From Worst to First

How Nova Scotia Can Lead the Pack on Student Financial Assistance

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Abstract

Student financial assistance (SFA) programs are the primary instruments the governments of Canada and Nova Scotia use to reduce financial barriers to post-secondary education (PSE) access and reduce the debt burdens faced by students when they finish their studies. In this paper, we critically review the complex array of SFA policies and programs to: (i) encourage and assist Canadians to save for the education of their children; (ii) provide direct assistance to current students in need through student loan and/or grant programs; and (iii) help students manage the repayment of their debt and further subsidize investments in PSE through federal and provincial tax systems. Our analysis focuses on how these SFA programs and policies either promote or detract from the accessibility and affordability of PSE in Nova Scotia. Our key findings indicate that: access to Nova Scotia's PSE system has changed little since the early 1990s; a lack of reliable systemic data makes it difficult to draw clear linkages between SFA policy and access to education; recent changes to SFA programs have already helped to reduce the cost and debt burdens on many students; and finally, government investments in pre-study savings programs and post-study tax credits heavily favour higher income Nova Scotians at the expense of promoting accessibility and affordability for individuals with the greatest financial need. Based upon these findings, StudentsNS recommends a package of incremental proposals aimed at creating the strongest, most progressive student financial assistance program in Canada. Our recommendations begin with a reallocation of poorly targeted provincial government funds to improve PSE accessibility and affordability for needy students and underrepresented groups. We seek to extend additional funding to students when they are studying and, at the same time, greatly reduce the burden of student debt for all provincial student loan borrowers.

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Recommendations

The Province of Nova Scotia and all interested PSE stakeholders should join with StudentsNS to investigate the existing social barriers to PSE access and create a comprehensive strategy to eliminate these barriers, including a commitment to collecting and disseminating system-wide data on accessibility.

The Province should engage the federal government to encourage reinvestment of pre-study student financial assistance spending on programs that enhance accessibility and affordability for Nova Scotians. In particular, it should advocate that Nova Scotians receive a proportionate share of pre-study financial assistance investment, relative to the size of our population.

The Province of Nova Scotia should eliminate the Graduate Retention Rebate, the Tuition and Education Tax Credit, and the Student Loan Interest Tax Credit. All current and future cost savings should be reinvested in student financial assistance to improve accessibility and affordability of post-secondary education.

The Province of Nova Scotia should eliminate the limit on provincial student financial assistance, currently $180 per study week, for all SFA-eligible students studying at public institutions in Nova Scotia.

The Nova Scotia Student Assistance Program should develop and implement mechanisms to inform all students about the existing student assistance appeals process and to make the Higher Appeals Board more accessible to individuals across the Province.

In consultation with StudentsNS and representative students, the Nova Scotia Student Assistance Program should work to make the appeals/dispute resolution process as compassionate as possible for all students but in particular those individuals facing serious and verifiable health issues.

When assessing student assistance applications, the Nova Scotia Student Assistance Program's calculation of expected resources should give consideration to additional student and/or family costs, including, but not limited to, registered retirement savings and registered education savings for dependent children or registered disability savings for any family members. With appropriate documentation, an applicant's resources calculation should be reduced by the actual amounts contributed to a registered pension plan (RPP), registered retirement savings plan (RRSP), a registered education savings plan for a dependent child (RESP), and/or a registered disability savings plan (RDSP).

The cost allowances used by the Nova Scotia Student Assistance Program to calculate each applicant's available resources should be sufficient to allow all applicants (and/or their families) a similar standard of living, regardless of the applicant's student category.

The Province of Nova Scotia should develop and execute a public education campaign using moral suasion to inform parents about the costs of post-secondary education in Nova Scotia and educate them about the risks their children face without financial help.

The Province of Nova Scotia should provide supplementary student loans to dependent students with parents who cannot or will not contribute the expected funding to their child's education.

Together with StudentsNS, the Province of Nova Scotia should commit to studying its approach to debt relief for students repaying supplemental student loans.

The Province of Nova Scotia should develop an engaging and user-friendly informational web portal that clearly explains the essential features of the student assistance program, from application to repayment.

The Province of Nova Scotia should create an interdepartmental strategy for disseminating information about the student financial assistance program between the Department of Labour and Advanced Education and the Department of Education and Early Childhood Development. The key objective of this strategy should be to deliver timely, accurate information on post-secondary education and student financial assistance to students within Nova Scotia's public education system.

Students reliant on government loans to finance their education should be provided with all necessary information to better understand their potential debt burden throughout their program of studies. At a minimum, this should include a clear explanation of the total amount of repayable financial assistance being offered, a reminder of any existing debt the borrower already holds, and the expected terms of repayment based on the total estimated debt amount.

The Province of Nova Scotia should provide all provincial student financial assistance in the form of an up front grant for students studying at a public post-secondary institution in Nova Scotia.

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Statement of Values

Students Nova Scotia is built upon the belief that post-secondary education can play a fundamental role in allowing both the individual and society to realize their full potential. Students Nova Scotia's values are pillars built upon this foundation. They give direction to Students Nova Scotia's work and reflect our organizational goals.

ACCESSIBILITY: Every qualified Nova Scotia student who wishes to pursue post-secondary education should be able to do so, irrespective of their financial situation, socioeconomic or ethnic background, physical, psychological or mental ability, age, sexual orientation, geographic location, or any other factor exogenous to qualification.

AFFORDABILITY: The cost of post-secondary education in Nova Scotia should not cause undue hardship upon any student, restrict their ability to pursue the career path they choose, or make them financially unable to live in the community of their choice.

QUALITY: Policies, programs, and services in post-secondary education should meet student expectations to help prepare them for lifelong success, including in their citizenship, careers, and personal wellbeing.

STUDENT VOICE: Nova Scotia students must be empowered to actively participate in setting their post-secondary system's direction via engagement through their representative student bodies, within the post-secondary institutions themselves, and through the broader democratic process.

Our Research Process

Position papers are the primary outputs of our research. They aim to describe and clearly articulate Students Nova Scotia's *Principles* in approaching an issue, and *Concerns* that obstruct the realization of those principles. Finally, we propose *Recommendations* aimed at addressing the policy issues (and our specific concerns) in a manner that is consistent with our organization's values.

