



POLICY PAPER

Ancillary & Incidental Fees

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ABOUT OUSA

OUSA represents the interests of 150,000 professional and undergraduate, full-time and part-time university students at eight student associations across Ontario. Our vision is for an accessible, affordable, accountable, and high quality post-secondary education in Ontario. To achieve this vision, we've come together to develop solutions to challenges facing higher education, build broad consensus for our policy options, and lobby government to implement them.

The member institutions and home office of the Ontario Undergraduate Student Alliance operate on the ancestral and traditional territories of the Attawandaron (Neutral), Haudenosaunee, Huron-Wendat, Leni-Lunaape, Anishnawbek, and Mississauga peoples.

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EXECUTIVE SUMMARY

Ancillary fees fund services and supports that promote a safe, fulfilling, well-rounded post-secondary experience. The Student Choice Initiative (SCI), introduced in January 2019, allowed students to opt out of services that the provincial government deemed “non-essential.” The resulting funding cuts have reduced the effectiveness and threatened the existence of many services, including student associations, sexual health centres, peer support centres, student-run food banks, and campus media.

Other issues with ancillary and incidental fees remain as well. Housing and administrative costs, among other incidental fees, remain largely unregulated. Textbook and learning material costs remain high and unregulated as well. Students continue to fund more than their fair share of capital projects through ancillary fees. And, in general, there is lack of transparency, accountability, and consistency in how ancillary and incidental fees are charged to students.

THE PROBLEM

The Student Choice Initiative Hurts Critical Services

The provincial government developed the Student Choice Initiative (SCI) without engaging in thoughtful consultation with a broad and diverse set of post-secondary stakeholders. This led to confusion when the SCI came into effect, as well as inconsistent applications of its guidelines. The SCI has made it more difficult for student associations to provide students with employment, experiential learning, and other engagement opportunities. It has also hindered students’ ability to set fees through collective democratic processes.

Deeming student services as “non-essential” puts the existence of these services at risk and defunds baseline student services — i.e. services that students need to safely participate in their post-secondary education. Students who are a part of marginalized communities have been impacted disproportionately by cuts in services and supports that they rely on for their well-being. Further, by deeming student media “non-essential,” the SCI has endangered the ability of campus media to effectively investigate and hold institutions and student associations accountable, as well as students’ ability to engage and express their opinions.

Insufficient Ancillary Fee Guidelines

Ancillary fees are a complicated policy area that require a distinct, clear, robust policy (separate from the tuition fee framework). The current *Tuition Fee Framework and Ancillary Fee Guidelines* focus much of their energy on tuition, neglecting the complexity and importance of ancillary fees. The current ancillary fee guidelines do not appropriately reflect the balance between provincial standardization and institutional differences.

Students need access to detailed information about ancillary for trust to develop between students and their post-secondary institutions. Students should have the ability to participate in the high-level management of the services they pay for. Unfortunately, post-secondary institutions have retained significant control over which student services are funded and to what degree.

Unregulated Incidental Fees

Housing prices can be set at fully autonomous rates by universities, which could be seen as a revenue-generating mechanism. Yearly turnover and generally inexperienced residence users can mean there is little market pressure to improve housing quality.

Some post-secondary institutions charge fees for withdrawing from classes, and these fees are unregulated. This can disproportionately affect students forced to withdraw from courses because of physical or mental health issues, as well as students who withdraw for financial reasons.

Administrative fees are widespread and difficult to regulate on a fee-by-fee basis. Moreover, there is no provincial regulation that prevents universities from generating revenue from administrative fees, which should only be in place to cover the cost of administering services to students.

Often, the provincial government has no mechanism to mandate student control of services funded by fees paid to third parties. Many students feel uncomfortable with third parties receiving student dollars in cases where there is little or no student control over how the organization operates.

Costly Learning Materials and Resources

Students are required to purchase expensive textbooks, courseware, and digital evaluation packages in compulsory courses. Courseware for compulsory courses often changes on an annual basis, which means it loses its resale value. Further, the exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines* for digital learning materials that are property of the student allows post-secondary institutions to require digital online evaluation packages in compulsory courses. Similarly, students are often required to pay fees for field trips in compulsory courses.

Students are often unduly charged for pursuing work-integrated learning. The exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines* for work placement fees allows post-secondary institutions to charge high amounts for placement services, creating an inequity among students wishing to partake in work-integrated learning.

Lack of Transparency & Accountability

The purposes of ancillary fees are often poorly communicated to students, limiting transparency and institutional accountability. The provincial term “compulsory non-tuition-related ancillary fee” is not used consistently at every Ontario post-secondary institution, which leads to inefficiency and a lack of transparency. Further, it is often unclear whether fees are being charged on a per-term, per-course/credit, or flat-fee basis. The payment of ancillary fees is sometimes done in an inconsistent manner through many different offices and payment forms, which further contributes to a lack of transparency and accountability.

Student-sponsored endowment funds are sometimes used to cover expenses that ought to be covered by tuition. Further, the administration of student-sponsored endowment funds is often opaque, and information is often not readily available to contributors. Most student-sponsored endowment funds are funded by automatically assessed fees, which many students do not know are refundable.

There must always be a clear protocol for establishing or increasing ancillary fees, and this protocol must be easily accessible to all members of a post-secondary community. Moreover, ancillary fees need to be reviewed regularly to ensure they remain relevant and necessary. Unfortunately, ancillary fee protocol structures and review practices are not always transparent and accountable.

Ancillary fees, regardless of the way they are negotiated, or the number of post-secondary institutions involved, should follow consistent guidelines without exemption, and they should be implemented only after consulting with student associations. However, system-wide and vendor fees are exempt from the current requirements under the *Tuition Fee Framework and Ancillary Fee Guidelines* and are often implemented without student approval or consultation. These fees represent a way for post-secondary institutions to unfairly circumvent student approval of compulsory ancillary fees.

Inequitable Cost-Sharing

Student-funded, compulsory ancillary fees have been increasingly used as a source of operating revenue by universities in Ontario, and fee amounts have increased substantially above inflation over the past two decades. Students are unfairly burdened with financing access to services and goods that benefit the entire university community, despite not having oversight over capital projects.

Baseline student services, which include mental health counselling services and sexual violence centres, are often funded in part or solely by ancillary fees. Student services (baseline and non-baseline) that support student development have become almost completely dependent on ancillary fees, which does not reflect a system of fair cost-sharing.

RECOMMENDATIONS

Rescind or Improve the Student Choice Initiative

The provincial government should rescind the Student Choice Initiative.

Failing this, the Ministry of Colleges and Universities should develop an improved ancillary fee framework based on the concerns and recommendations in this policy paper. This includes engaging in open consultations with a broad and diverse set of post-secondary stakeholder groups. It also includes allowing student associations and post-secondary institutions to determine the mandatory and non-mandatory status of fees through democratic processes. Moreover, the government should mandate that all baseline student service fees, as defined in this paper, be deemed “essential” across all institutions. Similarly, the government should mandate that ancillary fees which fund services including, but not limited to, peer support networks, campus media, food bank, legal services, clubs administration, and governance be deemed “essential” across all institutions. Finally, the Minister of Intergovernmental Affairs should advocate to the Canada Revenue Agency and the Minister of National Revenue that they should deem all ancillary fees tax exempt.

The provincial government should also allow students to decide, through democratic processes, whether a “non-essential” fee under the Student Choice Initiative is mandatory or non-mandatory for their student body.

Create Standalone Ancillary Fee Guidelines

The provincial government should separate the Ancillary Fee Guidelines from the Tuition Fee Framework, creating standalone ancillary fee guidelines. When constructing the standalone ancillary fee guidelines, the government should engage in robust consultation with a broad and diverse set of student groups, student associations, and post-secondary institutions.

All non-tuition ancillary fees should be overseen by bodies consisting of a majority of democratically elected or appointed student membership. The provincial government should mandate, through these standalone ancillary fee guidelines, that students be given the opportunity to sit on the governing bodies of university services funded by ancillary fees.

Regulate Incidental Fees

The provincial government should mandate, through standalone ancillary fee guidelines, that all university residences or housing systems have an oversight body with student representation. The government should also mandate that this oversight body shall be responsible for compiling a periodic public report on the state of the housing system, including a breakdown of aggregate revenues, operating expenditures, and contributions to any housing capital fund.

The provincial government should, through standalone ancillary fee guidelines, ban course cancellation fees for changes in course configurations in the first four weeks of class. The provincial government should also ban course withdrawal fees when students have to withdraw due to medical or mental health reasons.

Administrative fees should be charged at a commensurate or lower rate than the cost of providing the services funded by those fees, and the provincial government should mandate that this be the case. The government should also establish that before the introduction of an administrative fee, a rudimentary assessment of the cost of providing that service should be conducted. These assessment documents should be available to any student upon request.

The provincial government should also establish that any fee not otherwise categorized by the standalone ancillary fee guidelines or categorized by a mutual agreement of a post-secondary institution and its student associations, shall be considered a miscellaneous fee and be treated identically to an administrative fee. If a fee is classified as miscellaneous, the government should mandate that this status must remain until a stakeholder requests that the Ministry of Colleges and Universities determine the classification of the fee into another category.

Finally, the provincial government should mandate that student associations be given the ability to determine the democratic processes they will use to decide if they approve any third-party fee when they first enter into agreement with third-party organizations. These processes should have to be voluntarily agreed to by each student association and third-party every three years. Further, these processes should take precedent over any other process mandated by a third-party organization.

Make Learning Materials Affordable

The provincial government should mandate, through standalone ancillary fee guidelines, that post-secondary institutions establish a formal and accessible complaint system or mechanism for students who are being charged fees they suspect contravene institutional policy. The government should also review the use of digital learning materials and evaluation tools and create best practices for future use of these tools, with respect to accessibility and quality of education. Further, the government should invest in open educational resources (OERs) and other online materials for instructors and incentivize postsecondary institutions to do the same. Similarly, the government should incentivize instructors to use open educational resources (OERs). To minimize instructor conflict of interest, the provincial government should task the Higher Education Quality Council of Ontario (HEQCO) with reviewing the accessibility, affordability, and quality of instructional materials developed by instructors.

The provincial government should invest in work-integrated learning programs on campuses to reduce these programs' dependency on student ancillary fees. The government should mandate that students in work-integrated learning programs be given a detailed explanation of how work-integrated learning fees are used. The government should also mandate that fees for work placements be commensurate or lower than the cost of providing those work placements to students. Finally, the government should establish a tuition-independent cap for work-integrated learning fees across the province.

The provincial government should mandate that institutions provide an alternative subsidized rental or used option when compulsory courses require students to purchase learning materials and/or clothing. The government should also invest in a program that provides envelope funding for institutions to offer affordable rental physical learning materials to students.

The provincial government should provide envelope funding to post-secondary institutions, which, in the form of bursaries, covers field trip costs in compulsory courses for students with demonstrated financial need. Similarly, the provincial government should mandate that institutions provide students with alternatives to field trips so that they can complete their compulsory course without academic penalty.

Increase Transparency & Accountability

The provincial government should establish standalone ancillary fee guidelines, distinct from the tuition fee framework, in consultation with post-secondary institution administrators, student association representatives, and the Council of Ontario Universities (COU). The government should mandate, through these standalone ancillary fee guidelines, that all fiscal material, including budgets, audits, and explanatory breakdowns of ancillary fees, be publicly disclosed in a way that is readily available to students. Further, the government should mandate that the term “compulsory non-tuition-related ancillary fee” be used consistently across the sector. Finally, the government should mandate that all post-secondary institutions levy and collect all ancillary fees through a centralized online system.

Student-sponsored endowment funds should be considered non-essential fees and thus subject to the same approval mechanisms stipulated in the standalone ancillary fee guidelines recommended in this policy paper. The provincial government should mandate, through these guidelines, that independent, student-sponsored endowment funds be required to publish their financial information and a list of sponsored projects in a way that is readily available to students who contribute to the fund. Disbursement of student-sponsored endowment funds should primarily be controlled by students.

The provincial government should mandate that all post-secondary institutions be required to maintain an institutional ancillary fee protocol or protocols, agreed to by both the institution and the institution’s student association(s), which would include terms of categorization, approval, and review of various fees, subject to provincial guidelines. The government should also develop an institutional ancillary fee protocol structure that can be provided as a best practice example for post-secondary institutions. This structure should establish high-level roles and procedures for fee recommendations, approvals, collection and remittance. Finally, the government should introduce restrictions that ban universities from deducting (from the fees collected) administrative expenses for the collection or remittance of those fees.

The provincial government should eliminate both the system-wide and vendor fee exemptions from the *Tuition Fee Framework and Ancillary Fee Guidelines*.

Promote Equitable Cost-Sharing

The provincial government should increase operational funding so that university operating budgets do not rely disproportionately on revenue from ancillary fees. The government should also create priority funding for projects that enhance student development, such as student centres, health centres, and athletic facilities. Further, the provincial government should ensure that investment required into deferred maintenance does not exclude spaces originally funded through student ancillary fees. Finally, the government should mandate that, for all student-ancillary-funded spaces, agreements be made between post-secondary institutions and student associations to establish a management structure of the project that prioritizes student concerns and priorities.

The provincial government should fund baseline student services and supports in an effort to provide a minimum standard of safety and well-being at post-secondary institutions across the province, as institutions should not rely on students to be the primary funders of baseline fees. Similarly, the government should also fund non-baseline fees as they are critical to increasing student success, employment opportunities, and student satisfaction with their post-secondary experience.

INTRODUCTION

The provincial government defines ancillary fees as any “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 pays for a service or product.”¹ Ancillary fees fund services and supports that promote a safe, fulfilling, well-rounded post-secondary experience through programming such as student associations, equity services, sexual health centres, student-run food banks, and peer support services.

In addition to ancillary fees, post-secondary students are charged incidental fees for a variety of services, including housing and residence, course withdrawal, and administrative tasks. In many cases, these fees are unregulated and may be used by post-secondary institutions to generate profit rather than to cover the cost of providing incidental services to students.

In January 2019, the provincial government implemented the Student Choice Initiative, which deemed some ancillary fees “essential” and some “non-essential,” and gave students the ability to opt out of paying non-essential fees. Essential fees include student transit passes and financial aid offices, while non-essential fees include student associations and campus media.² Services funded by non-essential fees have seen their funding cut, threatening the quality and existence of their operations moving forward.

In November 2019, the Ontario Divisional Court issued a ruling quashing the Student Choice Initiative, citing that it was implemented without legislative authority and that it infringed upon post-secondary institutions’ autonomy.³ At the time of this publication, however, it remains possible that the provincial government will appeal this court decision or enact legislation granting them the authority to either reimplement the Student Choice Initiative or implement a modified version.

This policy paper highlights ongoing issues related to ancillary and incidental fees. While its initial focus is on the Student Choice Initiative, it goes on to make recommendations aimed at creating standalone, comprehensive ancillary fee guidelines, regulating incidental fees, making textbooks and other learning materials more affordable, promoting cost-sharing, and increasing transparency and accountability for the collection, management, and use of ancillary fees.

¹ “Tuition Fee Framework and Ancillary Fee Guidelines: Publicly-Assisted Universities,” Ministry of Training, Colleges and Universities, 2019, retrieved from: <http://www.tcu.gov.on.ca/pepg/mtcu-university-tuition-framework-guidelines-mar2019-en.pdf>.

² Ibid.

³ Westoll, Nick. “Court Quashes Ontario Government’s ‘Student Choice Initiative’.” Global News. Global News, November 22, 2019. <https://globalnews.ca/news/6202863/student-choice-initiative-ontario-divisional-court-decision/>.

DEFINITIONS

Administrative Fee: A nominal fee charged by post-secondary institutions to cover the costs of administrative processes.

