

National Association of Career Colleges
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Immigration, Refugees and Citizenship Canada
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Consultation on Alternative Approaches to the Express Entry System

To Whom It May Concern,

Canada's labour shortages remain one of the most significant economic and social challenges facing the country. Immigration and workforce development policy must continue evolving to support regional economic growth, essential services, and long-term population sustainability.

A modernized Express Entry framework should preserve the flexibility required for provinces, employers, and regulated education providers to respond effectively to evolving workforce realities and should reflect the workforce needs of our nation. Economic earning potential is not the best suited metric for ensuring successful economic outcomes.

NACC appreciates IRCC's willingness to engage stakeholders on the future of the Express Entry program and supports efforts to create a more responsive, accountable, and workforce development aligned system. We would welcome continued dialogue with IRCC officials and would be pleased to participate in any future consultations or bilateral discussions.

Thank you again for the opportunity to contribute to this consultation.

Sincerely,

Michael Sangster
Chief Executive Officer
National Association of Career Colleges



Introduction

We support IRCC's objectives to improve operational efficiency, reduce duplication, simplify pathways, and strengthen alignment between immigration selection and long-term economic outcomes.

Canada's strength lies in the diversity of its post-secondary system. Career colleges, colleges, polytechnics, and universities collectively prepare learners across a broad range of occupations and levels of study. From certificates and diplomas to undergraduate and graduate education, each pathway contributes essential skills to Canada's labour market and economy

While we support modernization efforts, several proposed changes risk unintentionally constraining Canada's talent pipeline, reducing recognition of Canadian educational pathways, and weakening workforce supply in sectors already facing persistent shortages.

Q1: What are your thoughts on the overall direction to simplify Canada's Federal High Skilled immigration programs and streamline eligibility requirements?

We generally support IRCC's direction to simplify and streamline the Federal High Skilled immigration programs. Reducing duplication and creating a more transparent system may improve accessibility for applicants and operational efficiency for government.

However, simplification should not come at the expense of labour market responsiveness.

Canada's workforce needs are diverse and evolving. A streamlined system must continue to recognize multiple forms of human capital and economic contribution, including applied education, skilled trades, work-integrated learning, research training, and sector-specific experience.

We are particularly concerned about proposals that could unintentionally narrow pathways for international graduates who complete certificates, diplomas, or applied learning programs in Canada's regulated career colleges. Many critical sectors—including health care, skilled trades, transportation, technology, agriculture, community care, and cyber and IT occupations depend heavily on graduates from these pathways.

Awarding Canadian study points only to graduate-level credentials risks overlooking the broad range of skills and contributions that graduates from applied and undergraduate programs bring to the labour market. Restricting recognition to graduate credentials may unintentionally diminish the value of Canada's broader post-secondary ecosystem and reduce Canada's ability to attract and retain the diverse talent needed across the economy.

The proposed reforms should therefore enhance recognition of Canadian post-secondary credentials across all levels of study and preserve multiple pathways for skilled workers to transition successfully to permanent residence.



Q2: How effective do you think this approach would be in achieving the stated objectives around client experience and operational efficiencies?

A more streamlined system could improve client experience by making eligibility requirements easier to understand and reducing confusion between programs. Greater consistency may also improve administrative efficiency and reduce processing complexity.

However, operational efficiency should not be achieved through excessive simplification that reduces adaptability or excludes qualified candidates who contribute significantly to Canada's economy and communities.

Frequent or rapidly implemented policy changes over the past several years have already created substantial uncertainty for students, employers, institutions, and workers navigating long-term education to permanent residence pathways. Predictability and transparency are essential to maintaining confidence in Canada's immigration system.

Any reforms should therefore include:

- Clear transition measures;
- Advance notice before implementation;
- Transparent communication timelines;
- Protections for applicants already in process; and
- Ongoing consultation with educational institutions, employers, provinces, territories, and sector stakeholders.

Without these measures, otherwise positive reforms risk undermining Canada's reputation as a reliable destination for international students and skilled immigrants.

Q3: What opportunities and challenges do you anticipate related to the possibility of merging the programs and streamlining requirements?

A merged program could:

- Reduce administrative duplication;
- Improve transparency;
- Increase consistency in candidate assessment; and
- Better align immigration selection with evolving labour market priorities.

However, significant challenges may arise if the new framework does not adequately account for sectoral and regional labour needs.

Canada faces severe workforce shortages in many occupations that may not meet proposed "high-wage occupation" thresholds but remain essential to the functioning of the economy and public services. Home and community care is one example. Personal Support Workers (PSWs) and Health Care Aides (HCAs) are experiencing acute shortages nationally, with Ontario alone projected to require approximately 50,853 additional PSW's by 2032.



Restricting immigration pathways primarily to high income occupations risks worsening shortages in sectors already struggling with recruitment and retention.

We are also concerned that excluding work experience gained while studying full-time may unintentionally disadvantage international students participating in:

- Co-operative education programs;
- Clinical placements; and
- Early career employment opportunities.

These experiences help students develop practical skills, understand Canadian workplace norms, build professional networks, and contribute directly to local labour markets while completing their education.

Excluding work experience gained while studying full-time risks undermining IRCC's objective of attracting and retaining individuals positioned for long-term success in Canada.

A balanced approach should therefore recognize:

- Canadian educational attainment at all levels;
- Applied and work-integrated learning;
- Regional workforce realities; and
- Essential occupations experiencing persistent shortages.

Q4: What are your thoughts on the overall direction to refocus the Comprehensive Ranking System on factors associated with positive economic outcomes?

We support a Comprehensive Ranking System that remains evidence-based and focused on long-term economic success, including language ability, education, and Canadian work experience.

However, positive economic outcomes should not be defined only by short-term wages or high-income occupations.

The system should also continue recognizing Canadian study across credential levels, including applied and undergraduate pathways that support essential sectors.

Q5: How effective do you think the potential changes to the Comprehensive Ranking System would be in achieving the stated objectives around economic outcomes and selection of top talent?

The proposed changes may improve selection if they remain broad and balanced, but relying too heavily on wage thresholds could exclude candidates in essential sectors that do not always meet high-income benchmarks.

Selection criteria should reflect both economic outcomes and workforce needs in areas such as care, trades, education, transportation, agriculture, and technology.



Q6: What opportunities and challenges do you anticipate related to the possibility of refocusing the Comprehensive Ranking System on the best predictors of economic outcomes?

Refocusing the Comprehensive Ranking System creates an opportunity to simplify selection, strengthen integrity, and better recognize candidates with strong potential for long-term success in Canada.

- Improve evidence-based selection;
- Reduce unnecessary complexity; and
- Recognize Canadian integration and professional readiness.

However, the risks of an overly narrow approach should be carefully considered.

An overly narrow focus on immediate earnings could worsen shortages in essential sectors, reduce Canada's competitiveness for international students, and create uncertainty for applicants, employers, and institutions. Clear transition measures and predictable implementation will be essential.

Q7: Is there anything that we have not covered, that you would recommend?

IRCC should ensure the system remains flexible, predictable, and inclusive of the full range of Canadian education and labour market needs.