The Students Nova Scotia Board of Directors is comprised of student representatives from our eight member associations. It sets annual priorities for Students Nova Scotia activities, including research. Position Papers represent formal Students Nova Scotia policy and are approved by the Board of Directors at bi-annual Board Policy Retreats, following a draft's one-month release for consultations with students.

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List of Common Abbreviations

ATI	After-tax income
CESG	Canada Education Savings Grant
CSGs	Canada Student Grants
CSL	Canada Student Loan
CSLP	Canada Student Loans Program
CUSC	Canadian University Survey Consortium
ESDC	Employment and Skills Development Canada
GIC	Guaranteed Investment Certificates
GRR	Graduate Retention Rebate
IA	Income assumptions
LAE	Nova Scotia Department of Labour and Advanced Education
LLP	Lifelong Learning Plan
MBM	Market Basket Measure
MOU	Memorandum of Understanding
MPHEC	Maritime Provinces Higher Education Commission
MSOL	Moderate Standard of Living
NSCC	Nova Scotia Community College
NSLSC	National Student Loans Service Centre
NSSAO	Nova Scotia Student Assistance Office
NSSAP	Nova Scotia Student Assistance Program
NSSB	Nova Scotia Student Bursary
NSSL	Nova Scotia Student Loan
OECD	Organisation for Economic Cooperation and Development
OOPSB	Out-of-Province Student Bursary
PC	Parental Contribution
PCC	Private career college
PSE	Post-secondary education
PSR	Pre-Study Report
PSTC	Post-Secondary Tax Credit
RAP	Repayment Assistance Plan
RDSP	Registered Disability Savings Plan
RESP	Registered Education Savings Plan
RPP	Registered Pension Plan
RRSP	Registered Retirement Savings Plan
SFA	Student financial assistance
SI	Surplus Income
StudentsNS	Students Nova Scotia
TuEdTx	Tuition, education and textbook tax credits

1. Introduction

StudentsNS prioritizes the *accessibility* and *affordability* of post-secondary education (PSE) as two of our foundational values because we believe that education is critical to the growth and development of individual Nova Scotians, their families, their communities, and the Province as a whole. These values are deeply rooted in some critical facts: first, that nearly three quarters of new Canadian jobs require a PSE credential (Employment and Skills Development Canada — ESDC, 2013); second, that the average PSE graduate still earns significantly more than the typical high school graduate over a working lifetime (OECD, 2013);[1] and finally, that the myriad social benefits of PSE are an indispensable public good and at least as valuable as the more readily quantifiable private financial benefits. In short, access to PSE for Nova Scotians is absolutely critical to the financial and social security of individuals, and also to the creation of a more prosperous, more just, and more harmonious province.

Unfortunately, many Nova Scotians continue to face significant economic and/or social barriers to the pursuit of a college diploma or university degree. These barriers may include one's financial circumstances, gender, ethnicity, age, personal disability, or parental socioeconomic status or educational background. In combination, they contribute to a vicious cycle: preventing already disadvantaged individuals from reaching their full potential and increasing the likelihood that disadvantage will be passed on to future generations.

Financial need is one barrier that often unifies individuals from different underrepresented groups in Nova Scotia's PSE system. In this way, the *accessibility* of Nova Scotia's PSE system is intrinsically linked to its *affordability* for the individual student. Unfortunately, pursuing PSE in Nova Scotia continues to get more expensive even as the incomes of most Nova Scotians stagnate. Average university tuition for the typical Nova Scotian undergraduate has increased 165% since 1992 (MPHEC, 2013) while cost-of-living has risen 50% (Statistics Canada, 2013-Table 326-0021). In stark contrast, Nova Scotia's median family income has grown little more than 10% over the same period (Statistics Canada, 2013-Table 202-0410). Finally, the youth job market has remained stubbornly weak, especially since the 2008 recession, hindering students' ability to self-finance their education and weakening returns on PSE investments (Statistics Canada, 2013-Table 282-0087).

Each of these factors contributes to the ongoing problem of high student debt. Fully 70% of all Nova Scotia university students must borrow at least some money to pay for their education, with a majority of these students borrowing primarily from government (CUSC, 2012). Based on the most recent national data, Nova Scotia continues to have Canada's highest university graduate debt levels at $30,128 (Statistics Canada, 2008; CUSC, 2009). More current provincial student loan data suggest that overall debt levels have changed little since 2009: the average federal student loan has increased by $265 (to $6,800), which is offset by a $252 decrease in the average provincial loan (to $2,970) (Nova Scotia Student Assistance Office — NSSAO, 2013).[2] Finally, and most troublingly for Nova Scotia, Maritimers with high debt are much less likely to live and work in their home province after graduation than other Canadian university graduates (32% versus 18% nationally) and than those who have less debt (CASA, 2010). Thus, student debt is, arguably, a key factor preventing Nova Scotia from retaining its youth and reaching its full social and economic potential.

In Canada, student financial assistance (SFA) programs are the primary instruments our governments use to reduce financial barriers to PSE access. Nova Scotia's student financial assistance framework is comprised of two different assistance providers, delivering many SFA programs, at multiple intervention points, to serve a diverse student population. In this paper, we critically review the complex array of SFA policies and programs provided by the federal government and the Province of Nova Scotia. Briefly, governments take three basic approaches to make PSE more affordable to Canadian students. They provide:

- *Pre-Study* Financial Assistance, encouraging and assisting Canadians to save for the education of their children (i.e. through approved investment vehicles) (see Section 3);
- *In-Study* Financial Assistance, operating student loan and/or grant programs providing direct assistance to current students with financial need (see Section 4); and
- *Post-Study* Financial Assistance, helping students to manage the repayment of their debt and utilizing the federal and provincial income tax systems to further subsidize the investments in education after the fact (see Section 5).

Given this complexity, it is perhaps unreasonable to expect students and their families to make sense of the programs available to them. Demystifying these programs and policies is one critical objective of this project. However, we will primarily analyse how SFA programs and policies either promote or detract

1 The magnitude of this premium is subject to serious debate and is known to be smaller in Canada than in most other affluent countries, largely due to underemployment of graduates (OECD, 2012; *StudentsNS*, 2013).