Ancillary Fee: An ancillary fee is a fee imposed or administered by a given post-secondary institution, or one of its constituent parts or its federated or affiliated institutions, in addition to regular tuition fees, which a student pays for a service or product.

Compulsory Ancillary Fee: 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.

Ancillary Fee Protocol: An agreement between a post-secondary institution and student associations of that institution with regard to fee setting and collection processes.

Ancillary Fee Guidelines/Minister's Binding Directive: Refers to the *Tuition Fee Framework and Ancillary Fee Guidelines for Publicly-Assisted Universities*

Essential Ancillary Fee: These are ancillary fees that post-secondary students are required to pay to cover the cost of essential services, as defined by the provincial government in the *Tuition Fee Framework and Ancillary Fee Guidelines*.

Non-Essential Ancillary Fee: These are ancillary fees that are not included as an “essential service” in the *Tuition Fee Framework and Ancillary Fee Guidelines*. Post-secondary students may choose to opt in or opt out of paying these fees.

Student Service: This is a service that is beyond the core mission of universities but that provides benefits and support to students. Typically, these services are not capital intensive and are funded almost entirely by students.

Student Service Fee: This is a fee that provides funding for a student service, as defined above.

Baseline Student Service: This refers to a student service, as defined above, that OUSA believes post-secondary students require in order to safely participate in their education. This includes but is not necessarily limited to mental health counselling, sexual violence centers and support services, supports for students with disabilities, and peer support services. In some cases, these fees are not considered “essential” under the *Tuition Fee Framework and Ancillary Fee Guidelines*.

Baseline Student Service Fee: This is a fee that provides funding for a baseline student service, as defined above.

Incidental Fees: These are fees that broadly encompass either services provided to most students equally, services that are capital-intensive, or minimal administrative fees. Examples include housing and residence and course withdrawal fees.

Mandatory Fee: For the purposes of this policy paper, this is a fee that: (1) the provincial government has designated as “non-essential” in the *Tuition Fee Framework and Ancillary Fee Guidelines*; and (2) students, through a vote, have designated as “**mandatory**” on their respective campuses, despite the provincial government’s designation. *In this policy paper, “mandatory fee” is not synonymous with “essential fee.”*

Non-Mandatory fee: For the purposes of this policy paper, this is a fee that: (1) the provincial government has designated as “non-essential” in the *Tuition Fee Framework and Ancillary Fee*

Guidelines; and (2) students, through a vote, have designated as “**non-mandatory**” on their respective campuses, despite the provincial government’s designation. *In this policy paper, “non-mandatory fee” is not synonymous with “non-essential fee.”*

Oversight/Advisory Body: A committee empowered to provide guidance on ancillary fees and the services they fund. These bodies have substantial access to information and the ability to make recommendations to the management of organizations responsible for spending ancillary fees. These bodies may also have a role in assessing or determining fee levels, long-term vision or goals, or other incorporations that allow for influence on fee levels, collection, goals, or spending.

Standalone Ancillary Fee Guidelines: A proposed replacement by OUSA for the *Tuition Fee Framework and Ancillary Fee Guidelines for Publicly-Assisted Universities*, which broadly governs ancillary fees in Ontario, including categories of ancillary fees in Ontario, roles of students and universities in determining fee levels.

Student Association Fees: These are fees levied by student associations for any purpose other than for transfer to a third-party organization.

Student Association: A body governed by democratic principles, which has a set of bylaws, is incorporated under business legislation for the purpose of representing or serving students, and has a broad mandate to represent university students to the university. When viewed in combination at an individual institution, student associations should represent all students who are eligible to be represented by a student organization. In this policy paper, the term “student association” is synonymous with “student union.”

Student Choice Initiative: The regulatory scheme regarding ancillary fee assessment in Ontario under the Minister’s Binding Directive, which classified ancillary services as either essential or non-essential and gave post-secondary students the ability to opt out of paying fees non-essential services.

Student Representative: A student elected in an election held by the university or student association, or appointed by the student association or an officer of the student association, to serve on an oversight or advisory body for a service.

Textbooks: In this policy, the term “textbook” includes, in addition to conventional textbooks, other print materials, such as novels or academic journals, that instructors may require or recommend that students purchase for their courses.

Third-Party Fees: Fees that fund an organization other than a student association or a vendor.

Tuition Fee Framework and Ancillary Fee Guidelines: This is a government document intended to provide direction on how to implement the tuition and ancillary frameworks set by the Ministry of Colleges and Universities.

Tuition-Related Ancillary Fee: This is an ancillary fee which is levied to cover the costs of items that are normally paid for out of an institution’s operating or capital revenue. Institutions are prohibited from charging compulsory tuition-related ancillary fees to students.

Non-Tuition-Related Ancillary Fee: This is an ancillary fee which is levied to cover the costs of items that are not normally paid for out of an institution’s operating or capital revenue.

Vendor Fees: This term refers to fees for materials or services under contract where the institution or student association acts as broker. These are fees paid by students to the university; they do not produce net revenue for the university, but instead are set and levied through an agreement with a vendor. In these cases, the institution is neither the manufacturer nor supplier of the material or service being purchased. Similarly structured fees, where student governments serve in the “broker” role, are considered student government fees.

STUDENT CHOICE INITIATIVE

RESCIND THE STUDENT CHOICE INITIATIVE

Principle: Ancillary fees help provide predictable and useful services and opportunities at post-secondary institutions.

Principle: Students should be able to choose which ancillary fees they pay by participating in democratic processes through student associations and post-secondary institutions.

Principle: Financial or socioeconomic status should not determine the accessibility of programs and educational supports, as these enhance students' post-secondary experience.

Principle: Students who are part of marginalized communities should have access to services necessary to their well-being.

Principle: Student associations provide an array of programming, services, employment, and experiential education opportunities that are integral to the undergraduate and professional student experience.

Concern: The provincial government implemented the Student Choice Initiative without consultation with a broad and diverse set of post-secondary sector stakeholders.

Concern: Unpredictable financing under the Student Choice Initiative threatens the existence of student services offered by ancillary fees.

Concern: As a result of the Student Choice Initiative, there is a high degree of unpredictability regarding ancillary fee collection amounts.

Concern: Allowing individualized selection of ancillary fees can harm the stability of services democratically decided on by the student body.

Concern: As a result of the Student Choice Initiative, students who are a part of marginalized communities are being impacted disproportionately by cuts in services and supports.

Concern: As a result of the Student Choice Initiative, the financial and economic ability of student associations to provide employment, experiential learning, and other engagement opportunities is severely diminished.

Recommendation: The provincial government should rescind the Student Choice Initiative.

In January 2019, the provincial government introduced the Student Choice Initiative, giving students the ability to opt out of fees deemed “non-essential” by the government. These fees include student associations, sexual health centres, student-run food banks, and equity services. Unfortunately, the Student Choice Initiative was implemented without broad consultation with a diverse set of stakeholders; as a result, it was met with confusion and inconsistent application across the province.

Ancillary fees help fund predictable, useful services and opportunities that many post-secondary students rely on for their well-being. All students should have access to the programs and supports they need, regardless of their socioeconomic background. While services deemed “non-essential” may be optional for some, they are necessary for others. For example, while food bank services may go unused by students from high-income families, these services are often vital for low-income students. If students opt out of paying this fee, food bank services will likely be forced to reduce or suspend operations — hurting low-income students. Under the pre-Student Choice Initiative model, all students paid into these (and other) services with the understanding that, even if they did not need to use them, there were other students who

would. (This is similar to how all Canadians pay taxes to fund healthcare services, despite the fact that not all Canadians will need to use these services to the same degree.) Under the Student Choice Initiative, funding for important services has become unpredictable, making it difficult to maintain operations consistently and offer students the services they need.

Students already were already able to choose, through democratic processes, which services received funding at their institutions. Before the Student Choice Initiative, students participated and voted in referenda to establish fees. For example, at Queen's University, students voted on the introduction of fees through referenda conducted by the Alma Mater Society.⁴ Ancillary fees support a diverse set of programs that students themselves have deemed, through democratic processes, to be beneficial. Allowing individualized selection of ancillary fees harms the stability of services democratically decided on by the student body.

Student associations, which have had their funding reduced by the Student Choice Initiative, provide an array of programming, services, employment, and experiential education opportunities that are integral to the undergraduate and professional student experience. These organizations provide services that students rely on for their well-being. The McMaster Students Union, for example, provides students with childcare services, diversity services, a pride community centre, and peer support services.⁵ Further, student associations provide on-campus employment for students, which helps them prepare for the careers that await them after post-secondary. In fact, they are the largest employer of students at many North American campuses.⁶ At a time when university administrations are reducing staff due to recent tuition cuts, and as students face decreased OSAP awards, these on-campus jobs are critical for students' financial stability.

To better understand the risk that the Student Choice Initiative poses to student associations and their services, one can look to Australia's Voluntary Student Unionism structure. In 2005, Australia passed *The Higher Education Support Amendment (Abolition of Compulsory Up-front Student Union Fees)*, which created voluntary student unionism (VSU) across Australia, effective July 2006. The Bill made approval as a higher education provider and grants contingent on the fact that higher education providers could not require their students to be a member of a student association and thus could not make their students pay compulsory fees for "facilities, amenities or services that are not of an academic nature."⁷ Similar to the Student Choice Initiative, measures were taken to protect services that the university administration provided by deeming them essential and exempt. However, student associations and the services they provided all became optional.

The consequences of this legislative decision were vast. There was substantial or total job loss at almost all student associations.⁸ University administrations at many schools began to take direct control of student services including advocacy, support programs, and activities.⁹ This resulted in a decrease of quality and new conflict of interest issues.¹⁰ While some elements of student representation appeared to remain at most universities, the quality was diminished due to reduced resources, a lack of support staff, and loss of autonomy.¹¹ Student representation remained in theory but not in practice. The consequences of voluntary student unionism in Australia foreshadow the potential future of student services in Ontario under the Student Choice Initiative: limited, beyond student control, of reduced quality, and controlled by the university administration.

⁴ "AMS Elections and Referenda Policy." Alma Mater Society of Queen's University. Accessed December 5, 2019. p 24. <https://myams.org/wp-content/uploads/2018/04/ElectReferend-20180329-1.pdf>

⁵ "Services Directory." McMaster Students Union. Accessed December 5, 2019. <https://www.msumcmaster.ca/services-directory?page=1>

⁶ Lane, Thomas, and Brett Perozzi. "Student Engagement and College Unions." *New Directions for Student Services* 2014, no. 145 (2014): 27-37.

⁷ "The Impact of Voluntary Student Unionism on Services, Amenities and Representation for Australian University Students" *Department of Education, Employment and Workplace Relations*, (2008), Retrieved from <https://apo.org.au/node/4022>.

⁸ Hastings, Graham, "The Impact of Federal VSU Legislation," *NUS Research*, (2007), Retrieved from <http://studentunion.ca/international/australia/NUS%20First%20Annual%20Report%20Into%20The%20Impact%20of%20Federal%20VSU%20Legislation%20-%20October%202007.pdf>

⁹ Ibid.

¹⁰ Ibid.

¹¹ Ibid.

The provincial government should rescind the Student Choice Initiative. Services deemed “non-essential” are often, in fact, necessary for underprivileged students to have safe, healthy post-secondary experiences. Moreover, they help provide a well-rounded, fulfilling post-secondary education experience for all students. These services need consistent, predictable funding to continue operating effectively, and the Student Choice Initiative prevents this.

IMPROVEMENTS TO THE STUDENT CHOICE INITIATIVE FRAMEWORK

Principle: Ancillary fees help provide predictable and useful services and opportunities at post-secondary institutions.

Principle: Financial or socioeconomic status should not determine the accessibility of programs and educational supports, as these enhance students’ post-secondary experience.

Principle: Students who are part of marginalized communities should have access to services necessary to their well-being.

Principle: Student associations provide an array of programming, services, employment, and experiential education opportunities that are integral to the undergraduate and professional student experience.

Principle: Post-secondary institutions and student associations need to be aware of the annual changes in the ancillary fee structure in order to plan and execute their operations for the upcoming year.

Concern: As a result of the Student Choice Initiative, post-secondary institutions and student associations are unable to predict annual changes in the ancillary fee structure.

Concern: The current ancillary fee framework leaves ancillary fees structured in a way that difficult for students to comprehend.

Concern: Moving forward, there is no guarantee of an open consulting process with a broad and diverse set of post-secondary stakeholder groups.

Concern: As a result of the Student Choice Initiative, students who are a part of marginalized communities are being impacted disproportionately by cuts in services and supports.

Recommendation: In the event that the provincial government does not rescind the Student Choice Initiative, the Ministry of Colleges and Universities should develop an improved ancillary fee framework based on the concerns and recommendations in this section and this policy paper as a whole.

Recommendation: The provincial government should allow student associations and post-secondary institutions to determine the mandatory and non-mandatory status of fees through democratic processes.

Recommendation: The provincial government should engage in open consultations with a broad and diverse set of post-secondary stakeholder groups.

Recommendation: The provincial government should mandate that all baseline student service fees be deemed “essential” across all institutions.

Recommendation: The provincial government should mandate that ancillary fees services including, but not limited to, peer support networks, campus media, food bank, legal services, clubs administration and governance be deemed “essential” across all institutions.

Recommendation: The Minister of Intergovernmental Affairs should advocate to the Canada Revenue Agency and the Minister of National Revenue that they should deem all ancillary fees tax-exempt.

If the provincial government does not rescind the Student Choice Initiative (SCI), the Ministry of Colleges and Universities should develop an improved ancillary fee framework. Under the current *Tuition Fee Framework and Ancillary Fee Guidelines*, institutions and student associations need to navigate a great deal of ambiguity in terms of what qualifies as an essential or non-essential fee. The existing framework inadequately describes these categories, which creates confusion among students and within university administrations, as well as inconsistent application of the guidelines across the province.

For institutions and student associations to plan programming and services effectively, they need a clear and comprehensive ancillary fee framework. The current framework has made it difficult for institutions, student associations, and external vendors or service fee collectors to predict changes to ancillary fee amounts from one year to the next, and the initial consultation for deeming fees either “essential” or “non-essential” has posed several challenges for these decision-making bodies. For this reason, the provincial government should establish a set timeline wherein relevant post-secondary stakeholders are made aware of changes to the ancillary fee framework before they are made. This would give stakeholders the ability to prepare effectively for the upcoming year.

When updating the ancillary fee guidelines, the provincial government should engage in robust consultation with a broad, diverse set of post-secondary stakeholder groups. There was minimal consultation before the current Student Choice Initiative was implemented and, unfortunately, there is nothing in the current framework that guarantees or even suggests consultation moving forward. The most important stakeholder to consider here is students: ultimately, students are often the most hurt by changes to ancillary fee structures.

Further, the provincial government should mandate that all baseline student service fees, as defined in this policy, be deemed “essential” across all institutions. For many students, these services are necessary for a safe, healthy post-secondary experience, and the Student Choice Initiative has put the funding and operations of these services in jeopardy. In particular, students from marginalized communities have been disproportionately affected by cuts to these services and supports.

Finally, students continue to pay unnecessary taxes on ancillary fees. To remedy this, the Minister of Intergovernmental Affairs should lobby the Canada Revenue Agency and the Minister of National Revenue to deem all ancillary fees tax-exempt.

STUDENT DEMOCRATIC ASSESSMENT OF NON-ESSENTIAL FEES

Principle: Students should be able to vote on whether their student body is required to opt into an ancillary fee, regardless of the provincial government’s designation of that fee as “non-essential.”

Principle: Clubs and other programming funded by ancillary fees help students apply knowledge learned in the classroom and gain transferable skills to help them enter the job market.

Principle: Student associations provide an array of programming and services that are integral in cultivating a healthy, well-rounded undergraduate student experience.

