

**BRIEF TO THE COMMISSION ON POST-SECONDARY EDUCATION**

**SUBMITTED BY**

**NEW BRUNSWICK ASSOCIATION OF CAREER COLLEGES**

**APRIL 2007**

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**New Brunswick Association of Career Colleges  
Brief to the  
Commission on Post-Secondary Education  
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**Background**

The New Brunswick Association of Career Colleges welcomes this opportunity to share its views with the Commission on Post-Secondary Education. We have provided the Commission with background information on our Association and on the private career college sector in New Brunswick and we have had discussions and meetings with members and staff of the Commission. In this brief, we will offer some suggestions that we hope will guide the Commission's deliberations and we will respond to some of the issues raised in the Commission's Discussion Paper which was released in early March.

It has been noted that there is a marked lack of data on the private career college sector and on its students. In an attempt to fill this gap, the NBACC has contracted with a survey firm to collect data from member colleges and students. This survey will provide us with current information on a number of issues, including the programs offered by our colleges, on the number of instructional and non-instructional staff, and the number of students in our colleges. It will also provide us with data on our students, including their educational and work background, how they are financing their education and why they selected a private career college. The results of this survey will be provided to the Commission before April 30.

In November 2006, the NBACC submitted to Government a response to the Draft Student Financial Assistance Designation Policy. We have also provided a copy of our response to your Commission. That paper sets out in some detail the concerns of our sector with respect to this crucial part of the fabric of post-secondary education. Without access to Student Financial Assistance, too many of our students would not be able to pursue higher education. Any educational institution that loses its designation under the new Policy, be it private or public, would in all likelihood close its doors. At this time, we do not know the status of the new Policy, nor when it will be implemented. As our response to the Draft Policy pointed out, and as we will present further in this brief, there are many elements of post-secondary education policy which, in effect, erect systemic barriers to the private sector and which seem to be developed through a lens that is public sector centred. We urge this Commission not to fall prey to this tendency, but to look at the entire post-secondary system and all its components – public and private, university and college – as equal partners, each with its own unique contribution to the system.

The New Brunswick Association of Career Colleges represents private post-secondary colleges in the province and is affiliated with the National Association of Career Colleges. Our member colleges are registered under the *Private Occupational Training Act*, administered by the Department of Post-Secondary Education, Training and Labour. Some of our members also serve on the Board of the Private Occupational Training Corporation, which manages the Training Completions Fund.

The past year has been an important one for our Association and for the private career college sector in New Brunswick. Last year, our Association received a grant from the Dept. of Post-Secondary Education, Training and Labour to develop and implement a Quality Assurance Program and an Instructor Development Program. The Quality Assurance Program of the NBACC is based on a framework developed by the former Dept. of Training and Employment Development, which was modeled after similar programs in place in the Maritime Provinces Higher Education Commission and in the New Brunswick Community College network. Currently our Quality Assurance Program is being piloted in two of our member colleges. In June, the program will be available to all our members.

By our involvement in Quality Assurance, we are demonstrating our commitment to delivering education and training that is of the highest standard, in a professional and caring learning environment which supports our students' desire to build marketable skills. It also demonstrates our commitment to operate our colleges based on ethical business practices. We share these goals with our sister colleagues in the public post-secondary education sector.

The NBACC Instructor Development Program is another example of our commitment to quality education for our students. Through this program, our instructors develop skills that will ensure the learning experience of our students is of high quality, geared to their learning needs and reflective of state of the art methods of teaching at the post-secondary level.

### **The Mandate of the Commission**

The Commission on Post-Secondary Education was established by Government and as such, we might expect that a large proportion of its recommendations will deal with what Government can most directly influence. In the case of education and training, Government can most directly influence and impact publicly supported universities and community colleges. It is a responsibility of Government to ensure that the systems and services which are supported by taxpayer dollars respond efficiently and effectively to the greater needs of society and that they function well to achieve the overall goals of Government, for the social, economic and cultural growth of our Province and the well being of our citizens.