2 Provincial figures do not account for the impact of the debt cap (see Section 4 for further details).

from the accessibility and affordability of PSE in Nova Scotia, especially for individuals with the most financial need. Our key findings show that:

- Since 1992-93, access to Nova Scotia's universities has changed little, with enrolment of Nova Scotia residents declining more-or-less proportionately with the youth population.
- Access to full-time college programs has nearly doubled, to approximately 12,000 students, due largely to expansion of the NSCC since 2003.
- Clear linkages between SFA policy and access to education are difficult to make due to a lack of systemic data and insufficient passage of time since recent policy changes.
- Changes to provincial In-Study and Post-Study SFA programs have helped to reduce the cost and debt burdens on many students but significant room for improvement remains.
- Pre-study SFA programs and Post-Study Tax Credits favour higher income Nova Scotians at the expense of promoting accessibility and affordability for individuals with the greatest financial need.

Based upon these findings, *StudentsNS* recommends a package of incremental proposals aimed at creating the strongest, most progressive student financial assistance program in Canada by:

1. Improving accessibility to PSE for underrepresented groups in Nova Scotia;
2. Providing students the money they need while they study; and
3. Reducing the burden of student debt on graduates.

2. Evaluating Accessibility in Nova Scotia's PSE System

To even begin evaluating the accessibility of Nova Scotia's PSE system, our definition of 'accessibility' must be formally operationalised. How would we know, for example, whether accessibility has increased or decreased as the result of a particular policy change? Making this determination is particularly difficult because the concepts of accessibility and affordability are intertwined. Clearly, PSE cannot be considered accessible if it is not affordable, but for some, accessibility to PSE is often incorrectly reduced to being primarily a cost consideration (i.e. high tuition means inaccessible, and vice versa). In reality, of course, accessibility is much more complicated than this. It has a cost component, to be sure, but it is equally important to recognize all of the other factors that may stand as barriers to PSE access: ethnic or cultural background, age, sexual orientation, family educational history, and so on.[3]

PRINCIPLE: Every qualified Nova Scotia student who wishes to pursue post- secondary education should be able to do so, irrespective of their financial situation, socioeconomic or ethnic background, physical, psychological or mental ability, age, sexual orientation, geographic location, or any factor other than qualification.

PRINCIPLE: The cost of PSE in Nova Scotia should not cause undue hardship upon any student or make them financially unable to live in Nova Scotia.

PRINCIPLE: The concepts of accessibility and affordability of post-secondary education are not equivalent to one another, but are inextricably linked.

Of course, financial accessibility is the primary focus of this paper, so we are left with the challenge of how to measure it. Analysing the various SFA programs and the policies defining who is eligible for them is very helpful in identifying areas where the existing SFA framework may be weakest (see Sections 3 to 5). On its own, however, this tells us little about how the potential population of PSE students responds to actual SFA policy change. With all of this in mind, it is useful to first take a step back and look at the big picture: to observe accessibility as reflected by two different sets of system-level metrics: changes to PSE enrolment over time and total funding for SFA programs.

2.1. Enrolment as a Measure of Accessibility

From our previous work, we know that Nova Scotia's university system has grown substantially since the early 1990s (*StudentsNS*, 2013). That growth has come as a result of large increases to the out-of-province and international student populations, which grew by 66% and 185%, respectively between 1992/93 and 2010/11, and have helped to offset a 17% decline in Nova Scotia resident enrolment (Table 2-1) (MPHEC, 2013)[4].

In this report we are primarily interested in PSE accessibility to Nova Scotian students, as they are the targets of provincial SFA programs. It therefore makes sense that we exclude students from all other locales from this analysis. Notably, the decline in Nova Scotia's resident university population (-17%) slightly surpasses the overall rate of decline in Nova Scotia's youth population over the same period (-16%). On its own, this might imply a very modest decrease in university accessibility for one or more groups, but more detailed student population data would have to be further parsed to be certain and such data is not readily available.

Figure 2-1 shows total enrolment at Nova Scotia universities and enrolment of Nova Scotia residents in those universities plotted together in Chart A. Meanwhile, Chart B plots total Nova Scotia Community College (NSCC) enrolment in (blue).[5] From these charts, it is clear that the NSCC student population has been the sole driver of internal public PSE enrolment

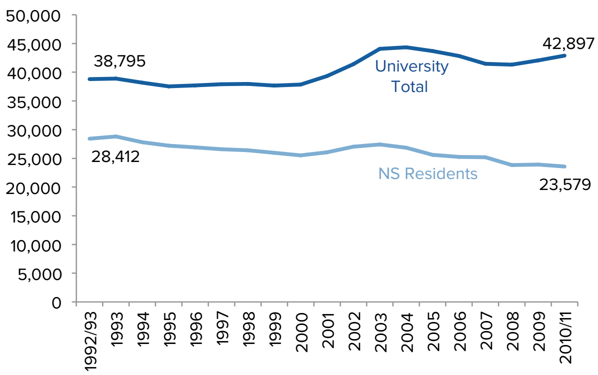
3 These issues will be explored more fully in an upcoming project focusing on the social determinants of access to PSE in Nova Scotia.

4 2010/11 was chosen as the comparison year because this is the last year for which enrolment data were available for universities, NSCC, and Private Career Colleges. Looking at university enrolment data alone up to 2012/13, overall growth of OOP and International students was even higher, at 72% and 272% respectively (MPHEC, 2013b).

5 Based on the available data from more recent years, we estimate that between 90 and 95% of the annual college student population is made up Nova Scotia residents. In the absence of data for each year in the sample, we assume a constant population share of 95% in all plots and calculations. By doing so, we maximize our estimate of the overall accessibility increase.