Principle: Students should be able to democratically decide the level of fees that are set for the entire student body.

Principle: Student services must be accessible to all students in need.

Principle: Campus media hold post-secondary institutions and student associations accountable to all their members, making them integral in the accountability process.

Concern: The Student Choice Initiative (SCI) hinders students’ ability to set fees through collective democratic processes.

Concern: Deeming student services “non-essential” puts the existence of these programs at risk and fundamentally disenables a baseline student service for students.

Concern: The Student Choice Initiative, in deeming student media “non-essential,” endangers the ability of campus media to effectively investigate and hold institutions and student associations accountable.

Concern: The Student Choice Initiative jeopardizes students’ ability to use campus media as an outlet to engage and express their opinions.

Recommendation: The provincial government should allow the mandatory/non-mandatory status of non-essential fees to be determined democratically by students.

Determining whether a fee qualifies as essential or non-essential has critical implications in the implementation of the Student Choice Initiative framework and, consequently, the quality of post-secondary education in Ontario. This distinction determines which budgets will remain stabilized and secure and which will remain uncertain. Many school clubs, student associations, campus food banks, and campus media have been deemed “non-essential” by university administrations. This assessment ignores the fact these services provide fundamental qualities to the student experience and were democratically decided on by students.

Ancillary fees fund clubs and other experiential learning opportunities. These opportunities help students develop their professional portfolio by teaching them transferable soft skills and field-specific knowledge; they also allow students to apply their knowledge outside of the classroom. According to a 2016 study by the Business Council of Canada, Canadian hiring managers consider teamwork and collaboration skills the most important quality when evaluating an entry-level candidate.¹² This quality was valued above functional knowledge by a margin of over ten percent, highlighting the importance of soft skills in today’s job market. Clubs and similar programming promote and teach soft skills that employers are looking for.

Student associations are a valuable part of students’ post-secondary experiences. They continue to fulfil their original purpose of providing student representation and advocacy to both internal and external stakeholders; but now, they also provide student programming, crucial services (transit, dental, healthcare,

¹² Hewitt, Aon, “Developing Canada’s Future Workforce: A Survey of Large Private-Sector Employers” *Business Council of Canada* (2016): 4, <https://thebusinesscouncil.ca/wp-content/uploads/2016/03/Developing-Canadas-Future-Workforce.pdf>

and more), and campus businesses (pubs, convenience stores, etc.). Student associations also offer campus events that increase students' engagement and, in turn, their academic and career success.¹³

Student associations also foster leadership through on-campus jobs, executive roles, and volunteer opportunities. Employers often seek students who have filled these leadership roles, because these students demonstrate evidence of key knowledge and workplace skills as college graduates.¹⁴ Student associations also inspire student civic engagement.¹⁵ While young people are beginning to engage more with politics, youth voter apathy remains a problem. The Samara Centre for Democracy (2019) reported that, while youth voting increased by forty percent in 2015 from the prior federal election, youth voter turnout was still at only fifty-seven percent, about ten percent below the average voter turnout overall.¹⁶

Campus food banks are necessary to address the issue of food insecurity at Ontario's post-secondary campuses. Many post-secondary students suffer from food insecurity, in part due to tuition, housing, and food costs.¹⁷ According to a Meal Exchange study, nearly two in five (39%) students surveyed experienced some degree of food insecurity.¹⁸ The study highlighted that food insecurity has consequences on students' well-being. Nearly one in four (24%) of students struggling with food insecurity reported that their physical health was affected, while one in five (20%) reported that their mental health had been impacted by food insecurity.¹⁹ At the University of Alberta, food bank usage doubled between 2007 and 2010.²⁰ At the University of Ottawa, one in ten students used the campus food bank in 2012.²¹ At Ryerson University, over 2,500 students accessed emergency food relief during the 2013-2014 school year.²² There has also been a noticeable growth in campus-based hunger-relief programs across Canada over the past decade — from 51 programs in 2004 to 104 in 2016.²³ This growth signifies the demand for and importance of food banks and related programs.

Campus media hold institutions and student associations responsible and help ensure transparency, making it an integral service in the accountability process. For example, an independent newspaper at Ryerson University, *The Eye-opener*, published an independent investigative report on bed bugs in one of the school's buildings; the institution had previously denied that this was an issue.²⁴ The newspaper's story garnered coverage from Global News and CTV News, which helped ensure that the school responded to the issue.

Deeming student services “non-essential” threatens the likelihood that these programs will continue to exist. The services that do not cease to exist will likely still come at a cost to students, through vendor fees or raised tuition, but such costs will no longer be communicated to students beforehand. It is also of critical importance to promote the accessibility of these programs to all students who may benefit from them. Food banks and related programs being deemed “non-essential” puts the existence of these programs at risk and fundamentally disassembles a critical service for students. These services already struggle from restricted funding, and subsequently are required to take financially defensive measures

¹³ Lane, Thomas, and Brett Perozzi. “Student Engagement and College Unions.” *New Directions for Student Services* 2014, no. 145 (2014): 27–37.

¹⁴ Ibid.

¹⁵ Ibid.

¹⁶ Ryan, Callista, and Michael Morden. “You Have Our Attention: Youth Political Engagement in Canada,” *The Samara Centre for Democracy* (2019): <https://www.samaracanada.com/research/active-citizenship/you-have-our-attention>

¹⁷ Silverthorn, Drew “Hungry for knowledge: Assessing the prevalence of student food insecurity on five Canadian campuses,” *Meal Exchange*, (2016), Retrieved from: <http://mealexchange.com>

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ “Context: Student Hunger and Food Insecurity,” Food Secure Canada. Accessed October 2019. https://foodsecurecanada.org/sites/foodsecurecanada.org/files/students_food_insecurity.pdf

²¹ “Context: Student Hunger and Food Insecurity,” Food Secure Canada. Accessed October 2019. https://foodsecurecanada.org/sites/foodsecurecanada.org/files/students_food_insecurity.pdf

²² Ibid.

²³ Silverthorn, Drew “Hungry for knowledge: Assessing the prevalence of student food insecurity on five Canadian campuses,” *Meal Exchange*, (2016), Retrieved from: <http://mealexchange.com>.

²⁴ Valerie Dittrich et al., “Stories We Broke,” *The Eyeopener*, November 13, 2019, <https://theeyeopener.com/stories-we-broke/>

like restricting access to a specified amount of times per week or having food of a lower nutritional quality.²⁵

Similarly, in deeming student media “non-essential,” the Student Choice Initiative has endangered the ability of campus media to effectively investigate and hold institutions and student associations accountable. Without these media outlets, students will struggle to find public mediums to express their opinions about on-campus issues, as these often fall outside the realm of local media’s interests. Emma McPhee, the Vice President of Canadian University Press, a national co-operative owned and operated by student newspapers across the country, spoke on the threat that the Student Choice Initiative poses to campus media, saying that without student levees, “they may well have to shut down.”²⁶

The Student Choice Initiative, in its current form, hinders students’ ability to set fees through collective democratic processes. Since university administrations are able to determine the fee structure and which fees qualify as “essential” or “non-essential,” they are able to include their own costs as essential but exclude fees for services that greatly enhance the student experience. A lack of guaranteed income threatens the existence of clubs, campus food banks, campus media, and other services. It is for this reason that Quebec and British Columbia have each passed formal legislation to protect student associations and their funding.²⁷

For these reasons, the provincial government should allow the mandatory/non-mandatory status of non-essential fees to be determined democratically by students. In other words, students should be able to decide, through a vote, that despite the provincial government’s designation of an ancillary fee as “non-essential,” that fee must be paid by students at their institution. This change will help ensure students are getting the services they need during their post-secondary education, and at the quality they expect.

²⁵ Silverthorn, Drew “Hungry for knowledge: Assessing the prevalence of student food insecurity on five Canadian campuses,” *Meal Exchange*, (2016), 10-11, retrieved from: <http://mealexchange.com>.

²⁶ “No One Likes Paying Student Fees, but Some Campus Clubs Say Axing Them Is a ‘Direct Attack’ | CBC News,” CBCnews (CBC/Radio Canada, January 18, 2019), retrieved from: <https://www.cbc.ca/news/canada/toronto/ontario-tuition-osap-fees-campus-clubs-1.4982863>

²⁷ College and Institute Act. Accessed December 5, 2019.

http://www.bclaws.ca/civix/document/id/complete/statreg/96052_01#section21;
Légis Québec. Accessed December 5, 2019. <http://legisquebec.gouv.qc.ca/en/ShowTdm/cs/A-3.01>.

STANDALONE ANCILLARY FEE GUIDELINES

STANDALONE ANCILLARY FEE GUIDELINES

Principle: Ancillary fees require a distinct, clear, and robust policy separate from the tuition fee framework.

Principle: Ancillary fees require a balance of provincial standardization and respect for institutional differences.

Concern: The current *Tuition Fee Framework and Ancillary Fee Guidelines* focus heavily on tuition, neglecting the complexity and importance of ancillary fees.

Recommendation: The provincial government should separate the Ancillary Fee Guidelines from the Tuition Fee Framework, creating standalone ancillary fee guidelines.

Recommendation: When constructing the standalone ancillary fee guidelines, the provincial government should engage in robust consultation with a broad and diverse set of student groups, student associations, and post-secondary institutions.

Given the complexity of ancillary fees and the effect they have on the student experience, the current *Tuition Fee Framework and Ancillary Fee Guidelines* do not give these fees sufficient attention. The provincial government should, therefore, create standalone ancillary fee guidelines that appropriately reflect the complexity and importance of ancillary fees. OUSA has made this recommendation in the past, and it has become increasingly relevant with the introduction of the Student Choice Initiative. These guidelines should take appropriate measures to balance the need for provincial standardization of ancillary fees with the unique fee structures that exist at each post-secondary institution across the province.

When constructing the standalone ancillary fee guidelines, the provincial government should engage in robust consultation with a broad and diverse set of student groups, student associations, and post-secondary institutions. The Student Choice Initiative was implemented without this sort of extensive consultation, which has led to confusion and inconsistent application of its guidelines.

STUDENT CONTROL OVER STUDENT SERVICE FEES

Principle: As the main beneficiaries and primary funders of student services, students should inform these services and be given the opportunity to provide input and feedback.

Principle: Giving students access to information about expenditure of fees allows a greater degree of trust to develop between students and their post-secondary institutions.

Principle: Students should have the ability to participate in the high-level management of the services they pay for.

Concern: Post-secondary institutions have significant control over which student services are funded and to what degree.

Recommendation: All non-tuition ancillary fees should be overseen by bodies consisting of a majority of democratically elected or appointed student membership.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that students be given the opportunity to sit on the governing bodies of university services funded by ancillary fees.

Universities are complex financial organizations, often administering funds in the hundreds of millions of dollars annually. The source of these funds varies: government funding (basic operating grants) and tuition fund both the research and teaching missions of universities, whereas ancillary fees fund other operations. In most circumstances, OUSA stands behind the principle of students directly contributing to the financial costs of providing post-secondary education, though this contribution should be paired with significant government contributions to reflect that there are both public and private benefits to a more educated populous.

User-pay should result in payer-accountability and payer-representation. Universities in Ontario have a multi-stakeholder identity, as demonstrated by the varied compositions of their Boards of Governors and Senates.²⁸ Students contribute significantly to education through tuition, and so they should have significant representation on university senates. Similarly, students provide most or all of the funding for many services funded by ancillary fees, which should entitle them to at least some representation in the governing bodies that oversee the operation of those services. These governing bodies include advisory boards overseeing health services departments, student success offices, and other high-level bodies that oversee specific units of the university.

The nature of student representation can and should vary between different ancillary fees, but student service fees should be primarily governed by students. The Student Choice Initiative has dictated that there should be a fee protocol assented to by all student representative bodies. This recognition acknowledged that, even in a directive with negative impacts for student associations, student association oversight over fees remains critical.²⁹ Students should have majority representation and control over fee levels, in order to ensure that student deliberation will determine the high-level direction and provision of these services; this could include advising on new program development and reviewing current programs. Universities have a stake in these programs and expenditures as well, especially considering that they are generally responsible for operating these services. They should have every opportunity to inform discussion and present realistic options for service provision. But as the university's mission is to provide core services and education, additional services that will cost students money should require collective consent by the student body as to whether students wish to see the university provide them.

Fees that include baseline student services (as defined in this policy) should be considered student service fees, in the event that the provincial government does not provide adequate funding for them, so that students are at least able to set these fees at a satisfactory level. This will allow students to pass, by referenda, fees that cover off areas that should be directly funded by the government (but are not) — i.e. services that are necessary for students to have safe, healthy post-secondary experiences.

Students are the main funders and primary beneficiaries of student service fees, and for that reason, students should govern the services funded by these fees. Conversely, universities should be given significant control over setting incidental fees, as these help them differentiate themselves from other universities. Students should not have the authority to substantially reduce or cancel incidental fees unilaterally. However, students should have a seat at the table so that they can provide oversight and knowledge about expenditures funded by incidental fees, given that it is students who provide this funding. The appointment of true student representation via election or by a student-elected executive or body is critical to democratic accountability, and it helps ensure that those representing students are backed by the student populous.

²⁸ "Collegial governance at Ontario universities: Report of the OCUFA University Governance Committee, February 2019," Ontario Confederation of University Faculty Associations (OCUFA), 2019, retrieved from: <https://ocufa.on.ca/assets/2019-02-09-Governance-Report.pdf>

²⁹ "Tuition Fee Framework and Ancillary Fee Guidelines: Publicly-Assisted Universities," Ministry of Training, Colleges and Universities, 2019, retrieved from: <http://www.tcu.gov.on.ca/pepg/mtcu-university-tuition-framework-guidelines-mar2019-en.pdf>

INCIDENTAL FEES

HOUSING & RESIDENCE

Principle: Student housing is an important service provided to students, including new students transitioning into a new community.

Principle: Student housing should be provided at an affordable rate to encourage participation in a common community, especially during students' first year attending a post-secondary institution.

Concern: Housing prices can be set at fully autonomous rates by universities, which could be seen as a revenue-generating mechanism in financially difficult times.

Concern: Due to year-to-year turnover and generally inexperienced users of residence services, there may be reduced market pressure to increase the service quality of residences.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that all university residences or housing systems have an oversight body with student representation.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that the oversight body in the recommendation immediately above shall be responsible for compiling a periodic public report on the state of the housing system, including a breakdown of aggregate revenues, operating expenditures, and contributions to any housing capital fund.

Many students across Ontario live in university housing systems. In particular, these systems help integrate first-year students into their university communities as they navigate the substantial change of lifestyle between secondary and post-secondary education systems. Among OUSA member schools, most first-year students are guaranteed housing.

Housing plays a key role in helping students succeed in post-secondary education. In Canada, first-year residence experiences have been linked to better retention rates and academic performance.³⁰ Residences also play a key role in the student experience: living at or near their institutions can help students get involved in extra-curriculars, which increases their sense of belonging and often helps them build skills for after graduation.

Students should have significant and meaningful oversight over university residence systems (though majority oversight is not necessary). Universities offer residence as an optional fee-for-service and do not require students to participate in a residence system, which means students can choose whether or not to live in residence. However, students nevertheless make significant contributions to housing, through housing fees and non-optional meal plan fees. These fees may vary between residences within an institution. Generally, however, students at OUSA schools pay an average of \$12,000; this number refers to the cost of a traditional-style residence with double occupancy for an eight-month term, as well as the smallest obligatory meal plans is approximately 12,000 dollars.

³⁰ Academica Group. "Good News for the Champions of on-Campus Housing." Academica Forum. Academica Forum, January 17, 2017. <https://forum.academica.ca/forum/good-news-for-the-champions-of-on-campus-housing>.