In addition to operating grants provided by Government to public institutions, it is necessary that Government devote a portion of its bureaucracy to administer and support the grants and to represent the public interest in post-secondary education. Government has significant investments in public sector universities and community colleges, so it is not unreasonable to expect that when Government considers post-secondary education, it will think for the most part in terms of public sector institutions. The policies, programs and regulations it develops may be created with a view of the realities faced by public sector institutions, not adequately considering the day to day realities faced by private institutions. Thus, in some cases, programs come into effect which by definition exclude private sector institutions and their students. For example, scholarship programs which are available only to students in programs of at least two years duration exclude most students in private colleges. Another example is in the proposed Student Financial Assistance Designation Policy, where special consideration may be given to an institution whose repayment rate is not in the green zone, but which

plays a role in helping to fulfill Government policy priorities. It is, by definition, difficult for a private institution to meet this requirement.

When Government considers private institutions, be they career colleges or universities, it often thinks in terms of the need for regulation and monitoring, for the protection of the public interest, which includes consumer protection. It follows, therefore, that Government may not always think of private institutions in terms of being equal partners in the post-secondary education field.

The NBACC has made considerable progress in working with Government to overcome this way of thinking. The support, both financial and moral, that we have been given by Government to develop and implement the Quality Assurance and Instructor Development Programs is evidence of an evolving recognition of the important role of private career colleges in post-secondary education. We ask that as your Commission studies this issue and makes recommendations on the future of post-secondary education in New Brunswick, that you take steps to build upon this progress. We ask that you consider private career colleges not just as private businesses to be regulated, but also as institutions of higher learning, where fellow educators and trainers play an important role in developing New Brunswick's future work force. We ask that the particular strengths of the private career college sector and the realities the sector deals with, be considered.

### **The Ideal Post-Secondary System**

The Commission's discussion paper asks us to consider what the ideal post-secondary system for New Brunswick would look like and what would be expected from such a system. Our view is that the ideal system will offer students a variety of learning options, all of which are targeted to increasing the knowledge and skill level of our citizens, to enable New Brunswick and New Brunswickers to achieve their goals for self-sufficiency as a province and as individuals.

We do not think the ideal post-secondary system requires huge additional amounts of government funding, putting further demands on the taxpayer. The ideal system requires that we identify the unique strengths of each of its component parts and match those strengths to the needs of New Brunswickers for higher education. The ideal system will be a partnership, a collaboration, where both public and private sector institutions have roles to play and where each sector recognizes the valuable contribution of the others. What the public sector can do best, the public sector should do and what the private sector can do best, the private sector should do. There is no need for Government to allocate additional resources to serve a need that is already being served by the private sector, or to serve a need that may be more efficiently served by the private sector. By identifying the unique strengths of both the private and public sectors, of universities and of colleges, the ideal post-secondary system will make efficient and effective use of the resources available to it.

And what are some unique strengths of the private career college component of the system? Private career colleges provide training that is skill-directed, with clear measurable outcomes for students. The length of our training programs is often shorter than in public sector institutions. These condensed programs often better meet the needs of many learners. Class size is generally smaller than in public institutions, which

better facilitates the skill-centred, concentrated nature of the curriculum. Private colleges have less costly infrastructure, in terms of buildings and property, than do many large public sector institutions. Private colleges benefit from having more streamlined processes and procedures than what is required in larger public sector institutions. This helps us to provide state of the art technology and equipment so that students can acquire skills first hand on the latest equipment used in the work place. Many of our private colleges have considerable investment in this type of technology and equipment. Private colleges can adapt and renew curriculum efficiently and effectively, to respond to new technology and new demands of industry. They provide easier access for students, with frequent intakes and with many program schedules designed to allow students to combine work and study, to better meet their financial needs while in school.

We think the ideal post-secondary system will address the needs not only of youth at the point in their lives between high school and the work force, but also of people who are in the work force. This will become increasingly important as our population ages. The needs of these two groups of people are not all the same. People in the work force need education and training to enable them to acquire specific skills they need to keep up with changing technology in the workplace. Some need training which will take them into entirely new kinds of jobs. People who have family and community responsibilities need training options which are short term, concentrated, offered when and where they need it. They need programs offered during evenings and weekends, programs which combine distance learning with hands on practice, and programs which commence not only in September or January, but also throughout the year. They need programs offered in their community, be it in the larger cities of New Brunswick or in a rural area.