FIGURE 2-1. Nova Scotia's Post-Secondary Student Population Over Time

A. Total University Enrolment in Nova Scotia (1992/93 to 2010/11)



B. NSCC Enrolment and PCC Program Completions 1992/93 to 2010/11

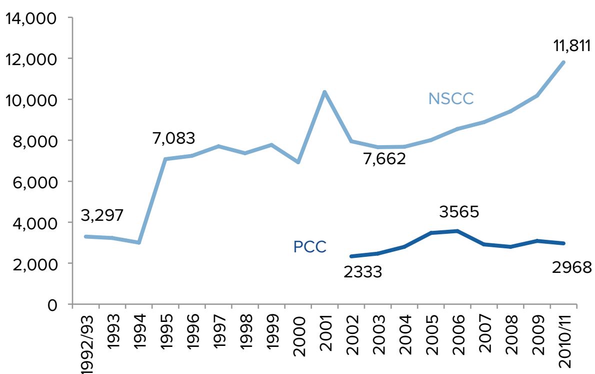


Table 2-1a. PSE Enrolment Change 1992/93 to 2010/11

STUDENT ORIGIN	% CHANGE	# OF STUDENTS
Nova Scotia	-17%	-4,833
OOP	66%	5,646
International	185%	3,289
TOTAL-UNI	11%	4,102

Table 2-1b. PSE Enrolment Change of Nova Scotia Residents 1992-2010

STUDENT ORIGIN	% CHANGE	# OF STUDENTS
NS-University	-17%	-4,833
NS-College	67%	4,492
NS PSE-Total	-1%	-341

Table 2-1c. Annual Progam Completions in Nova Scotia's Private Career Colleges

YEAR	STUDENT ORIGIN		NS RESIDENT SHARE
	NS RESIDENT	ALL STUDENTS	
2012/13	2593	2633	98%
2012/11	2721	2960	92%
2010/11	2777	2968	94%
2009/10	2967	3083	96%
2008/09	2672	2798	95%
2007/08	2756	2913	95%
2006/07	2992	3565	84%
2005/06	3054	3472	88%
2004/05	2517	2797	90%
2003/04	2261	2465	92%
2002/03	2183	2333	94%

These statistics range from 2003 to 2013 for all students who completed their program between the September 1 – August 31 school year. Data on the number of students enrolled in each year are not available.

For Nova Scotia Students, this data is based on students who have either a current address or a next of kin address in Nova Scotia. This does not necessarily mean the student is a permanent resident of Nova Scotia.

growth in Nova Scotia over this period (MPHEC, 2013; Statistics Canada, 2013-Table 477-0019). It is important to clarify, however, that some of NSCC's 'growth' observed in Chart B represents changes in data reporting, rather than real increases in enrolment:

- While it appears that NSCC's population more than doubled (3,000 to 7,000) in a single year (1994/95 to 1995/96), this primarily reflects administrative changes and very little, if any, real growth in students attending NSCC.[6]
- Similarly, changes to statistical reporting methodology are largely responsible for NSCC's sudden student population spike to over 10,000 students in 2000/01, which then dropped quickly back below 8,000 by 2003/04.[7]
- Finally, beginning in 2003/04, NSCC's student population began a steady climb back up to 11,811 by 2010/11, representing average annual growth of 6.5%. This real growth phase can be attributed largely to concerted efforts at growing the NSCC, beginning with a provincial investment of $123 million in 2003 to build NSCC's Waterfront Campus in Dartmouth and to upgrade facilities at campuses around the Province.

After accounting for the various caveats, real enrolment at NSCC has grown significantly (67%) since 1992/93, from a starting place of about 7,000 students to an all-time high of nearly 12,000 by 2010/11.

Of course, to round out our PSE enrolment analysis, we must also consider enrolment conditions at Nova Scotia's numerous private career colleges (PCCs) because students attending government-approved PCCs are also eligible for most government SFA programs (see Appendix A online for a current listing of designated institutions in Nova Scotia). Unfortunately, enrolment data for Nova Scotia's PCCs is harder to access and of lesser quality. As such, the PCC data presented in Figure 2-1 Chart B (red) and Table 2-1c is based on the number of program completions (not total enrolment) in any given year and is only available back to 2002/03.[8] This data is not directly comparable to university and NSCC enrolment data, but is included here to capture as much of the PSE enrolment landscape as possible. It indicates 19% growth in PCC completions over the last 10 years (2002/03-2012/13), which, given the size of the PCC population, has little overall impact on the overall direction of PSE growth.

Overall, while Nova Scotia has improved access to its community college system (and possibly its PCC system), PSE access for Nova Scotians, as measured by total enrolment, has stagnated (Table 2-1). In fact, the impressive growth in the NSCC ranks falls just short of offsetting the losses in the university population (net loss of 341 students)[9]. Based on the overall make-up of the college student population, however, it may be reasonable to assume that NSCC and PCC growth have helped to improve accessibility for certain underrepresented groups.

- The gender balance in college enrolments is very close to 50/50, whereas the balance in university enrolment favours women with a split closer to 60/40.
- Historically, lower income individuals are more likely to choose vocationally oriented programs over university.
- Based on student loan data, we can also see that students with dependents make up a much larger share of the college population (particularly the PCC population).

Increased access for any of these groups could be an unreservedly positive outcome. Unfortunately, a lack of system-wide enrolment and participation data on many of these subpopulations makes it difficult to draw firm conclusions as to how much accessibility has actually changed.

Moreover, none of the above provides any certainty that changes to SFA programs are at the root of this increase. To the contrary, the driving force behind this growth is clearly a concerted effort to expand enrolment in Nova Scotia's college system (Table 2-1 a/b).[10] We do know, however, that many members of underrepresented groups encounter financial barriers, among others. In addition, we know that a significant

6 In 1995/96, a number of Regional Vocational Schools previously managed by Public School Boards were incorporated under the NSCC banner, resulting in and transfer of existing 'spaces' into the NSCC enrolment portfolio. In addition, changes to the method of counting and reporting trades programs also contributed to the increase (NSCC Staff Personal Communication, 2013).

7 NSCC's transition to a new statistical software package in 2001/02, combined with the inclusion of existing Adult Learning students in the full count, explains the spike. Most of the anomalous spike is attributable to students in part-time programs, which were handled differently by the new data management software (NSCC Staff Personal Communication, 2013).

8 LAE Staff, Private Career Colleges Division, Personal Communication, 2013.

9 Given data differences, it is not appropriate to include the available PCC data as part of this analysis. Their inclusion would not, however, change the overall picture of a PSE system with stagnating growth.