First-Year Housing Guarantees at OUSA Member Institutions

Institution	Housing Guarantee
Waterloo ³¹	First-year housing guarantee — a spot for anyone who wants it
Laurier ³²	First-year housing guarantee — a spot for anyone who wants it
Brock ³³	First-year housing guarantee — a spot for anyone who wants it with an academic average over a designated amount
McMaster ³⁴	Qualified first-year housing guarantee — a spot for all students who want it with an average above a given amount
Western ³⁵	First-year housing guarantee — a spot for anyone who wants it
Laurentian ³⁶	First-year housing guarantee — a spot for anyone who wants it
Trent-Durham ³⁷	First-year housing guarantee — a spot for anyone who wants it, with some exceptions for January-start programs
Queens ³⁸	First-year housing guarantee — a spot for anyone who wants it

However, relative to other fees, there is a much larger capital investment component to university residence and housing systems, with commitments of large buildings that are difficult and costly to repurpose. As residences both serve a critical role and are highly capital and space intensive in nature, majority control of residences by students is not called for by OUSA.

Non-optional meal plans for traditional style housing are something that OUSA supports. Granted, there are benefits to compulsory meal plans: they provide a stable expected budget for the university to provide a meal plan infrastructure to all students, and they prevent students from attempting to reduce expenses by spending less on food and sacrificing their health and well-being in the process. However, compulsory meal plans are also unregulated, and they could be better managed if there was a generous but reasonable government cap on university meal plan rates.

³¹ “University of Waterloo.” Waterloo Residences, June 21, 2019. <https://uwaterloo.ca/housing/incoming-first-years>.

³² “Join Us at Laurier.” Wilfrid Laurier University. Accessed December 5, 2019. <https://www.wlu.ca/future-students/undergraduate/residence/index.html>.

³³ “Living at Brock.” Brock University. Accessed December 5, 2019. <https://discover.brocku.ca/living/>.

³⁴ “How to Apply for Residence.” Living At McMaster. Accessed December 5, 2019. <https://housing.mcmaster.ca/future-residents/how-to-apply/>.

³⁵ “Residence Fees and Payment.” Link to room cost. Accessed December 5, 2019. https://residence.uwo.ca/applying/fees_and_payment/index.html.

³⁶ “Residences.” Laurentian University. Accessed December 5, 2019. <https://laurentian.ca/accommodations>.

³⁷ “Durham Campus.” Durham Campus - Housing - Trent University. Accessed December 5, 2019. <https://www.trentu.ca/housing/durham-campus>.

³⁸ “First Year Undergraduate Student” Queen’s University – Residences. Accessed December 5, 2019.

<https://residences.housing.queensu.ca/coming-to-residence/how-to-apply/applications-by-student-type/first-year-undergraduate-student/>

Residence Cost Samples from OUSA Member Institutions

School	Residence Fee (2019, 8 month)	Compulsory Meal Plan (smallest)
Waterloo (Ron Eydt Village) ³⁹	\$5879	\$4904
Laurier (King Street Residence) ^{40,41}	\$7878	\$5450
Brock (DeCew Residence) ⁴²	\$6940	\$4500
Queens (double room) ⁴³		\$14772
McMaster (double room) ⁴⁴	\$6885	\$4355
Trent-Durham (Simcoe South Central Suites) ^{45,46}	\$6210	Not required (but required at other Trent-Durham residences)
Laurentian (single room) ⁴⁷	\$6807	3753
Western (Delaware Hall) ⁴⁸	\$7410	5800
Unweighted Average, OUSA Schools		\$11432

This significant amount of revenue per student deserves oversight. University housing is an unregulated market, and this poses long-term risks. These risks include (but are not limited to) financial pressures from reduced government funding, in which housing might be seen as an opportunity to generate revenue for universities. Fee-setting should remain with the administration due to the desire to maintain a quality housing system. In place of a majority student committee that determines housing fees, an oversight body with student representation may assist in keeping a student focus in the future development of residence and housing systems, as well as development and delivery of programs and quality assurance.

COURSE WITHDRAWAL FEES

Principle: Students should be free to switch courses during the entirety of a course-add period without financial penalty.

Concern: Some post-secondary institutions charge fees for withdrawing from classes.

Concern: Course withdrawal fees are unregulated.

Recommendation: The provincial government should, through standalone ancillary fee guidelines, ban course cancellation fees for changes in course configurations in the first four weeks of class.

Recommendation: The provincial government should, through standalone ancillary fee guidelines, ban course withdrawal fees when students have to withdraw due to medical or mental health reasons.

³⁹ “Waterloo Residences.” University of Waterloo. Accessed December 5, 2019. <https://uwaterloo.ca/housing/fees-contracts/residence>.

⁴⁰ “Residence Buildings.” Laurier. Accessed December 5, 2019. <https://students.wlu.ca/student-life/residence/buildings.html>.

⁴¹ “Meal Plans.” Laurier. Accessed December 5, 2019. <https://students.wlu.ca/student-life/dining-on-campus/meal-plans.html>.

⁴² “Residence fees.” Brock University. Accessed December 5, 2019. <https://brocku.ca/residence/apply/residence-fees/>.

⁴³ “Residence Fee Schedule: First Year Undergraduate, 2019-2020.” Queen’s University. Accessed December 5, 2019.

<https://residences.housing.queensu.ca/wp-content/uploads/2019/05/First-Year-Fee-Schedule-2019-20.pdf>

⁴⁴ “Residence Fees and Other Costs.” McMaster University. Accessed December 5, 2019. <https://housing.mcmaster.ca/future-residents/residence-fees/>

⁴⁵ “Residence Rates.” Trent-Durham. Accessed December 5, 2019. <https://trentdurhamresidence.ca/residence-rates/#Simcoe-Central-and-South-Academic>.

⁴⁶ “Meal Plans.” Trent-Durham. Accessed December 5, 2019. <https://trentdurhamresidence.ca/meal-plans/>

⁴⁷ “Residences and Meal Plans.” Laurentian University. Accessed December 5, 2019. <https://laurentian.ca/fees-financing/residences-meal-plans>.

⁴⁸ “Securing Your Spot in Residence.” University of Western Ontario. Accessed December 5, 2019. https://residence.uwo.ca/applying/fees_and_payment/index.html

Universities often charge course cancellation fees. For example, Laurentian has a \$344 fee for withdrawing from studies after September 4th;⁴⁹ Western students pay \$270.⁵⁰ Universities also charge per-course refund fees for partial withdrawal, set at \$72 per course for Western students.⁵¹ These fees are not necessary for universities to properly plan teaching resources. They are also unregulated, which allows universities to charge as much as they see fit — and perhaps more than is necessary to maintain operations.

Course withdrawal fees may be especially burdensome for international students, who already face higher fees, or for students experiencing medical or mental health issues. And in general, these fees impose additional financial penalties on students who may be making difficult decisions about withdrawal from courses or studies or about their future in general. Moreover, these fees are not necessary. Instead, universities could: increase proportions of tenured faculty who do not need to be hired on contract; only approve courses with a sufficient number of students enrolled; or simply accept the minor financial losses that a penalty-free system would entail.

For these reasons, the provincial government should ban course cancellation fees during the first four weeks of class or when students are forced to withdraw from courses for medical or mental health reasons.

ADMINISTRATIVE/MISCELLANEOUS FEES

Principle: Administrative fees are meant to cover the cost of routine administrative processes.

Concern: Administrative fees are often nominal but widespread, and therefore impractical to regulate on a fee-by-fee basis.

Concern: There is no provincial regulation preventing net-revenue-generating administrative fees.

Recommendation: The provincial government should establish, through standalone ancillary fee guidelines, that administrative fees must be charged at a commensurate or lower rate than the cost of providing the services funded by those fees.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that before the introduction of an administrative fee, a rudimentary assessment of the cost of providing that service be conducted, and that these assessment documents be made available to any student upon request.

Recommendation: The provincial government should establish, through standalone ancillary fee guidelines, that any fee not otherwise categorized by the standalone ancillary fee guidelines or categorized by a mutual agreement of a post-secondary institution and its student associations, shall be considered a miscellaneous fee and be treated identically to an administrative fee.

Recommendation: If a fee is classified as miscellaneous, the provincial government should mandate, through standalone ancillary fee guidelines, that this miscellaneous status remain until a stakeholder requests that the Ministry of Colleges and Universities determine the classification of the fee into another category.

Universities charge a widespread variety of administrative fees, including fees for transcripts, student card replacements, appeals, exams, and graduation. (These fees should be distinguished from administrative surcharges which are applied or “tacked on” to other fees.) Administrative fees are typically assessed on a

⁴⁹ “Rules and Regulations.” Laurentian University. Accessed December 5, 2019. <https://laurentian.ca/fees-financing/rules>.

⁵⁰ “Academic Calendar 2010.” University of Western Ontario. Accessed December 5, 2019. <http://www.westerncalendar.uwo.ca/Archive/2010/pg157.html>.

⁵¹ Ibid.

fee-for-service model and, usually, universities do not provide justification for why fees are set at the level they are.

There is no provincial regulation preventing universities from generating profit from administrative fees. Yet administrative fees exist to cover the cost of routine administrative processes, like issuing transcripts to students, and not to generate profit. The current model allows universities to decide administrative fee levels arbitrarily, rather than based on administrative costs. For that reason, the provincial government should mandate that administrative fees may only be charged at a rate commensurate or lower than the cost of providing the services funded by those fees. In other words, there should be a “break-even mandate” for administrative fees. To ensure that this requirement is met, the government should also require that, for all new administrative fees, universities conduct a rudimentary assessment of administrative costs for the service in question; this assessment should be made available to any student upon request.

Some fees are administrative in nature but not referred to as such in the *Tuition Fee Framework and Ancillary Fee Guidelines* or mutual agreements between post-secondary institutions and their student association(s). These fees should be deemed “miscellaneous fees,” which would allow them to be assessed at university-determined rates, under a “break-even mandate” (see above), until such time that an agreement can be reached by the university and student association(s), or until a determination is made by the Ministry of Colleges and Universities. Moreover, the provincial government should mandate that a fee shall maintain their miscellaneous” status until a post-secondary stakeholder requests that the Ministry place it into another category.

THIRD-PARTY FEES

Principle: Students are entitled to responsible oversight over how third-party fees are used.

Concern: In many cases, the provincial government has no mechanism to mandate student control of fees paid to third parties.

Concern: Many students feel uncomfortable with third parties receiving student money and perceive a lack of accountability for third party fees.

Recommendation: The provincial government should mandate that student associations be given the ability to determine the democratic processes they use to approve a third-party fee when they first enter into agreement with third-party organizations.

Recommendation: The provincial government should mandate that the processes referred to in the recommendation immediately above be voluntarily agreed to by the relevant student association and third-party organization every three years.

Recommendation: The provincial government should mandate that the processes referred to in the two recommendations immediately above take precedent over any other process(es) mandated by a third-party organization.

Ancillary fees are sometimes paid to third parties that provide services for students, or that students have decided to support. Often, third-party organizations are better-suited to provide certain services to students than their university or student association. For example, at many universities, students pay third-party fees to the Ontario Public Interest Research Group provincial network, which draws attention to and conducts research on social justice topics that universities and student associations lack the resources to study.⁵² Similarly, third-party fees may be paid to organizations that are not primarily concerned with university students, or whose scope extends beyond university students. For example,

⁵² “Welcome to the Provincial Network.” OPIRG Provincial Network. Accessed December 5, 2019. <https://www.opirg.org/>.

under the Queen's Alma Mater Society's optional fee slate, students are able to fund the Kingston Canadian Film Festival.⁵³

While third-party fees are often beneficial, many have been controversial among students. Public interest research groups have recently been defunded (e.g., at Brock) because they were not in students' best interests.⁵⁴ Examples like this show that, even when third-party organizations do have leadership positions reserved for students, their general elections may not be accessible to students (relative to the accessibility of elections for student associations). These elections often take place at general meetings which, compared to student association general elections, often have substantially less participation and make it more difficult for students to vote. The defunding of these particular fees shows the high standards for which students expect their money to be used.

For some third-party fees, students are not directly represented within the organization's management. For example, Queen's students pay an optional fee to Dawn House Women's Shelter but do not have oversight over how the organization is run.⁵⁵ While this organization does good work, students are nevertheless being asked to trust that the organization will use their fees wisely. The funding model used by the Queen's Alma Mater Society (AMS) is an excellent example of student association discretion in determining mandatory status — one which predates the Student Choice Initiative. This model has given students more control over which fees they pay; they elect representatives to the AMS' assembly, who, in turn, determine which fee proposals go to referendum.⁵⁶

Additionally, it is often difficult to remove a third-party fee under the current model. Often, this is done through referenda, which require significant organization, time, and effort to ensure that voters are well informed. Moreover, these referenda usually remove the fee completely, rather than reducing it. A middle ground for fiscal responsibility could be to entrust the mandatory or non-mandatory determinations of third-party fees to student associations with higher democratic participation rates. This measure would allow student associations to represent what fees students want to pay; it would also allow them to conduct inquiries into third-party service provision using student association staff.

The provincial government should mandate that student associations be given the ability to determine the democratic processes they will use to decide if they approve any third-party fee when they first enter into agreement with third-party organizations. Student associations should be allowed to conduct this review once every three years. Under this model, student associations would still be able to impose restrictions requiring referenda to determine the mandatory status of third-party fees (as the Queen's AMS had already done before the Student Choice Initiative).⁵⁷

Another area of concern is that a third-party organization can obtain membership in another third-party organization (e.g. one company acquiring another), which would make them subject to a new set of bylaws, operating conditions, and obligations. This can have negative implications for student association autonomy; if the nature of the third-party changes, its new obligations may negatively affect student associations and the students who pay the third-party fee. In other words, students and student associations may agree to pay a fee to a third-party because they approve of its current structure, only to find that the third-party undergoes significant changes when acquired by another organization.

Third-party fees are also paid out to student association alliances and federations, including the Ontario Undergraduate Student Alliance (OUSA), the Canadian Alliance of Student Associations (CASA), and the Canadian Federation of Students (CFS) and its provincial chapter, CFS Ontario. These non-profit organizations seek to consolidate and focus the political power of students to push for policy outcomes on

⁵³ "Student Fee Slate." Queen's Alma Mater Society. Accessed December 5, 2019. http://myams.org/wp-content/uploads/2018/08/SAF-Slate11819_FINAL.pdf

⁵⁴ "Referendum Archive." Brock University Students' Union. Accessed December 5, 2019. <https://www.brockbusu.ca/government/documents/referendum-archive/>

⁵⁵ Queen's Journal. "The Queen's Journal, Volume 141, Issue 15." Issuu. Accessed December 4, 2019. https://issuu.com/queensjournal/docs/issue_15_master/15.

⁵⁶ "Student Activity Fee Policy." Queen's Alma Mater Society. Accessed December 5, 2019. <http://myams.org/wp-content/uploads/2018/04/StudentActivityFeePolicy-20180424.pdf>

⁵⁷ Ibid.

the provincial and federal levels. They have been responsible for a great number of policy outcomes in and beyond Ontario, often providing good value to students. Through their student associations, students pay fees to fund the operational costs of these organizations; under the Student Choice Initiative, however, these fees have become optional. Unfortunately, students may be encouraged to opt out of these fees, knowing that, even if they choose not to pay, they will continue to benefit from the advocacy these organizations conduct. These organizations typically advocate on behalf of all students, and not just the students who choose to fund their operations.

Finally, student societies — groups representing smaller faculty, departmental, satellite campus student groups, etc. — can exist parallel to student associations. These societies are a valuable part of the student experience. For example, there are faculty and academic societies at McMaster University which often have no direct governance relationship with the McMaster Students Union. In many cases, they have a tradition of non-mandatory fees that precedes the Student Choice Initiative. These fees should not be considered third-party fees under this section. Instead, they should be viewed as “student service fees,” as defined in this paper; as such, they should not be subject to the mandatory renewal processes recommended in this section.

