limits on nomenclature of micro-certifications.</p> <p>(Many colleges and universities have internal policies on nomenclature.)</p>			
	No other restrictions beyond practice "consistent with accepted college system nomenclature/program titling principles".	No statutory or other provincial policy limitations.	No other restrictions beyond practice "consistent with accepted college system nomenclature/program titling principles".	No statutory or other provincial policy limitations.

Issue	Not-for-credit micro-certifications		Credit-bearing micro-certifications	
	Colleges	Universities	Colleges	Universities
Operating grants	Ineligible for operating grants	Ineligible for operating grants	Could be eligible for operating grants (weighted by FFTE), if the micro-certification is built from courses in programs eligible for funding.	Could be eligible for operating grants (weighted by FFTE), if the micro-certification counts toward completion of an approved degree program, and has the same admission and assessment standards as the degree program.
Tuition	No regulation of tuition	No regulation of tuition	Subject to the provincial tuition framework See summary table on tuition framework, below	Subject to the provincial tuition framework See summary table on tuition framework, below

Issue	Not-for-credit micro-certifications		Credit-bearing micro-certifications	
	Colleges	Universities	Colleges	Universities
Ancillary fees	<p>For both colleges and universities:</p> <p>No direct regulation of ancillary fees, but fees could be subject to the college's ancillary fee protocol with student government.</p>		<p>For both colleges and universities:</p> <p>Ancillary fees might be considered "tuition-related" and disallowed.</p> <p>Narrowly defined fees for the cost of producing documentation are allowed.</p> <p>It is possible that some ancillary fees could be allowed as "program-specific" fees.</p>	
Program approvals by MCU	Not applicable	Not applicable	See summary table on MCU program approvals, below	See summary table on MCU program approvals, below
Program approvals and reviews by provincial quality assurance processes	Not applicable	Not applicable	<p>For both colleges and universities:</p> <p>Not directly applicable.</p> <p>Micro-certifications that are part of a program leading to an OQF credential might be minimally considered in reviews addressing curriculum and learning outcomes.</p>	

Issue	Not-for-credit micro-certifications		Credit-bearing micro-certifications	
	Colleges	Universities	Colleges	Universities
Experiential learning (counted in performance-based funding metric)	Not applicable	Not applicable	If criteria are met, could be used as a way to evaluate and verify a student's completion of experiential learning that meets the definition that the ministry will use in funding.	

Summary table: Credit-bearing micro-certifications: Tuition framework and MCU program approvals

This table expands on two issues applicable to **credit-bearing micro-certifications**: the MCU tuition framework, and MCU program approvals.

It is organised by “type” of micro-certification. The taxonomy of “type” is based on characteristics of possible micro-certifications that are relevant to the regulatory framework. The “types” are illustrative only and may not address all possibilities.

The ministry’s policy concerning program approvals does not address micro-certifications. It is important to emphasise that the statements in the table about program approvals are in essence arguments in support of a reasonable policy position.

Type of micro-certification	Institution	Tuition framework	MCU program approvals
<p>Component of existing program:</p> <p>Awarded to students registered in a credential program when existing specified courses or other program components are completed.</p>	Colleges and universities	<p>No additional tuition can be charged beyond the fee for the existing program.</p> <p>Fees for the micro-certification are the fees for the courses that comprise it, as part of the student’s main credential program (or, in the case of college continuing education courses, the approved tuition fees for funded courses).</p>	Not applicable, since the main credential (of which the micro-certification is a component) has been approved.

Table continued over page

Type of micro-certification	Institution	Tuition framework	MCU program approvals
<p>Laddering with existing courses:</p> <p>Awarded to students not registered in a credential program, based on academic work that is part of an existing credential program.</p> <p>Could be recognised for credit transfer.</p>	Colleges	Tuition framework applies if the courses are counted for operating funding (see discussion above on pages 9-10).	<p>Not applicable:</p> <p>If the micro-certification is a board-approved program, MCU approval is not required.</p> <p>If the micro-certification is built from funding-eligible courses, MCU has already approved the program.</p>
	Universities	Tuition framework applies if the courses are counted for operating funding (see discussion above on pages 10-11).	Not applicable, since components of the micro-certification have been approved as part of an existing degree program.
<p>Laddering with equivalent work:</p> <p>Academic work equivalent to but different from that in an existing credential program, and that can be recognised for credit transfer/PLAR.</p>	Colleges and universities	<p>It is assumed that enrolments in these micro-certifications are not reported for operating grants.</p> <p>The tuition framework is not applicable, because the framework applies only to programs funded by MCU.</p>	Not applicable, since the micro-certification itself does not lead to a credential recognised by the Ontario Qualifications Framework, and activity is not funded by MCU operating grants.

Table continued over page

Type of micro-certification	Institution	Tuition framework	MCU program approvals
<p>Additional credit-bearing activity:</p> <p>Optional academic work (outside of a program's courses) that can be counted toward credential completion, akin to an elective.</p>	Colleges	Tuition framework applies. Fees must be incorporated into the overall fee for the student's main credential program.	<p>Not applicable, since this is in effect a change in curriculum in an existing approved program—</p> <p>Unless the micro-certification changes the existing program above the 25% threshold, requiring re-submission to CVS and MCU.</p>
	Universities	Tuition framework applies. Fees must be incorporated into the overall fee for the student's main credential program.	Not applicable, since this is in effect a change in curriculum in an existing approved program.

Appendix: Method

The report has benefitted from the knowledge and advice of many individuals in the Ontario college and university sectors. Any omissions or errors are the responsibility of the author.

This report is based on:

- Review of documents produced by the Ministry of Colleges and Universities, the Ontario College Quality Assurance Service, the Ontario Universities Council on Quality Assurance and the Post-secondary Education Quality Assessment Board.
- Interviews with administrators at colleges and universities who are engaged in development and delivery of micro-certifications, including Humber College, Algonquin College, McMaster University, Ryerson University and Queen's University.
- Interviews with experts in the college and university sectors that are knowledgeable about funding, tuition, registrarial policies and processes, program approvals, and quality assurance.

The report has **not** been approved by officials of the Ontario Ministry of Colleges and Universities, and the report has **not** been approved by the various provincial quality assurance entities in Ontario.

Readers are invited to send comments about omissions, clarifications or corrections of the report to info@petergooch.ca