10 Here it is also important to mention that the college figures do not include 10,000 to 15,000 part time students that access short-term programming over the course of a given year. These are not subject to SFA programs but they should nonetheless be noted as a component of our college system.

share of all Nova Scotia resident students will use one or more SFA programs while pursuing their studies, including 30% of Nova Scotia resident NSCC students and 45% of PCC students. So it is fair to conclude that many of these students would not have been able to access PSE if In-Study SFA programs were not available. In this way, strong SFA programs are surely indispensable to enhancing accessibility for disadvantaged persons, and government investments do demonstrate meaningful commitment to accessibility, affordability, and student debt reduction. Much better socioeconomic data on the population of PSE students and the subpopulation of SFA recipients though would help government to ensure its policies area as impactful as possible, however.

CONCERN: A lack of data on the post-secondary participation of different social groups hinders effective policy analysis on the accessibility and affordability of PSE for Nova Scotians.

2.2. Government SFA Funding as a Measure of Accessibility

It is important to discuss the costs of the currently existing SFA programs: firstly because these programs are used by more than half of all resident PSE students in Nova Scotia (NSSAO, 2013); and secondly because understanding where governments choose to invest provides useful insights into their priorities. Table 2-2 summarizes the costs of most of the major SFA programs discussed in this document — programs available to students before, during, and after their studies. At a total cost of $291 million for all Nova Scotia PSE students in 2012-13 ($225 million for those studying in-province), government investments in SFA are clearly significant. We estimate that those spent on Nova Scotia residents studying in Nova Scotia break down as follows:

- Pre-Study investments make up 5% of the total, In-Study investments 62%, and Post-study investment 33%;
- Federal investment accounts for 68% of the total amount with provincial investment making up the remaining 32%; and
- Provincial tax credits account for $29.7 million in expenditures: equivalent to 40% of the combined federal-provincial Post-study investment and 80% of the total provincial investment.[11]

Based on the above, the key question is whether these investments are having the desired impacts of making PSE more accessible and affordable to Nova Scotians and just as importantly, whether we could reallocate any of these funds to have even greater impact.

Table 2-2. Summary of 2012 Government Expenditures on Student Financial Assistance for Nova Scotians

	STUDYING ANYWHERE	IN NS
PRE-STUDY	14,350,000	10,776,850
Canada Education Savings Grant	12,600,000	9,462,600
Canada Learning Bond	1,750,000	1,314,250
IN-STUDY		
Federal	129,162,117	103,232,609
Canada Student Loans	107,982,255	85,490,197
Canada Study Grants	21,179,862	17,742,412
Provincial	47,884,150	35,797,053
Nova Scotia Student Loans	30,592,271	22,742,177
Nova Scotia Student Grants	17,291,879	13,054,876
POST-STUDY		
Federal	49,995,482	37,731,102
Education Tax Credits	46,215,148	34,707,576
Repayment Assistance	3,780,334	3,023,526
Province	49,257,588	36,992,449
Education Tax Credits	18,348,033	13,779,373
Graduate Retention Rebate	21,238,555	15,950,155
Provincial Repayment Assistance	1,071,000	804,321
Debt Cap	8,600,000	6,458,600
TOTAL	**290,649,337**	**224,530,063**

Unfortunately, looking at aggregate financial inputs in isolation really tells us very little about these issues. In fact, it is only through in-depth, evidence-based program evaluation that we can truly assess the impacts of these investments. But again, such analyses are intensely difficult to perform without adequate descriptive data on the socioeconomic characteristics of our student population.

In addition to data limitations, the complex mix of SFA programs in Nova Scotia makes it extremely difficult to isolate and assess the impact of any one program or policy on PSE accessibility. It is equally difficult to assess the impact of each marginal investment or policy change, which is particularly true of very

11 Upon full implementation of the Graduate Retention Rebate in 2014, provincial education tax credit expenditures are conservatively projected to reach upwards of $64 million (see Section 6 for further details).

recent changes.

In spite of these difficulties, the sections to follow use the best available evidence to review and critically analyse the full suite of existing policies and programs in Pre-Study Financial Assistance (Section 3), In-Study Financial Assistance (Section 4), and Post-Study Financial Assistance (Section 5). We conclude with recommendations designed primarily to enhance the SFA package available to Nova Scotians facing the largest financial barriers to PSE access.

PRINCIPLE: Expanding access to PSE for individuals with high financial need is prioritized.

3. Pre-Study Financial Assistance

The Government of Canada has a number of programs in place to help students and their families accumulate savings to pay for future education. These take the form of registered investments and/or targeted cash grants.

3.1. Investment Vehicles

A. REGISTERED RETIREMENT SAVINGS PLAN (RRSP) – LIFELONG LEARNING PLAN (LLP)

The LLP allows students with an existing RRSP to withdraw up to $20,000 over a four-year period from their RRSP to finance full-time training or education for themself of their spouse (or common-law partner), but not for a child (Canada Revenue Agency, 2013). The withdrawn amounts are not included as income and must typically be repaid to the RRSP within a 10-year period from the date of each withdrawal. Any amounts not repaid when due are included as income in that year. While the LLP program may apply to students of any age,[12] this policy is more likely to apply to students who have had more time (and earnings) to contribute to RRSPs, e.g. mature students and/or students pursuing graduate or professional degrees, diplomas or other training.

The RRSP-LLP is not an education savings vehicle, per se, but does create another potential source of PSE funding for those that have previously invested in an RRSP. In fact, Nova Scotia's student assistance policy requires applicants to declare any existing RRSPs as financial resources in their applications for assistance, with an exemption of $2,000 annually for each year since the applicant has left high school (see Section 4, Table 3 for details). Given this requirement, the special RRSP-LLP rules allowing withdrawals without immediate tax penalty are fair and appropriate.

B. REGISTERED EDUCATION SAVINGS PLAN (RESP)

An RESP is a savings or investment account registered with the Government of Canada and held at a financial institution (e.g. bank, credit union, financial planner). Long before their first tuition payment is due, a child's loved ones may begin contributing to an RESP account on their behalf.[13] There is a $50,000 lifetime contribution limit for each individual beneficiary, though a single child may be named as a beneficiary in multiple RESPs. Additional RESP contributions can be made until the beneficiary turns 31 years of age and all proceeds must be used no later than 35 years after the RESP account is created (Canada Revenue Agency, 2005).

Contributions to an RESP may be packaged into a number of common investment vehicles, at varying levels of risk and return, including: regular or high-interest savings accounts, bonds, guaranteed investment certificates (GICs), mutual funds, or stocks. Each of these investment products has its own inherent risks, as well as administration fees, and/or penalties that may apply for failing to contribute or making early withdrawals. These features vary by financial institution.