ADDITIONAL RESOURCES FOR LEARNING

TEXTBOOKS, COURSEWARE & DIGITAL LEARNING MATERIALS

Principle: All of the costs borne by students for academic evaluation and instruction should be paid for through tuition fees only.

Principle: Learning materials should equip students to achieve the highest quality of education possible.

Concern: Students are being asked to purchase digital evaluation packages in compulsory courses, either as part of a textbook bundle or as a standalone product, and this places a significant financial burden on students.

Concern: High and inconsistently regulated prices for textbooks, courseware, and publications in compulsory courses place a significant financial burden on students.

Concern: Courseware for compulsory courses often changes on an annual basis, causing high-cost courseware to lose resale value for students.

Concern: The exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines* for digital learning materials that are property of the student, which can include test/assessment tools, allows post-secondary institutions to require digital online evaluation packages in compulsory courses.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that post-secondary institutions establish a formal and accessible complaint system or mechanism for students who are being charged fees they suspect contravene institutional policy.

Recommendation: The provincial government should review the use of digital learning materials and evaluation tools and create best practices for future use of these tools, with respect to accessibility and quality of education.

Recommendation: The provincial government should invest in open educational resources (OERs) and other online materials for instructors and incentivize postsecondary institutions to do the same.

Recommendation: The provincial government should incentivize instructors to use open educational resources (OERs).

Recommendation: To minimize instructor conflict of interest, the provincial government should task the Higher Education Quality Council of Ontario (HEQCO) with reviewing the accessibility, affordability, and quality of instructional materials developed by instructors.

When undergraduate students from OUSA's eight member schools were surveyed both in 2015 and 2017, affordability was their primary concern.⁵⁸ The cost of courseware and learning materials can add a large financial burden on students who are already financially strained. According to OUSA's Ontario Post-Secondary Student Survey, Ontario students spent an average of \$559 on textbooks in 2017.⁵⁹ The hefty cost of these teaching materials also weighs on the Ontario government, as it places increasing demands for financial aid to students.

⁵⁸ "Affordability: Results from the 2017 Ontario Post-Secondary Student Survey." Ontario Undergraduate Student Alliance (OUSA). Accessed December 5, 2019. https://d3n8a8pro7vnm.cloudfront.net/ousa/pages/1871/attachments/original/1566236646/FINAL_OPSSS_Affordability_Report_2017document.pdf?156623664;

"Affordability: Results from the 2015 Ontario Post-Secondary Student Survey." Ontario Undergraduate Student Alliance (OUSA). Accessed December 5, 2019. https://d3n8a8pro7vnm.cloudfront.net/ousa/pages/390/attachments/original/1486564093/Affordability_OPSSS2015_document.pdf?1486564093.

⁵⁹ Ibid.

With these numbers, it is unsurprising that almost half of students (49%) reported they had not bought all their required textbooks.⁶⁰ Deciding to not purchase course material to avoid financial strain can impact students' academic success, which can affect their career prospects. A 2017 study by Jhangiani and Jhangiani surveyed 320 post-secondary students in British Columbia and found that thirty percent of respondents felt they had earned a poorer grade after not purchasing a textbook because of the cost involved.⁶¹

The market of post-secondary learning materials is remarkably different from common commerce. The individual who chooses the items to purchase (faculty) is not the same as the individual paying for said items (students), and thus demand is less responsive to price increases (relative to the purchase of items like a pair of jeans).⁶² This separation of choice and purchase has led to similar exponential inflation rates in markets like pharmaceuticals.⁶³ These financial burdens weigh heavier on students who already face barriers to education, including students with disabilities, first generation students, students with low family income, and members of a visible minority.⁶⁴

Despite the importance that affordability plays in students' lives, there is little financial transparency regarding course materials costs prior to registration. Rather than costs being included within the tuition framework, many students are unaware of the cost of their financial materials until after they register for a class or program. In the B.C. study mentioned above, seventeen percent of students said they had dropped or withdrawn from a course due to the cost of textbooks and education material.⁶⁵ Students deserve to know the full cost of a program when they pay tuition, and not after the fact.

Similarly, non-optional teaching and testing material is a widespread practice across Ontario. When OUSA surveyed students in 2017, forty-nine percent were required to pay fees or purchase additional software to complete non-optional tests, assignments, or examinations.⁶⁶ These costs were necessary for academic evaluation and instruction, yet not transparent until a student had already registered for a course. Upfront disclosure and transparency of course and program costs, including non-optional materials, should be mandatory.

Textbook prices are high and inconsistent, which results in substantial economic stress on students. There is a general lack of Canadian data on the topic of textbook costs, but a study from the U.S Bureau of Labor Statistics indicates that post-secondary textbook costs have increased by 1,041% since 1977. This inflation rate vastly outpaces the 235% general inflation rate. Non-optional course testing material often takes the form of textbooks bundled with access codes that expire at the end of the semester or year.⁶⁷ Choosing such textbook packages not only makes the purchase of them necessary for equal academic success; it

⁶⁰ "Affordability: Results from the 2017 Ontario Post-Secondary Student Survey." Ontario Undergraduate Student Alliance (OUSA). Accessed December 5, 2019.
https://d3n8a8pro7vhm.cloudfront.net/ousa/pages/1871/attachments/original/1566236646/FINAL_OPSSS_Affordability_Report_2017document.pdf?156623664

⁶¹ Jhangiani, Rajiv, and Surita Jhangiani, "Investigating the Perceptions, Use, and Impact of Open Textbooks: A survey of Post-Secondary Students in British Columbia," *International Review of Research in Open and Distributed Learning* 18, no. 4, (2017), 172-192. ISSN: EISSN-1492-3831.

⁶² Koch, James, "An Economic Analysis of Textbook Pricing and Textbook Markets," *ACSFA College Textbook Cost Study Plan Proposal*, Washington, DC: Advisor Committee on Student Financial Assistance, (2006).

⁶³ Ibid.

⁶⁴ "Affordability: Results from the 2017 Ontario Post-Secondary Student Survey." Ontario Undergraduate Student Alliance (OUSA). Accessed December 5, 2019.
https://d3n8a8pro7vhm.cloudfront.net/ousa/pages/1871/attachments/original/1566236646/FINAL_OPSSS_Affordability_Report_2017document.pdf?1566236646OUSA OPSS 2015 & 2017

⁶⁵ Jhangiani, Rajiv, and Surita Jhangiani, "Investigating the Perceptions, Use, and Impact of Open Textbooks: A survey of Post-Secondary Students in British Columbia," *International Review of Research in Open and Distributed Learning* 18, no. 4, (2017), 172-192. ISSN: EISSN-1492-3831.

⁶⁶ "Affordability: Results from the 2017 Ontario Post-Secondary Student Survey." Ontario Undergraduate Student Alliance (OUSA). Accessed December 5, 2019.

https://d3n8a8pro7vhm.cloudfront.net/ousa/pages/1871/attachments/original/1566236646/FINAL_OPSSS_Affordability_Report_2017document.pdf?1566236646OUSA OPSS 2015 & 2017

⁶⁶ Kristof, Kristof, "What's behind the Soaring Cost of College Textbooks," CBS News (CBS News, January 26, 2018), <https://www.cbsnews.com/news/whats-behind-the-soaring-cost-of-college-textbooks/>

⁶⁶ Ibid.

⁶⁷ Ibid.

renders the textbooks worthless in a resale market due to the temporary nature of the codes.⁶⁸ As a result, students are required to purchase expensive, non-optional course materials, at retail prices at the campus bookstore. Numerous additional factors, including publishers releasing new editions and faculty turnover, lead to course materials changing often.⁶⁹ This turnover makes it difficult for students to recuperate some of their money by selling used books, and it makes it difficult for students to find cheaper alternatives for their required course materials.

The decision to exempt digital learning material that is the property of the student from the *Tuition Fee Framework and Ancillary Fee Guidelines* places a financial burden on students — one that they may be unaware of cost prior to choosing a course. Some students may be unable to avoid these courses if they are required for their program. Given the significant costs of these materials and evaluation tools, the provincial government should conduct a review of their use throughout the province. The knowledge gathered from this review should guide best practices for future use, with respect to accessibility and quality of education.

The provincial government should also invest in open educational resources (OERs) and other online materials as an option for instructors and, accordingly, incentivize postsecondary institutions to do the same. Open education is “teaching, learning, and research resources that, through permissions granted by their creator, allow others to use, distribute, keep, or make changes to them.”⁷⁰ British Columbia introduced an Open Textbook collection of 244 textbooks and 20 guides and toolkits; and, as of 2018, this program has saved students an estimated \$8.8 million to \$9.2 million dollars.⁷¹ Forty post-secondary institutions across BC adopted open textbooks and over 90 thousand students use open textbooks⁷². Research on the B.C Open Textbook project also finds that while cost to students decreases, quality does not suffer. The 2017 Jhangiani and Jhangiani study, mentioned above, found that “sixty-three percent of respondents judged the overall quality of their open textbook to be above average.”⁷³ The study also found that students appreciated the accessibility open textbooks offered, both in immediate portable physical access and the financial accessibility through cost-saving. This study and other research suggest that open textbooks improve the accessibility of university and decrease student ancillary fees without sacrificing quality of education.

The provincial government should also work with institutions to incentivize teaching staff and researchers to utilize OERs. With incentives helping equalize the benefits of OERs as a publication option in comparison to the traditional route, students will have a greater set of options that are both financially and physically accessible.

Additionally, the provincial government should mandate that institutions establish a formal and accessible complaint system or mechanism for students who are being charged fees they suspect contravene institutional policy. Providing this avenue will give students a voice in their purchases, which has not been previously provided, and will ensure increased transparency. Finally, to minimize instructor conflict of interest when they assign course materials, the provincial government should task HEQCO with reviewing the accessibility, affordability, and quality of instructional materials developed by instructors. Universities may set internal restrictions on instructors’ abilities to assign their own instructional material or to earn royalties when assigning them. However, this is currently a voluntary decision made by select universities, and by relatively few Ontario universities. There is little publicly available data on this issue; however, research in the United States suggests that many faculty members are able to make a small profit when assigning material they created.⁷⁴ While this practice is not

⁶⁸ Kristof, Kristof, “What’s behind the Soaring Cost of College Textbooks,” CBS News (CBS News, January 26, 2018), <https://www.cbsnews.com/news/whats-behind-the-soaring-cost-of-college-textbooks/>

⁶⁹ Koch, James, “An Economic Analysis of Textbook Pricing and Textbook Markets,” *ACSFA College Textbook Cost Study Plan Proposal*, Washington, DC: Advisor Committee on Student Financial Assistance, (2006).

⁷⁰ “Open Textbook Project.” BC Campus. Accessed November 15, 2019. <https://bccampus.ca/open-textbook-project/>

⁷¹ Ibid.

⁷² Ibid.

⁷³ Jhangiani, Rajiv, and Surita Jhangiani, “Investigating the Perceptions, Use, and Impact of Open Textbooks: A survey of Post-Secondary Students in British Columbia,” *International Review of Research in Open and Distributed Learning* 18, no. 4, (2017), 172-192. ISSN: EISSN-1492-3831.

⁷⁴ Koch, James, “An Economic Analysis of Textbook Pricing and Textbook Markets,” *ACSFA College Textbook Cost Study Plan Proposal*, Washington, DC: Advisor Committee on Student Financial Assistance, (2006).

inherently undesirable (and for specialized courses instructor created material may be a necessity), the government should commit to proper oversight of this practice to guarantee that it is not abused. Implementing these changes will make textbooks and courseware more affordable, accessible, and transparent for students across Ontario.

WORK-INTEGRATED LEARNING

Principle: All willing and qualified students should be able to benefit from work-integrated learning opportunities during their post-secondary education.

Principle: Students should not be unduly charged for pursuing work-integrated learning within a particular program or post-secondary institution.

Concern: The exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines* for work placement fees allows post-secondary institutions to charge high amounts for placement services, creating an inequity among students wishing to partake in work-integrated learning.

Recommendation: The provincial government should invest in work-integrated learning programs on campuses to reduce these programs' dependency on student ancillary fees.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that students in work-integrated learning programs be given a detailed explanation of how work-integrated learning fees are used.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that fees for work placements be commensurate or lower than the cost of providing those work placements to students.

Recommendation: The provincial government should establish a tuition-independent cap for work-integrated learning fees across the province.

Work-integrated learning includes placements, rotations, and co-op work terms that are part of the educational experience, and as such, it is reasonable for students to pay a fee for the value that work-integrated learning adds to their educational experience. Most schools with programs like this levy fees connected to work-integrated learning. For example, the University of Waterloo co-op fee funds the Waterloo co-op program. Currently, students pay \$729 per term, which means this fee is charged to co-op students five-to-eight times throughout their undergraduate degree. These students, therefore, can end up paying \$3500-5900 more in tuition than non-co-op Waterloo students.⁷⁵

Provincially, work-integrated fees are unregulated; and under the Student Choice Initiative, they are deemed “essential” and are not subject to ancillary fee protocols created by student associations and universities. This constitutes a gap in fee regulation. While the binding policy directive does restrict the expenditure of these funds on related experiences, there is nothing in place to cap how these fees may increase.⁷⁶ To respond to this, the provincial government should establish a rising cap (or caps-by-program) on work-integrated learning fees across the province that would dictate the maximum amount a university could charge students for access to a work-integrated learning program; this cap should contain a mechanism for exceptions in exceptional circumstances, to be granted by the Ministry of Colleges and Universities. The provincial government should also mandate that students in work-integrated learning programs be given a detailed explanation of how work-integrated learning fees are used.

⁷⁵ “Co-op Fee FAQs.” University of Waterloo. Accessed December 5, 2019. <https://uwaterloo.ca/co-operative-education/your-co-op-fee/co-op-fee-faqs>.

⁷⁶ “Tuition Fee Framework and Ancillary Fee Guidelines: Publicly-Assisted Universities,” Ministry of Training, Colleges and Universities, 2019, retrieved from: <http://www.tcu.gov.on.ca/pepg/mtcu-university-tuition-framework-guidelines-mar2019-en.pdf>

The provincial government should also mandate that work-integrated learning fees be commensurate or lower than the costs of providing those services to students. In other words, work-integrated learning fees should be assessed on a “no more than cost-recovery” basis, and they should not generate a surplus to be used outside of the university’s work-integrated learning programming. Similarly, the provincial government should establish a tuition-independent cap for work-integrated learning fees across the province. This cap would not encompass separate courses or modules run by experiential education departments that are not requirements of the work-integrated learning program (which could be funded by a separate fee, and not on a cost-recovery basis).

PHYSICAL LEARNING MATERIALS

Principle: Students should not be required to incur costs for learning materials and clothing necessary for academic evaluation in compulsory courses outside of tuition fees.

Concern: Students are required to purchase learning materials and clothing for compulsory courses, which places significant financial pressure on students.

Recommendation: The provincial government should mandate that institutions provide an alternative subsidized rental or used option when compulsory courses require students to purchase learning materials and/or clothing.

Recommendation: The provincial government should invest in a program that provides envelope funding for institutions to offer affordable rental physical learning materials to students.

Students are routinely burdened with extra costs for physical learning materials. Often, they are required to purchase clothing and other materials for compulsory courses, adding to the high costs of tuition and textbooks. In many cases, these materials are required for educational purposes, and so students cannot simply choose not to purchase them (if they want to succeed academically). Recognizing this, the provincial government should mandate that institutions provide an alternative subsidized rental or used option when compulsory courses require students to purchase learning materials or clothing. This would increase equity among students by making it easier for low-income students to afford the materials they need to fully participate in their post-secondary education. To this end, the provincial government should also invest in a program that provides funding to help post-secondary institutions offer affordable rental materials to students.