Institutions in the ideal system will have high standards of quality which are made known to citizens and on which institutions will regularly report. The NBACC Quality Assurance Program and its Instructor Development Program demonstrate our belief in the importance of quality, of saying not only that we deliver quality, but of demonstrating that fact openly and transparently. Our public sector colleagues in both the community college and university sectors have considerable experience in Quality Assurance and we are pleased to be able to benefit from that experience, as we collaborate with them in the development and delivery of our Program. The Monitoring Committee of our Quality Assurance Program includes membership from Government, including the NBCC and the Apprenticeship Program.

The ideal post-secondary system will foster partnerships between institutions in both the public and private sectors, among both universities and colleges. Partnerships will allow institutions to build on their own strengths while encouraging and supporting each other. These arrangements will prevent duplication and overlap, which results when any of us tries to be all things to all people. The discussion paper talks about “collaboration with differentiation” and we echo that goal.

Public-private-university-college partnerships will be on many fronts. They will include credit transfer and credit recognition and the option to challenge exams in each other's systems. These partnerships will be seen in joint research projects, where faculty from one institution provides their breadth of knowledge and experience, another institution provides technical expertise and another provides state of the art equipment.

We offer a caution with respect to partnering: when partnering is not carried out on a level playing field, when the entry requirements to join a partnership by definition exclude

a group of potential partners, then any partnership that results could be construed as an attempt at monopoly. Systemic barriers to partnering must be eliminated as much as possible. The prospect of more institutionalized collaboration between publicly supported universities and community colleges, to the exclusion of the private career college sector, is unsettling. For example, the suggestion of an opportunity to create a new kind of public sector institution out of the establishment of a community college in Fredericton, where there are already two publicly supported universities, as well as a number of private colleges, is something we would hope would be carefully examined. While we applaud the notion of looking to a new kind of institution to meet the needs of the twenty-first century, we would hope that the role of the private career college sector would be carefully considered. The unique strengths of our system, and the kinds of offerings we provide should be factored into any deliberation of this kind. We would welcome the opportunity to discuss this notion with our public sector colleagues. We are confident that our colleges can learn from the public sector and that the public sector can learn from us, as we together consider the needs of our citizens.

### **Success of Students**

We note the question posed in the discussion paper as to whether or not too many people enter university who would be better served by another form of post-secondary education. We too are concerned that the advice or guidance provided to many high school students and others seeking training and education does not best meet their needs. Private career colleges offer options which may better suit the needs of many people who want to become employable, with up to date skills that are needed in the workplace, and who want to do so expeditiously and efficiently. We must make sure that these options are made available to people making these kinds of personal decisions. We must make sure that the support systems, including access to Student Financial Assistance, bursaries and scholarships, are in place to help people pursue the education of their choice, whether it is in a public sector institution or a private one.

Another important factor in the success of students in post-secondary education is their level of preparedness for higher education. Our private colleges are seeing increasingly that too many students enter our class rooms with inadequate levels of literacy and numeracy to handle the curriculum we provide. We understand our public sector colleagues are seeing the same disturbing phenomenon. While the mandate of this Commission is with regards to post-secondary education, we hope it will also address this reality that has such an important impact on the post -secondary sector, and on both public and private investment in the sector.

### **Conclusion**

We have outlined here some issues which we hope the Commission will consider in its deliberations and we look forward to further discussions with Commission members and staff. As we stated above, before April 30, we will provide to the Commission the results of our survey of member institutions and their students, which will serve to contribute to the body of knowledge available on the post-secondary sector in New Brunswick.

The most important point we wish to make to the Commission is the need for all players in the post-secondary education system to be considered in light of their strengths and

contribution to the knowledge and skill development of New Brunswickers. Private career colleges want to be considered as equal partners with their colleagues in higher education. We want to work with these partners in a system dedicated to the development of New Brunswick citizens who are equipped to compete successfully in the global economy of the twenty-first century.