RESP contributions are not tax deductible for the contributor but any earned interest is sheltered until the recipient withdraws funds. Since the recipient is a student, the interest is typically taxed at the lowest income tax rate and, in combination with other student deductions and credits, usually amounts to little or no tax payable.

3.2. Federal Government Grants — Canada Education Savings Program

The Canada Education Savings Program, funded and administered through Employment and Social Development Canada (ESDC)[14] has two distinct components: the Canada Education Savings Grants and the Canada Learning Bonds (ESDC, 2013a).

A. CANADA EDUCATION SAVINGS GRANT (CESG)

The CESG programs are structured to incentivize families to begin saving early for the PSE of their children. First introduced in 1998, the CESG program has since been modified to expand income eligibility (2005) and

12 In Canada, an individual may begin contributing to an RRSP as soon as they have employment income to file a tax return. At that point, an individual may claim up to 18% of the previous year's earned income up to a maximum amount (e.g. in 2013 the amount is $23,820).

13 There are three types of RESPs available:
- Individual RESPs: You can save for one child whether or note they are related to you.
- Family RESPs: You can save for one or more children related to you (by blood/adoption) using one RESP account.
- Group RESPs: Similar to many retirement funds, you can combine your contributions with those of others into a pooled investment fund and draw your share of the earnings when needed.

14 In September 2013, Human Resources and Skills Development Canada (HRSDC) became ESDC.

total benefit size (2007). In its current form, there are two components to the CESG.

1. CESG-B (Basic Grant) — Regardless of family income, this grant provides a 20% supplement to the contributions made to your RESP account each year, up to a maximum of $500. Thus, an annual contribution of $2,500 (an average of $208.33 monthly) is necessary to achieve the maximum CESG-B benefit in any given year.
2. CESG-A (Additional Grant) — This grant provides an additional supplement to the Basic CESG for low and middle-income families with children 18 and under.
    a. Low-income families (i.e. families that qualify for the National Child Benefit Supplement (NCBS) through the Child Tax Benefit (CTB) program, see Table 3-1), receive an additional 20% on the first $500 in annual contributions (i.e. maximum benefit of $100);
    a. Middle-income families (approx. $43-84k) receive an additional 10% (or maximum $50) on the first $500 in contributions.

In addition to the annual maxima, there is a combined lifetime CESG limit of $7,200 for each beneficiary (the sum of CESG-B and CESG-A).

B. CANADA LEARNING BOND

The Canada Learning Bond (CLB), first introduced in 2005, targets students from low-income families. To be eligible for the CLB, a student must have been born after December 31, 2003 and their family must receive the NCBS (see above). Based on the eligibility criteria, students currently engaged in PSE studies are not affected by this program (since the oldest potential beneficiary is currently less than 10 years old).

Nevertheless, to eligible families, the CLB consists of a $500 grant in the first year of eligibility and an additional $100 for every additional eligible year until the child turns 15 years of age. Thus, the maximum benefit for each child is $2,000 (assumes investment in year 1 and retaining low income status for all 15 years). These grants are added to an existing RESP account, with any earned interest subject to the same conditions as interest on principal contributions.

3.3. Accessibility Impact of Pre-Study SFA Programs

The existing federal programs designed to encourage education savings are a mixed bag from an accessibility perspective.

First, it is essential that governments take steps to encourage parents to think about and hopefully, plan financially for, the future education of their children. This is especially important for families that might not think about PSE until much later, if at all (e.g. families without a history of PSE attendance, low-income families). To the extent that the CESG and CLB programs help to raise awareness of PSE and encourage savings, these programs may be viewed in a positive light.

Indeed, program uptake of the CESG and CLB has steadily increased as the programs have matured (Table 3-2), thus indicating that, on a percentage basis, more and more Nova Scotians (and Canadians) are starting RESP accounts, at the very least to establish eligibility for CESGs and the CLB (ESDC, 2013b). With respect to encouraging savings behaviour, 97% of the cumulative 499,000 CLB beneficiaries in Canada have also received a combined $1.8 billion in RESP contributions since 2005 (an average of $3,733 per beneficiary).

On the other hand, increasing participation in these programs does nothing to mask the large proportion of otherwise eligible individuals who are not currently benefitting from these financial incentives. Nova Scotia's participation lags that of Canada for both programs, while overall participation in the targeted CLB programs lags participation in the CESG (a universal program with a small targeted component) both provincially and nationally. With over 80% of eligible individuals in Nova Scotia not receiving the CLB, it is clear that these benefits are not reaching a majority of those who would benefit from them the most.

The targeting of financial incentives based on income, such as the CESG-A and CLB, is a welcome but decidedly modest addition to the federal SFA regime for low-income families. The largest beneficiaries of such savings programs are higher income families that are already in a better position to save and need less encouragement to do so, because at the level of the individual beneficiary those with the

Table 3-2. Cumulative Participation Rates of the Canada Education Savings Grant and Canada Learning Bond Programs

	2006 (%)	2007 (%)	2008 (%)	2009 (%)	2010 (%)	2011 (%)	2012 (%)
Nova Scotia							
CESG	30.5	32.9	33.6	34.9	36.6	37.4	38.8
CLB		6.6	9.7	12.5	15.5	17.6	19.1
Canada							
CESG	34.9	37.8	39.7	40.6	42.8	43.6	45.4
CLB		11.8	16.3	19.3	21.8	24.4	27.5

greatest capacity to save also receive the largest grants from the federal government (see Table 3-3).

- Families with sufficient disposable income to contribute $2,500 annually to an RESP can earn the maximum annual CESG-B benefit ($500) and thereby maximize their $7,200 CESG-B lifetime benefit in the child's 15th year.
- Meanwhile, low-income families are eligible for up to $2,000 through the CLB if they simply open an RESP and make no further contributions. By necessity, however, this also means that the beneficiary's parents must remain in the lowest income category over that entire period of 15 years. To maximize their CESG-B benefit and the low-income targeted CESG-A grants, $1,800 for each, those same families must then save at least $500 per year (or $9,000 over 18 years).