FIELD TRIPS

Principle: Students require access to compulsory courses and should not encounter financial barriers through non-optional course fees when attempting to access said courses.

Principle: Cost should not be a barrier for students in their ability to access field trips that are part of their compulsory courses.

Concern: Non-optional field trip fees for compulsory courses place significant financial pressure on students, creating an inequity in students’ ability to access compulsory courses.

Recommendation: The provincial government should provide envelope funding to post-secondary institutions, which, in the form of bursaries, covers field trip costs in compulsory courses for students with demonstrated financial need.

Recommendation: The provincial government should mandate that institutions provide students with alternatives to field trips so that they can complete their compulsory course without academic penalty.

Field trip fees are listed as an exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines*.⁷⁷ As stipulated, field trip fees may cover the reasonable, direct costs of travel and accommodation for students on compulsory field trips. However, high-cost field trip fees for compulsory courses can create a financial barrier for students. Students recognize that field trips are a valuable learning tool that add to the quality of education, and do not wish to see a decrease in non-optional field trips for compulsory courses. However, students also recognize that non-optional field trips fees in compulsory courses are fundamentally related to the confirmation of credential completion, and are thus compulsory tuition-related ancillary fees, which the provincial government recognizes as illegal.⁷⁸ Therefore, non-optional field trip fees for compulsory courses should not be charged to students and should, instead, be included in tuition fees.

Under the current field trip fee exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines*, institutions are prohibited from charging compulsory ancillary fees for any component of an out-of-province compulsory field trip in a compulsory course.⁷⁹ Students believe that stricter guidelines should be put into place, mandating that institutions cannot charge compulsory ancillary fees for any component of any compulsory field trip in a compulsory course, regardless of location. Students also believe that needs-based bursaries for field trips at institutions would improve accessibility to field trips in compulsory courses. As such, the provincial government should provide envelope funding to post-secondary institutions, which, in the form of bursaries, covers field trip costs in compulsory courses for students with demonstrated financial need. Similarly, the government should mandate that institutions provide students with alternatives to field trips so that they can complete their compulsory course without academic penalty.

⁷⁷ "Tuition Fee Framework and Ancillary Fee Guidelines: Publicly-Assisted Universities," Ministry of Training, Colleges and Universities, 2019, retrieved from: <http://www.tcu.gov.on.ca/pepg/mtcu-university-tuition-framework-guidelines-mar2019-en.pdf>.

⁷⁸ Ibid.

⁷⁹ Ibid.

TRANSPARENCY & ACCOUNTABILITY

TRANSPARENCY

Principle: The administration, origin, and definition of any and all ancillary fees should be fully transparent to the entire student population.

Concern: The purposes or origins of ancillary fees are often poorly communicated to students, limiting transparency and institutional accountability.

Concern: The provincial term “compulsory non-tuition-related ancillary fee” is not used consistently at every Ontario post-secondary institution, which leads to inefficiency and a lack of transparency.

Concern: It is often unclear whether fees are being charged on a per-term, per-course/credit, or flat-fee basis.

Concern: The payment of ancillary fees is sometimes done in an inconsistent manner through many different offices and payment forms, contributing to a lack of transparency and accountability.

Recommendation: The provincial government should establish standalone ancillary fee guidelines, distinct from the tuition fee framework, in consultation with post-secondary institution administrators, student association representatives, and the Council of Ontario Universities (COU).

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that all fiscal material, including budgets, audits, and explanatory breakdowns of ancillary fees, be publicly disclosed in a way that is readily available to students.

Recommendation: The provincial government should mandate that the term “compulsory non-tuition-related ancillary fee” be used consistently across the sector.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that all post-secondary institutions levy and collect all ancillary fees through a centralized online system.

Funding for various services, buildings, and other capital projects at post-secondary institutions is sometimes generated from student dollars. For that reason, institutions should be transparent about how student funds are used, as well as the processes through which these funds are transported. Unfortunately, the purposes or origins of ancillary fees are often poorly communicated to students, limiting transparency and institutional accountability. Many students are also unaware of what terminology equates to which specific service, leading to further confusion while voting and setting these fees.

Institutions across the province are not required by the existing ancillary fee guidelines to utilize the same terminology for fees, which leads to inefficiency and a lack of clarity and transparency.⁸⁰ In many financial and fee statements, it is not clear whether fees are assessed on a per-term, per-course, per-credit, or a flat-fee basis, as this information is not consistently stated across all institutions. The provincial government should mandate that the term “compulsory non-tuition-related ancillary fee,” and other fee-related terms, be used consistently across the sector.

Properly-defined fee presentations on an on-going basis, with particular emphasis on the passage and pathway that ancillary fees take, should be a component of ancillary fees under a transparency clause. Students should have the ability to democratically decide and vote on their fees, and this information

⁸⁰ “Tuition Fee Framework and Ancillary Fee Guidelines: Publicly-Assisted Universities,” Ministry of Training, Colleges and Universities, 2019, retrieved from: <http://www.tcu.gov.on.ca/pepg/mtcu-university-tuition-framework-guidelines-mar2019-en.pdf>.

should be easily accessible to them, especially at times when they are voting on said fees and projects. When fees are up for debate, referendum, or review, updated financial information should be continually made available to students, in a public forum, in order to encourage transparency and accountability.

Through a standalone ancillary fee protocol, institutions can have a framework through which they successfully disclose all fiscal materials, budgets, audits, and explanatory breakdowns that are readily available to all students. Another contribution towards the lack of transparency and accountability is inconsistent practices surrounding the collection of ancillary fees. Often within institutions, a decentralized collection system and payment method of fees makes it difficult to track how much students are paying in ancillary fees, and what the fees are being levied for. The creation and regulation of a single, centralized method of collecting fees through the use of a secure online portal would eliminate these concerns.

ENDOWMENT FUNDS

Principle: Student-sponsored endowment funds should, except in extraordinary circumstances, be used only for non-tuition-related projects that improve student life.

Principle: Students should have control over the use of student-sponsored endowment funds.

Concern: Student-sponsored endowment funds are sometimes used to cover expenses that ought to be covered by tuition.

Concern: The administration of student-sponsored endowment funds is often opaque, and information is often not readily available to contributors.

Concern: Most student-sponsored endowment funds are funded by automatically assessed fees, which many students do not know are refundable.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that student-sponsored endowment funds be considered non-essential fees and thus subject to the same approval mechanisms stipulated in the standalone ancillary fee guidelines.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that independent, student-sponsored endowment funds be required to publish their financial information and a list of sponsored projects in a way that is readily available to students who contribute to the fund.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that disbursement of student-sponsored endowment funds be primarily controlled by students.

Endowment funds are investment funds that universities typically acquire through external donors. However, there are also student-sponsored endowment funds which contribute to various projects at Ontario's post-secondary institutions. For example, the Waterloo Environment Students Endowment Fund (WESEF) raises money to improve the quality of student life for students in their Faculty of Environment.⁸¹ These funds are typically administered by institutions, not students. Student-sponsored endowment funds are intended to enhance student life outside the academic realm. As such, these funds should only be used for non-tuition-related projects that improve student life (except in extraordinary

⁸¹ "Waterloo Environment Students Endowment Fund." University of Waterloo. Accessed December 4, 2019. <https://uwaterloo.ca/waterloo-environment-students-endowment-fund/>.

circumstances). However, these funds are sometimes used to cover expenses that ought to be covered by tuition.

Often, students sponsor endowment funds through automatically assessed fees. Institutions should make it clear to students that these sponsorship fees are refundable. These fees should submit to the same process as non-essential ancillary fees, giving students the opportunity to choose whether or not they want to contribute. Unfortunately, the administration of student-sponsored endowment funds is often opaque, and information is often not readily available to contributors.

The provincial government should ensure that independent, student-sponsored endowment funds publish their financial information and a list of sponsored projects in a way that is readily available to students who contribute to the fund. Moreover, students should maintain sufficient control over the endowment funds that they sponsor. Accordingly, the provincial government should take measures that give students primary control over the management and disbursement of student-sponsored endowment fees.

INSTITUTIONAL ANCILLARY FEE PROTOCOLS

Principle: There must always be a clear protocol for the establishment or increase of ancillary fees, and this protocol must be easily accessible to all members of a post-secondary community.

Principle: Ancillary fees should be regularly reviewed to ensure they remain relevant and necessary.

Concern: Ancillary fee protocol structures and review practices are not always transparent and accountable.

Recommendation: The provincial government should mandate, through standalone ancillary fee guidelines, that all post-secondary institutions be required to maintain an institutional ancillary fee protocol or protocols, agreed to by both the institution and the institution's student association(s), which would include terms of categorization, approval, and review of various fees, subject to provincial guidelines.

Recommendation: The provincial government should develop an institutional ancillary fee protocol structure that can be provided as a best practice example for post-secondary institutions. This structure should establish high-level roles and procedures for fee recommendations, approvals, collection and remittance.

Recommendation: The provincial government should introduce, through standalone ancillary fee guidelines, restrictions that ban universities from deducting (from the fees collected) administrative expenses for the collection or remittance of those fees.

While provincial standalone ancillary fee guidelines would establish baselines for many types of ancillary fees, the operationalization of these protocols would require adaptation for each post-secondary institution. This adaptation and application is not only to be expected, but should be required. Documents accessible on university websites explaining which fee oversight bodies exist at that specific institution, as well as any specific additional procedures, will be important to contextualizing the provincial standalone ancillary fee guidelines for each institution.

To aid in the creation of institutional ancillary fee protocols, the Ministry of Colleges and Universities should create a draft protocol template that may be adhered to by institutions and student associations if they so choose. Such a document would be beneficial for the purposes of standardization. Currently, ancillary fee protocol structures and review practices are not always transparent and accountable.

Finally, fee protocols should also include specific procedures regarding fee remittances to various organizations, including vendors, third parties, and student associations, such that reasonable dates are agreed to and administrative surcharges can be avoided.

SYSTEM-WIDE & VENDOR FEES

Principle: New ancillary fees should not be implemented without prior consultation with student associations.

Principle: Ancillary fees, regardless of the way they are negotiated, or the number of post-secondary institutions involved, should follow consistent guidelines without exemption.

Concern: System-wide and vendor fees are exempt from the current requirements under the Ancillary Fee Guidelines and are often implemented without student approval or consultation.

Concern: System-wide and vendor fees represent a method for post-secondary institutions to unfairly circumvent student approval of compulsory ancillary fees.

Recommendation: The provincial government should eliminate both the system-wide and vendor fee exemptions from the *Tuition Fee Framework and Ancillary Fee Guidelines*.

The Ontario Operating Funds Distribution Manual (2009) defines system-wide fees as “those where, through a formal agreement, the students affected at all Ontario universities pay a comparable fee for a comparable service.”⁸² This manual also outlines the exemption for “fees for materials or services where the institution acts as a broker with a vendor for the student,” explaining it as “fees paid by students to the university which do not produce net revenue for the institution but instead are set and levied through an agreement with a vendor.”⁸³

Vendor fees are distinguished from system-wide fees in a few regards. First, the term refers to fees for materials or services where the institution acts as broker and hence creates an agreement with a vendor who supplies the material or services provided. Secondly, the fees do not produce any net revenue for the institution itself which system-wide fees could allow. The exemption for vendor fees was created at a time where post-secondary institutions administered health and dental insurance plans.⁸⁴ However, as student associations became responsible for that task, vendor fees became virtually obsolete. Today, not a single health or dental plan in Ontario is negotiated by a university, highlighting the impractical nature of the vendor exemption.⁸⁵

These fees, while different, have a key similarity: a lack of requirement for student consultation and approval to levy additional costs. When describing system wide fees the Ontario Operating Funds Distribution Manual (2009) does outline that “in the case of provincial based system-wide fees established in the future, the Ministry hopes that students can be involved in the determination of these fees” suggesting an intention and hope for student consultation.⁸⁶ Nevertheless, this statement itself accepts the fact that it is a hope and desire, and not a requirement. Therefore, these fees could easily be created or raised without student consultation. Vendor fees, while similar in structure to fees where student associations play the role of “broker,” do not require any student consultation. This commonality leads to a similar risk of potential for abuse.

As Canadian universities face the threat of funding cuts and declining enrollment, the system-wide fees exemption could be abused to resolve funding deficits.⁸⁷ Furthermore, should universities once again begin to fulfill the role of administering student services, the current system presents ambiguity that leaves potential for abuse. OUSA described this potential problem in *Educated Solutions*, Vol. 12,

⁸² Ministry of Training, Colleges and Universities. “The Ontario Operating Funds Distribution Manual,” (Toronto: Government of Ontario, 2009).

⁸³ Ibid.

⁸⁴ “Educated Solutions, Volume 12: Tuition and Funding,” Ontario Undergraduate Student Alliance (OUSA), 2018, p. 11.

⁸⁵ Ibid.

⁸⁶ Ministry of Training, Colleges and Universities “The Operating Funds Distribution Manual.”

⁸⁷ Bradshaw, James, “Canadian Universities Feel the Squeeze of Spending Cuts,” *The Globe and Mail*, May 11, 2018, <https://www.theglobeandmail.com/news/national/education/canadian-universities-feel-the-squeeze-of-spending-cuts/article9582355/>

outlining that “by serving as the broker between a private service provider and the students, post-secondary institutions could theoretically levy a new ancillary fee and reduce their operating overhead, all without student insight or consent into the total cost.”⁸⁸ In a world where student associations may no longer be able to sustain student services due to the financial losses of voluntary funding (through the Student Choice Initiative), this hypothetical scenario could become reality. These exemptions could, therefore, create fees that circumvent the Student Choice Initiative and leave students with costs they did not approve and cannot opt-out of.

The problematic nature of the ambiguous regulation of system-wide and vendor fees is evident in the case of copyright fees at Western University in 2011. Acting as a supposed vendor, the university negotiated an independent arrangement with access copyright at a rate of \$27.50 per student, an increase of \$24.12 (over 7x) from the original \$3.38 fee. This fee was negotiated without student control or consultation and outside the system-wide basis, allowing it to evade oversight. While students do benefit from copyright protection for their academic research and studies, such protection is also essential for research conducted by the university, teaching purposes, administration, and more. Thus, despite being a service used by the community as a whole, students were footing the entire bill.

This example illustrates one of the essential flaws in the vendor fee structure and exemption: a misappropriation of the principle of the vendor-buyer relationship. In a vendor-buyer relationship in the marketplace, the buyer is aware and has agreed to purchase the goods sold by the vendor. This control allows the buyer to assess quality and shop competitively. In the instance at Western University and with ancillary vendor fees as currently structured, the buyer is effectively removed from the process. The problematic nature of system-wide and vendor fees and their removal of student voices acts against the very principles of “transparency and freedom of choice regarding the campus services and organizations which get access to their money” that the Student Choice Initiative was implemented to create.⁸⁹

The provincial government should eliminate both the system-wide and vendor fee exemptions from the *Tuition Fee Framework and Ancillary Fee Guidelines*, and these exemptions should not be included in the development of new, standalone ancillary fee guidelines. Getting rid of these exceptions or restructuring them to insist upon student consultation and approval, would protect students’ financial interests and the quality of services provided. This would also align with the principles of the Student Choice Initiative, in allowing students transparency and freedom of choice in where their dollars go.

FAIR COST SHARING

OPERATIONAL FUNDING

Principle: All willing and qualified students should be able to access and excel in Ontario's post-secondary education system.

Principle: Students should not have to disproportionately cover the costs of operational funding or funding of ancillary services for universities.

Principle: All groups accessing services funded through ancillary fees should contribute comparable amounts to those services.

Concern: Compulsory ancillary fees have been used as a source of increased operating revenue by universities in Ontario, and fee amounts have increased substantially above inflation over the past two decades.