As a result of these policies, families with the knowledge and resources to make maximal RESP contributions receive $7,200 (+interest), while families with fewer discretionary dollars or without knowledge of the program receive much less. This point is underlined further by examining the federal budget expenditures for the CESG and CLB programs (Table 3-4a;b). In 2012, over 80% of combined budget expenditures were disbursed through the universal CESG-B program, with only the remaining 18% of funding targeted to the most needy (see 3-4a). Looking at the distribution of beneficiaries is even more instructive. Fully two-thirds of all program beneficiaries were only eligible for the universal CESG-B, meaning that they came from families with total incomes of at least $84,000 (the upper limit of middle income CESG-A eligibility). In contrast, low-income beneficiaries comprised only 14% of the total pool of beneficiaries.

Table 3-3. Maximum Benefit Schedules (Annual and Lifetime) for Canada Education Savings Grant and Canada Learning Bond Programs

YEAR	CESG-BASIC		CESG-B + CESG-A (LI)			CESG-B + CESG-A (MI)			CANADA LEARNING BOND	
	MAXIMUM RESP CONTRIBUTION SCENARIO, ANY INCOME		MAXIMUM CESG-A (LI); UNDER $43K ANNUALLY			MAXIMUM CESG-A (MI); $43-84K ANNUALLY			UNDER $25-43K (NCBS)	
	CONTRIBUTION	BENEFIT	CONTRIBUTION	CESG-B	CESG-A	CONTRIBUTION	CESG-B	CESG-A (MI)	CONTRIBUTION	CLB
0	2,500	500	500	100	100	500	100	50	none	500
1	2,500	500	500	100	100	500	100	50	none	100
2	2,500	500	500	100	100	500	100	50	none	100
3	2,500	500	500	100	100	500	100	50	none	100
4	2,500	500	500	100	100	500	100	50	none	100
5	2,500	500	500	100	100	500	100	50	none	100
6	2,500	500	500	100	100	500	100	50	none	100
7	2,500	500	500	100	100	500	100	50	none	100
8	2,500	500	500	100	100	500	100	50	none	100
9	2,500	500	500	100	100	500	100	50	none	100
10	2,500	500	500	100	100	500	100	50	none	100
11	2,500	500	500	100	100	500	100	50	none	100
12	2,500	500	500	100	100	500	100	50	none	100
13	2,500	500	500	100	100	500	100	50	none	100
14	2,500	200	500	100	100	500	100	50	none	100
15	2,500		500	100	100	500	100	50	none	100
16	2,500	Maximum benefit amount	500	100	100	500	100	50	-	
17	2,500		500	100	100	500	100	50	-	Maximum benefit
18	2,500		-	-	Maximum benefit	-	-	Maximum benefit	-	
19	2,500		-	-		-	-		-	
Total Benefit	**50,000**	**7,200**	**9,000**	**1,800**	**1,800**	**9,000**	**1,800**	**900**	**-**	**2,000**

CONCERN: The requirement to establish a Registered Education Savings Plan excludes most Nova Scotian families from receiving the universal benefits available through the Canada Learning Bond and Canada Education Savings Grant programs.

CONCERN: The largest beneficiaries of federal investments in Pre-Study Financial Assistance programs are higher income families.

In summary, the most recent CESG uptake and benefits data suggest not only that many eligible families are either unaware or uninterested in these programs (ESDC, 2013b), but also that the individuals that these programs benefit most are also those with the least financial need. These findings closely match those of previous studies of the CESG showing that most CESG program funds at that time went to higher income families (Milligan 2002; Usher 2004a; 2004b; Essaji and Neill, 2012). The findings also mirror the most undesirable and regressive features of most post-graduate tax measures discussed in Section 5.

Table 3-4a Canada Education Savings Grant and Canada Learning Bond Program Expenditures (2012)

	FEDERAL EXPENDITURE	SHARE OF EXPENDITURE	EXPENDITURE IN NS (SHARE)
CESG-Basic	$690m	82%	$12.6m (1.7%)
CESG-Additional	$51m	6%	
Canada Learning Bond	$99.4m	12%	$1.75m (1.76%)
TOTAL	**$840.4m**	**100%**	**$14.35m**

Table 3-4b. Canada Education Savings Grant and Canada Learning Bond Beneficiaries (2012)

PROGRAM	ELIGIBILITY	# OF BENEFICIARIES	% OF BENEFICIARIES
CESG-B	Universal	1.62m	67%
CESG-A (middle)	Middle	0.46m	19%
CESG-A (low) / CLB	Low Income (NCBS eligible)	0.34m	14%
		2.42m	100%

**CESG-B figure connotes individuals that received only this benefit. CESG-A figures connotes individuals with low or middle incomes that also qualified for CESG-B.*

4. In-Study Financial Assistance

The main in-study student financial assistance program available to Nova Scotia students has federal and provincial components. The federally funded portion, known as the Canada Student Loans Program (CSLP) falls under the mandate of Employment and Skills Development Canada (ESDC). The provincially funded portion, the Nova Scotia Student Assistance Program (NSSAP), operates within the Department of Labour and Advanced Education (LAE). The NSSAP in fact administers delivery of both programs.[15]

The CSLP and NSSAP were both created in 1964 to provide needs-based financial assistance to students who could not otherwise afford to participate in PSE (ESDC, 2013). These programs have always been based on the principle "that all academically qualified Nova Scotians have equity of access to quality PSE and training" (NSSAO, 2011). From the very beginning, however, the programs have been designed to supplement the financial resources that students (and/or their families) are expected to contribute. Thus, as a matter of longstanding policy, the programs are *explicitly not intended* to provide all of the money a student may need during their studies.

Unsurprisingly, the CSLP and NSSAP have gone through numerous changes since 1964, some of which bear mentioning here. For example, NSSAP only delivered a non-repayable bursary until 1992, when it was converted to a repayable loan program. This change came at the very beginning of a period of rapid growth in PSE participation and even faster growth in tuition fees. These factors combined to drive Nova Scotia's student debt levels higher than any other province by the mid-2000s (Statistics Canada, 2008), giving rise to Nova Scotia's reputation as "the least affordable jurisdiction [for PSE] in North America" (Usher and Steele, 2006).[16] Successive Provincial governments have implemented numerous initiatives to improve PSE affordability in response to this criticism (see Box A).