⁸⁸ “Educated Solutions, Volume 12: Tuition and Funding,” Ontario Undergraduate Student Alliance (OUSA), 2018, p. 11.

⁸⁹ “Government for the People to Lower Student Tuition Burden by 10 per Cent,” Government of Ontario (Ministry of Colleges and Universities, January 17, 2019), <https://news.ontario.ca/maesd/en/2019/01/government-for-the-people-to-lower-student-tuition-burden-by-10-per-cent.html>.

Concern: Students are unfairly burdened with financing access to services and goods that benefit the entire university community.

Recommendation: The provincial government should increase operational funding so that there is not a disproportionate reliance on ancillary fees.

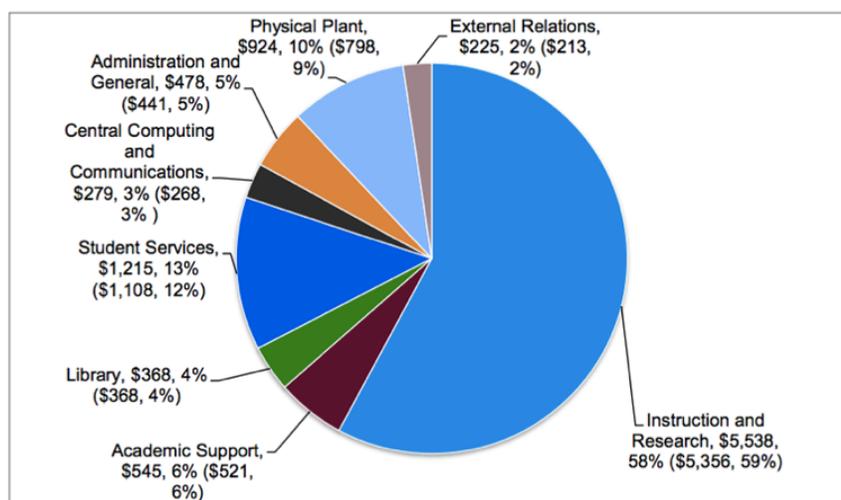
Generally speaking, university operational funding comes from two sources: the provincial government, as well as students' tuition and non-tuition fees. Students should not have to disproportionately cover the costs of operational funding. Yet, with the cost of tuition decreasing by ten percent, institutions now have less money to draw from to operate services, and these changes will cost universities \$360 million over the next two years.⁹⁰ This means that institutions will need to increasingly draw from ancillary fees paid by students. As a result, students continue to be unfairly burdened with financing access to services and goods that benefit the entire university community. To remedy this, the provincial government should increase operational funding to post-secondary institutions.

There are gaps in the current cost-sharing model. Operational costs are on the rise, while access to resources has remained fairly stagnant. The figure below represents an institution's general expense and the significant rise in cost.

Financial Report of Ontario Universities: 2017-18 Highlights (Council of Ontario Finance Officers)⁹¹

Figure 4: Operating Fund Expenses by Functional Area* - (\$ millions)

Total Operating expenses for 2017-18 were \$9,572 (Total for 2016-17: \$9,073)



(*figures in brackets are from 2016-17)

The Council of Ontario Universities finds that the funding received through the provincial government does not meet the industry standard for Current Replacement Value (CRV) for re-investing in building renewal, which is set at 1.5%. The provincial government's contribution for the for-renewal program from 2010-11 to 2014-15 was \$17.3 million annually, representing 0.10% of CRV. In 2017-18, this contribution

⁹⁰ Rushowy, Kristin. "Ford Government's Tuition Cut to Cost Universities \$360 Million and Colleges \$80 Million." *Thestar.com*, 16 Jan. 2019, <https://www.thestar.com/politics/provincial/2019/01/16/ford-governments-tuition-cut-to-cost-universities-360-million-and-colleges-80-million.html>.

⁹¹ "Financial Report of Ontario Universities: 2017-18 Highlights." Council of Ontario Universities. Accessed December 2, 2019. <https://ontariosuniversities.ca/wp-content/uploads/2019/04/COFO-Highlights-Report-2017-18-002.pdf>

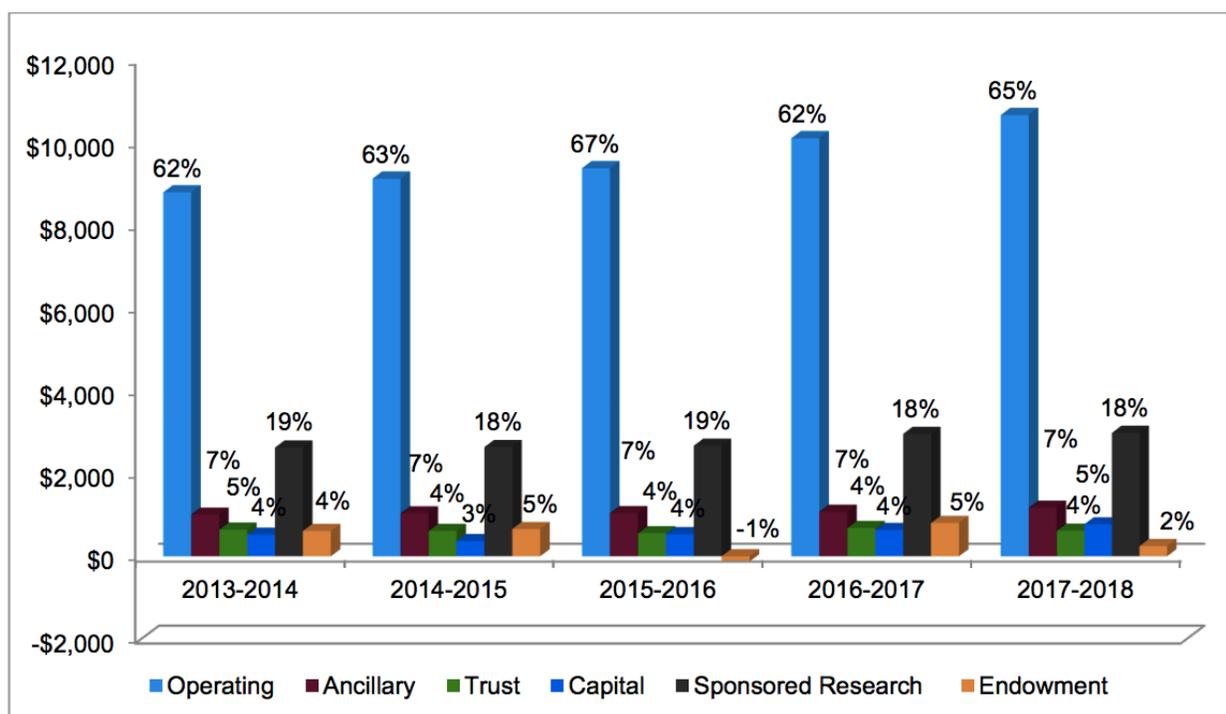
increased to \$40 million, representing 0.17% of CRV. While this is a steady increase, it does not come close to reaching the industry standard.

It is imperative that the provincial government provide support in covering operational costs for institutions. The current practice of students' ancillary fees covering a significant portion of institutional operational costs is not financially viable, given that ancillary fees account for a small percentage of revenue but are expected to cover a significant portion of operational costs.

The figure below represents the stagnant rate of revenue from ancillary fees.

Financial Report of Ontario Universities: 2017-18 Highlights (Council of Ontario Finance Officers)⁹²

Figure 2: Total Revenue by Fund – (\$millions)



In order to return to a more equitable cost-sharing model, the provincial government should provide more support through an increase of operating grants, which would alleviate some of the financial pressure on post-secondary institutions and students.

As there are limited resources within ancillary fees, assistance from the provincial government for operational costs would allow ancillary fees to be used to support other priorities, such as the health and well-being of students. Institutions would be able to allocate more funds towards programs such as peer support, athletics and recreation, and equity services.

⁹² "Financial Report of Ontario Universities: 2017-18 Highlights." Council of Ontario Universities. Accessed December 2, 2019. <https://ontariosuniversities.ca/wp-content/uploads/2019/04/COFO-Highlights-Report-2017-18-002.pdf>

CAPITAL FUNDING

Principle: Student spaces enhance the student experience and benefit the entire university community by providing critical services.

Principle: Student-focused capital projects should not be exempt from standards of responsible cost-sharing at any Ontario post-secondary institution.

Principle: If students choose to contribute to a capital project, they should have their concerns and priorities heard with respect to the management of the space or projects.

Concern: Students often have little to no oversight on projects that are being paid for by the students themselves.

Concern: There is insufficient funding for student-focused capital projects in Ontario.

Concern: Students are disproportionately responsible for financing campus building and enhancements that benefit the entire university community.

Recommendation: The provincial government should create priority funding for projects that enhance student development, such as student centres, health centres, and athletic facilities.

Recommendation: The provincial government should ensure that investment required into deferred maintenance does not exclude spaces originally funded through student ancillary fees.

Recommendation: The provincial government should mandate that, for all student-ancillary-funded spaces, agreements must be made between post-secondary institutions and student associations to establish a management structure of the project that prioritizes student concerns and priorities.

The provincial government plays a role in financing academic buildings at Ontario universities, and this has allowed for a higher quality of education across Ontario. However, when it comes to funding of student-focused spaces, the government plays almost no role. The Ontario Operating Funds Distribution Manual (2009) outlines that “ancillary facilities” – buildings which do not serve the academic function of the university – are ineligible for provincial grants. These spaces, however, often serve students’ academic and overall wellbeing indirectly.⁹³

Fitness and wellness centres play a critical role on university campuses by working to address and aid students with their physical health, mental health, and overall well-being. This help ultimately translates to greater academic success as well. One in five students are battling mental health concerns, according to a study conducted by the National College Health Assessment of about 44,000 Canadian university students.⁹⁴ Numerous studies on the topic have concluded that mental health challenges can significantly impact academic performance.⁹⁵ Left unmitigated, these struggles can lead to lower GPAs and an increased drop-out rate.⁹⁶ These statistics demonstrate how student wellness can directly impact the academic functions of universities. Athletic buildings also play an essential role. While assisting students in their physical well-being and helping prevent chronic diseases, physical activity further helps reduce

⁹³ Ministry of Training, Colleges and Universities. “The Ontario Operating Funds Distribution Manual,” (Toronto: Government of Ontario, 2009).

⁹⁴ American College Health Association “National College Health Assessment,” (2019), Retrieved from https://www.acha.org/documents/NCHA/ACHA-NCHA-III_Codebook_update.pdf

⁹⁵ Poh Keong, Pua & Pua, & Sern, Chee & Lai, & Lee, Ming Foong & Ibrahim, Che, “The Relationship between Mental Health and Academic Achievement among University Students – A Literature Review,” *Second International Conference on Global Trends in Academic Research*, 2, (2015), https://www.researchgate.net/publication/278481569_The_Relationship_between_Mental_Health_and_Academic_Achievement_among_University_Students_-_A_Literature_Review.

⁹⁶ Daniel Eisenberg, Ezra Golberstein, and Justin Hunt, “Mental Health and Academic Success in College,” *Journal of Economic Analysis and Policy*, (2009), <http://www-personal.umich.edu/~daneis/papers/MHacademics.pdf>

feelings of anxiety and depression.⁹⁷ Therefore, wellness centres and athletic centres aid students in both their overall and academic well-being.

Colds and flus are common on university campuses and, as such, many students require timely medical attention for medical documentation. It is common for students to further harm their physical health and potentially spread illnesses by attending classes while ill, due to the timely and costly nature of obtaining the medical documentation required to be excused from classes.⁹⁸ On-campus health centres can provide a more efficient, affordable, and accessible way for students to regain their health and get back in the classroom when they are ready.

Student centres provide a common space for students to study, relax, and socialize. These spaces help create an on-campus community as well, and can help students integrate to university life, which translates into improved academic performance.

There are many other student spaces that benefit the overall student experience (and the university as a whole) by providing critical services to support health, well-being, community, leadership, and more. Yet the Ontario government continues to insufficiently fund student-focused capital projects. Students have contributed hundreds of millions of dollars to these projects; conversely, while the provincial government contributed \$130,473,000 to the construction or major renovation of facilities at Ontario universities in 2015, this only included one student-focused project (the Ryerson Student Learning Centre, which was allocated 41 million dollars).⁹⁹ And while the project was awarded a sizeable sum, it left the remaining sixty-two percent of the project (over 70 million dollars) to be funded by students.¹⁰⁰ None of the remaining grant money was spent on student-focused projects.¹⁰¹

The provincial government should invest in students and prioritize the quality of their post-secondary education by funding these projects so that these projects become less financially dependent on students. Investing in student-focused projects will improve students' academic and overall development.

While the financial burdens on student spaces grow, so do the usage demands. This increased demand was heightened by a student-space survey conducted by the McMaster Students Union. The study found that eighty percent of students felt athletic facilities and student spaces were a top priority for the institution's expansion.¹⁰² With a high degree of student usage and long lifecycles, maintenance and operation costs are substantial for these capital projects to succeed. Given these costs and the burden they place on students, the provincial government should ensure that investment required for deferred maintenance of student spaces does not exclude spaces originally funded through student ancillary fees.

While disproportionate funding represents a considerable concern, lack of student control in the oversight and management of these facilities presents an additional problem. Once a student space has been completed, ownership of that space often transfers to the university — despite the fact that students are often the sole funders of these expenditures. While the ownership of these institutions varies by institution, this model has led to disputes at Canadian universities, including McMaster University and the University of Calgary.¹⁰³ To address this problem, the provincial government should mandate that student-funded spaces be accompanied by agreements between the relevant institution and student association(s) which set out a management structure that prioritizes student concerns and priorities. This mandate would prevent further disputes and increase transparency over student-funded capital projects moving forward.

⁹⁷ David R. Brown, and Curtis J Blanton, "Physical Activity, Sports Participation, and Suicidal Behavior among College Students," *Medicine & Science in Sports & Exercise* 30 (2002): 1087–1096.

⁹⁸ Canadian Medical Association, "Third Party Forms: The Physician's Role," *CMA Policy*, (2010), Retrieved from https://www.nlma.nl.ca/FileManager/Practice/docs/CMA_Policy_-_Third_Party_Form-_The_Physicians_Role.pdf

⁹⁹ Government of Ontario, "Capital Grants to College and Universities," *Government of Ontario*, Retrieved from <https://www.ontario.ca/data/capital-grants-colleges-and-universities>

¹⁰⁰ *Ibid.*

¹⁰¹ *Ibid.*

¹⁰² Scott Robinson, "Student Activity Building Survey" *McMaster Students Union* (2017). <https://www.msumcmaster.ca/posts/766>

¹⁰³ Aspinall, Lyle, "U of C Students' Union Loses Fight to Operate MacEwan Student Centre," *Calgary Herald*, October 8, 2016, <http://calgaryherald.com/news/local-news/u-of-c-students-union-loses-fight-to-operate-macewan-student-centre>

BASELINE STUDENT SERVICES

Principle: All students in Ontario’s post-secondary education system should be able to access the baseline student services that are required to safely participate in their education.

Principle: Baseline student services, which include mental health counselling, sexual violence centres and support services, and offices for students with disabilities, should demonstrate a system of responsible cost-sharing.

Principle: Non-baseline student services that support development and well-being, which include career services, academic skills services, student-run clubs, and athletics, contribute to both student success and the university as a whole.

Concern: Baseline student services, which include mental health counselling services and sexual violence centres, are often funded in part or solely by student ancillary fees at several institutions in Ontario.

Concern: Student services (baseline and non-baseline) that support student development have become almost completely dependent on ancillary fees.

Recommendation: The provincial government should fund baseline student services and supports in an effort to provide a minimum standard of safety and well-being at post-secondary institutions across the province, as institutions should not rely on students to be the primary funders of baseline fees.

Recommendation: The provincial government should fund non-baseline fees as they are critical to increasing student success, employment opportunities, and student satisfaction with their post-secondary experience.

Students should be able to feel safe, secure, and welcome at school; and any service or program that contributes to this goal should be deemed an essential fee. These baseline student services are the core assortment of services administered either by universities, student associations, or external parties in order to ensure that students can safely attend post-secondary education. The sustainability and implementation of services — which include mental health supports, education and resources, as well as sexual violence prevention — require a greater degree of accountability and must be catered to the growing demand that university campuses face. Alarming, however, these services are often funded solely by ancillary fees, many of which students are now able to opt out of under the Student Choice Initiative. As a result, the provincial government should fund baseline student services and supports in an effort to provide a minimum standard of safety and well-being at post-secondary institutions across the province. Institutions should not rely on students to be the primary funders baseline student services.

The provincial government should also fund non-baseline service fees, as these services are critical to increasing student success, employment opportunities, and student satisfaction with their post-secondary experience. Employers are seeking applicants who possess a wide range of skills. The ability for students to get involved with student leadership opportunities, student led clubs and societies, athletics and recreation, student life can change the trajectory and the value of the education that an institution is able to provide to its students, as discussed in the “Student Choice Initiative” section of this policy, above. The benefits that each of these elements provide to the success of a student, both inside and outside the classroom, are necessary for students to differentiate themselves and remain competitive in today’s workforce.

Additionally, experiences and events that cater to certain demographics are necessary for student transition, engagement, and retention. At a time when concerns around sexual violence and the need for mental health support have peaked, sixty-three percent of post-secondary students reported having been diagnosed or treated by a professional for one or more mental health conditions in the last twelve months,

with anxiety and depression being the most frequently diagnosed.¹⁰⁴ Moreover, the recent, shocking results from the provincial government’s Student Voices on Sexual Violence survey state that, of the 116,000 university students that completed the survey, sixty-three percent disclosed at least one form of sexual harassment since the beginning of the academic year.¹⁰⁵

The recommendations in this section promote a minimum baseline standard for safety at post-secondary institutions across the province — a standard which has pillars of sexual violence, mental health, accessibility, physical health, and wellness built into it.

¹⁰⁴ “NCHA-II Ontario Canada Reference Group: Executive Summary, Spring 2016.” American College Health Association-National College Health Assessment, 2016.

¹⁰⁵ “Summary Report of the Student Voices on Sexual Violence.” Student Voices on Sexual Violence. Accessed December 5, 2019. <https://files.ontario.ca/tcu-summary-report-student-voices-on-sexual-violence-survey-en-2019-03.pdf>

POLICY STATEMENT

ANCILLARY & INCIDENTAL FEES

Whereas: The provincial government implemented the Student Choice Initiative without consultation with a broad and diverse set of post-secondary sector stakeholders;

Whereas: Unpredictable financing under the Student Choice Initiative threatens the existence of student services offered by ancillary fees;

Whereas: As a result of the Student Choice Initiative, there is a high degree of unpredictability regarding ancillary fee collection amounts;

Whereas: Allowing individualized selection of ancillary fees can harm the stability of services democratically decided on by the student body;

Whereas: As a result of the Student Choice Initiative, students who are a part of marginalized communities are being impacted disproportionately by cuts in services and supports;

Whereas: As a result of the Student Choice Initiative, the financial and economic ability of student associations to provide employment, experiential learning, and other engagement opportunities is severely diminished;

Whereas: As a result of the Student Choice Initiative, post-secondary institutions and student associations are unable to predict annual changes in the ancillary fee structure;

Whereas: The current ancillary fee framework leaves ancillary fees structured in a way that difficult for students to comprehend;

Whereas: Moving forward, there is no guarantee of an open consulting process with a broad and diverse set of post-secondary stakeholder groups;

Whereas: As a result of the Student Choice Initiative, students who are a part of marginalized communities are being impacted disproportionately by cuts in services and supports;

Whereas: The Student Choice Initiative (SCI) hinders students' ability to set fees through collective democratic processes;

Whereas: Deeming student services "non-essential" puts the existence of these programs at risk and fundamentally disempowers a baseline student service for students;

Whereas: The Student Choice Initiative, in deeming student media "non-essential," endangers the ability of campus media to effectively investigate and hold institutions and student associations accountable;

Whereas: The Student Choice Initiative jeopardizes students' ability to use campus media as an outlet to engage and express their opinions;

Whereas: The current *Tuition Fee Framework and Ancillary Fee Guidelines* focus heavily on tuition, neglecting the complexity and importance of ancillary fees;

Whereas: Post-secondary institutions have significant control over which student services are funded and to what degree;

Whereas: Housing prices can be set at fully autonomous rates by universities, which could be seen as a revenue-generating mechanism in financially difficult times;

Whereas: Due to year-to-year turnover and generally inexperienced users of residence services, there may be reduced market pressure to increase the service quality of residences;

Whereas: Some post-secondary institutions charge fees for withdrawing from classes;

Whereas: Course withdrawal fees are unregulated;

Whereas: Administrative fees are often nominal but widespread, and therefore impractical to regulate on a fee-by-fee basis;

Whereas: There is no provincial regulation preventing net-revenue-generating administrative fees;

Whereas: In many cases, the provincial government has no mechanism to mandate student control of fees paid to third parties;

Whereas: Many students feel uncomfortable with third parties receiving student money and perceive a lack of accountability for third party fees;

Whereas: Students are being asked to purchase digital evaluation packages in compulsory courses, either as part of a textbook bundle or as a standalone product, and this places a significant financial burden on students;

Whereas: High and inconsistently regulated prices for textbooks, courseware, and publications in compulsory courses place a significant financial burden on students;

Whereas: Courseware for compulsory courses often changes on an annual basis, causing high-cost courseware to lose resale value for students;

Whereas: The exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines* for digital learning materials that are property of the student, which can include test/assessment tools, allows post-secondary institutions to require digital online evaluation packages in compulsory courses;

Whereas: The exemption in the *Tuition Fee Framework and Ancillary Fee Guidelines* for work placement fees allows post-secondary institutions to charge high amounts for placement services, creating an inequity among students wishing to partake in work-integrated learning;

Whereas: Students are required to purchase learning materials and clothing for compulsory courses, which places significant financial pressure on students;

Whereas: Non-optional field trip fees for compulsory courses place significant financial pressure on students, creating an inequity in students' ability to access compulsory courses;

Whereas: The purposes or origins of ancillary fees are often poorly communicated to students, limiting transparency and institutional accountability;

Whereas: The provincial term "compulsory non-tuition-related ancillary fee" is not used consistently at every Ontario post-secondary institution, which leads to inefficiency and a lack of transparency;

Whereas: It is often unclear whether fees are being charged on a per-term, per-course/credit, or flat-fee basis;

Whereas: The payment of ancillary fees is sometimes done in an inconsistent manner through many different offices and payment forms, contributing to a lack of transparency and accountability;

Whereas: Student-sponsored endowment funds are sometimes used to cover expenses that ought to be covered by tuition;

Whereas: The administration of student-sponsored endowment funds is often opaque, and information is often not readily available to contributors;

Whereas: Most student-sponsored endowment funds are funded by automatically assessed fees, which many students do not know are refundable;

Whereas: Ancillary fee protocol structures and review practices are not always transparent and accountable;

Whereas: System-wide and vendor fees are exempt from the current requirements under the Ancillary Fee Guidelines and are often implemented without student approval or consultation;

Whereas: System-wide and vendor fees represent a method for post-secondary institutions to unfairly circumvent student approval of compulsory ancillary fees;

Whereas: Compulsory ancillary fees have been used as a source of increased operating revenue by universities in Ontario, and fee amounts have increased substantially above inflation over the past two decades;

Whereas: Students are unfairly burdened with financing access to services and goods that benefit the entire university community;

Whereas: Students often have little to no oversight on projects that are being paid for by the students themselves;

Whereas: There is insufficient funding for student-focused capital projects in Ontario;

Whereas: Students are disproportionately responsible for financing campus building and enhancements that benefit the entire university community;

Whereas: Baseline student services, which include mental health counselling services and sexual violence centres, are often funded in part or solely by student ancillary fees at several institutions in Ontario; and

Whereas: Student services (baseline and non-baseline) that support student development have become almost completely dependent on ancillary fees;

Be it resolved that: The provincial government should rescind the Student Choice Initiative;

Be it further resolved that: In the event that the provincial government does not rescind the Student Choice Initiative, the Ministry of Colleges and Universities should develop an improved ancillary fee framework based on the concerns and recommendations in this section and this policy paper as a whole;

BIFRT: The provincial government should allow student associations and post-secondary institutions to determine the mandatory and non-mandatory status of fees through democratic processes;

BIFRT: The provincial government should engage in open consultations with a broad and diverse set of post-secondary stakeholder groups;

BIFRT: The provincial government should mandate that all baseline student service fees be deemed “essential” across all institutions;

BIFRT: The provincial government should mandate that ancillary fees services including, but not limited to, peer support networks, campus media, food bank, legal services, clubs administration and governance be deemed “essential” across all institutions;

BIFRT: The Minister of Intergovernmental Affairs should advocate to the Canada Revenue Agency and the Minister of National Revenue that they should deem that all ancillary fees are applicable tax exempt;

BIFRT: The provincial government should allow the mandatory/non-mandatory status of non-essential fees to be determined democratically by students;

BIFRT: The provincial government should separate the Ancillary Fee Guidelines from the Tuition Fee Framework, creating standalone ancillary fee guidelines;

BIFRT: When constructing the standalone ancillary fee guidelines, the provincial government should engage in robust consultation with a broad and diverse set of student groups, student associations, and post-secondary institutions;

BIFRT: All non-tuition ancillary fees should be overseen by bodies consisting of a majority of democratically elected or appointed student membership;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that students be given the opportunity to sit on the governing bodies of university services funded by ancillary fees;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that all university residences or housing systems have an oversight body with student representation;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that the oversight body in the recommendation immediately above shall be responsible for compiling a periodic public report on the state of the housing system, including a breakdown of aggregate revenues, operating expenditures, and contributions to any housing capital fund;

BIFRT: The provincial government should, through standalone ancillary fee guidelines, ban course cancellation fees for changes in course configurations in the first four weeks of class;

BIFRT: The provincial government should, through standalone ancillary fee guidelines, ban course withdrawal fees when students have to withdraw due to medical or mental health reasons;

BIFRT: The provincial government should establish, through standalone ancillary fee guidelines, that administrative fees must be charged at a commensurate or lower rate than the cost of providing the services funded by those fees;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that before the introduction of an administrative fee, a rudimentary assessment of the cost of providing that service be conducted, and that these assessment documents be made available to any student upon request;

BIFRT: The provincial government should establish, through standalone ancillary fee guidelines, that any fee not otherwise categorized by the standalone ancillary fee guidelines or categorized by a mutual agreement of a post-secondary institution and its student associations, shall be considered a miscellaneous fee and be treated identically to an administrative fee;

BIFRT: If a fee is classified as miscellaneous, the provincial government should mandate, through standalone ancillary fee guidelines, that this miscellaneous status remain until a stakeholder requests that the Ministry of Colleges and Universities determine the classification of the fee into another category;

BIFRT: The provincial government should mandate that student associations be given the ability to determine the democratic processes they use to approve a third-party fee when they first enter into agreement with third-party organizations;

BIFRT: The provincial government should mandate that the processes referred to in the recommendation immediately above be voluntarily agreed to by the relevant student association and third-party organization every three years;

BIFRT: The provincial government should mandate that the processes referred to in the two recommendations immediately above take precedent over any other process(es) mandated by a third-party organization;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that post-secondary institutions establish a formal and accessible complaint system or mechanism for students who are being charged fees they suspect contravene institutional policy;

BIFRT: The provincial government should review the use of digital learning materials and evaluation tools and create best practices for future use of these tools, with respect to accessibility and quality of education;

BIFRT: The provincial government should invest in open educational resources (OERs) and other online materials for instructors and incentivize postsecondary institutions to do the same;

BIFRT: The provincial government should incentivize instructors to use open educational resources (OERs);

BIFRT: To minimize instructor conflict of interest, the provincial government should task the Higher Education Quality Council of Ontario (HEQCO) with reviewing the accessibility, affordability, and quality of instructional materials developed by instructors;

BIFRT: The provincial government should invest in work-integrated learning programs on campuses to reduce these programs' dependency on student ancillary fees;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that students in work-integrated learning programs be given a detailed explanation of how work-integrated learning fees are used;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that fees for work placements be commensurate or lower than the cost of providing those work placements to students;

BIFRT: The provincial government should establish a tuition-independent cap for work-integrated learning fees across the province;

BIFRT: The provincial government should mandate that institutions provide an alternative subsidized rental or used option when compulsory courses require students to purchase learning materials and/or clothing;

BIFRT: The provincial government should invest in a program that provides envelope funding for institutions to offer affordable rental physical learning materials to students;

BIFRT: The provincial government should provide envelope funding to post-secondary institutions, which, in the form of bursaries, covers field trip costs in compulsory courses for students with demonstrated financial need;

BIFRT: The provincial government should mandate that institutions provide students with alternatives to field trips so that they can complete their compulsory course without academic penalty;

BIFRT: The provincial government should establish standalone ancillary fee guidelines, distinct from the tuition fee framework, in consultation with post-secondary institution administrators, student association representatives, and the Council of Ontario Universities (COU);

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that all fiscal material, including budgets, audits, and explanatory breakdowns of ancillary fees, be publicly disclosed in a way that is readily available to students;

BIFRT: The provincial government should mandate that the term “compulsory non-tuition-related ancillary fee” be used consistently across the sector;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that all post-secondary institutions levy and collect all ancillary fees through a centralized online system;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that student-sponsored endowment funds be considered non-essential fees and thus subject to the same approval mechanisms stipulated in the standalone ancillary fee guidelines;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that independent, student-sponsored endowment funds be required to publish their financial information and a list of sponsored projects in a way that is readily available to students who contribute to the fund;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that disbursement of student-sponsored endowment funds be primarily controlled by students;

BIFRT: The provincial government should mandate, through standalone ancillary fee guidelines, that all post-secondary institutions be required to maintain an institutional ancillary fee protocol or protocols, agreed to by both the institution and the institution’s student association(s), which would include terms of categorization, approval, and review of various fees, subject to provincial guidelines;

BIFRT: The provincial government should develop an institutional ancillary fee protocol structure that can be provided as a best practice example for post-secondary institutions. This structure should establish high-level roles and procedures for fee recommendations, approvals, collection and remittance;

BIFRT: The provincial government should introduce, through standalone ancillary fee guidelines, restrictions that ban universities from deducting (from the fees collected) administrative expenses for the collection or remittance of those fees;

BIFRT: The provincial government should eliminate both the system-wide and vendor fee exemptions from the *Tuition Fee Framework and Ancillary Fee Guidelines*;

BIFRT: The provincial government should increase operational funding so that there is not a disproportionate reliance on ancillary fees;

BIFRT: The provincial government should create priority funding for projects that enhance student development, such as student centres, health centres, and athletic facilities;

BIFRT: The provincial government should ensure that investment required into deferred maintenance does not exclude spaces originally funded through student ancillary fees;

BIFRT: The provincial government should mandate that, for all student-ancillary-funded spaces, agreements must be made between post-secondary institutions and student associations to establish a management structure of the project that prioritizes student concerns and priorities;

BIFRT: The provincial government should fund baseline student services and supports in an effort to provide a minimum standard of safety and well-being at post-secondary institutions across the province, as institutions should not rely on students to be the primary funders of baseline fees; and

BIFRT: The provincial government should fund non-baseline fees as they are critical to increasing student success, employment opportunities, and student satisfaction with their post-secondary experience.