Given that a large number of changes have occurred over a short time period, it is presently difficult to accurately assess their full impact. Taken together, however, the changes have begun to remedy some of the deepest flaws in Nova Scotia's In-Study SFA regime. This will become clearer as the remainder of Section 4 reviews and analyses the main features of current In-Study SFA programs and policies.

15 In addition, Aboriginal Affairs and Northern Development Canada (AANDC) offers the Post Secondary Student Support Program (PSSSP) for registered First Nation individuals living on-reserve and Inuit individuals residing off-territory. Finally, the provincial government has a number of other financial aid programs targeted at specific vulnerable populations (e.g. social assistance recipients, children-in-care).

A full analysis of these more targeted programs is not within the purview of this report; these programs will be examined further in subsequent report(s) on the social determinants of PSE access.

16 In 2010, Premier Darrell Dexter and former LAE Minister Marilyn More described the NSSAP as among the worst in Canada (Government of Nova Scotia, 2010, Hoegg, 2010).

Box A. Recent Changes to Student Financial Assistance Policy and Program Delivery

The provincial government has implemented a large number of changes to the NSSAP over the past five years.

- In 2008, the province began lending directly to student loan borrowers in order to reduce borrowers' interest rates for NSSAP by 2.0%.
- Also in 2008, the Province re-introduced non-repayable student assistance and began issuing each borrower's provincial assistance using a 20/80 grant to loan ratio (i.e. 20% of provincial SFA issued up front as a non-repayable grant).
- In 2011-12, the maximum weekly assistance amount was increased by $10 (to $160), the up front grant to loan ratio was increased to 30/70; the annual allowance for books and supplies was increased by $500 (to $1,800), and the borrower's in study earnings exemption was doubled from $50 to $100 per study week. Also in 2011-12, a Debt Cap was introduced to limit the debt of undergraduate SFA borrowers during the first four years of study. Students graduating within four years have their outstanding NSSAP loan converted to a grant, leaving only the full four-year Canada Student Loan (CSL) amount – $28,560 – to be repaid.
- In 2012/13, the Province further increased weekly assistance to $170 per week and established a 35/65 grant to loan ratio.
- In 2013/14, the weekly assistance limit was raised to $180 per week and a 40/60 grant to loan ratio was implemented.
- In addition to the $22.6 million invested in SFA improvements since 2011, the Province has also invested in a large number of improvements to service delivery (e.g. improved online application and student web portal; electronic certification of enrolment, withdrawals, graduation; more automated processes introduced to reduce wait times including pre-study reports and student assessments) and outreach activities (e.g. redeveloped communications strategies and tools including the SFA website, presence on Facebook and Twitter, a guidance counsellor toolkit, informational videos and brochures, etc.).

Of course, in addition to the above, the Province has also introduced a number of measures to limit tuition costs of university students in Nova Scotia since 2005 (see *StudentsNS*, 2013a). These include:

- Three successive memoranda of understanding between government and the universities (2005, 2008, 2011) have capped tuition growth for Canadian students most programs at 3.9%, 0.0%, and 3.0%, respectively.
- In 2006-07, the Province implemented a one-time tuition reduction for Nova Scotia residents studying at Nova Scotia institutions ($440 for full-time students; $220 for part-time students).
- In 2008, the Nova Scotia Student Bursary (NSSB) was introduced to reduce tuition for all Nova Scotia residents by $761, $1,022, and $1,263 over the following three years. In 2010-11, a $261 Out-of-Province Student Bursary (OOPSB) was introduced to support other Canadian students studying in Nova Scotia.
- As of 2013-14, the NSSB and OOPSB are in effect but must be renewed annually.

4.1 Eligibility for In-Study Financial Assistance

When applying for government SFA, students submit a single application for both the CSLP and NSSAP, which is then evaluated by the Provincial administrators of the program, based on a large and complex series of eligibility criteria (NSSAO, 2011; ESDC, 2013).

A. BASIC ELIGIBILITY CRITERIA

Like most government programs, the CSLP and NSSAP set out basic eligibility criteria that applicants must meet to apply for and receive funding. To be considered eligible, applicants must meet certain criteria with respect to citizenship, residency in Nova Scotia, program and institutional eligibility, student category, and in some cases, basic financial eligibility (i.e. credit check). Applicants who receive funding must also meet certain requirements to be eligible for funding in subsequent years and/or programs of study. All of these criteria are summarized in Tables 4-1a and 4-1b.

The vast majority of the Basic Eligibility Criteria are fair and reasonable. In their totality, it is clear that these criteria are designed to be maximally inclusive to applicants facing a diversity of individual circumstances.

1. The citizenship criteria not only make provisions for Canadian citizens and permanent residents (likely to become citizens), but also to foreign students who have been granted official protected persons status (e.g. refugees). By definition, refugees are a particularly vulnerable population for whom access to education may be a critical step in building a new life in a new place.
2. The criteria for program of study are very flexible, accommodating a diversity of full-time programs:
   - With varying lengths (from training programs as short as 12 weeks to multi-year degrees);
   - Covering a large spectrum of academic disciplines and subjects; and
   - Serving students with different learning priorities (academic and/or career-oriented learning).
3. Likewise, the list of designated (or approved) institutions that students on government SFA may attend is long and diverse, comprising each of Nova Scotia's 10 universities, all 13 Nova Scotia Community College (NSCC) campuses, and dozens of PCCs), often with very particular areas of focus (e.g. cosmetology, human/health services, police sciences, etc.) (See Appendix A online for the full list of designated institutions in Nova Scotia).
4. While most students must study full-time to qualify for regular SFA, the definition of full-time studies is also quite reasonable (60% of a full course load or 20+ hours per week, depending on the program). Further to this, students with a permanent disability are considered full time if they maintain 40% of a full course load. Finally, a much more modest financial assistance program is available to part-time students through the federal government (see Box B below).
5. Government SFA programs also make provisions to fund students that extend their studies into the summer months and students engaged in co-op work terms. These provisions help to ensure that these particular students do not face unnecessary financial hardship as a result of their educational choices. Similarly, the Nova Scotia Residency requirements (Table 4-1b) make an interim allowance to continue funding students who move (or whose parents move) away from Nova Scotia during a funding year.
6. The policies for determining an applicant's student category (which relates to one's residency) are also flexible to a variety of personal circumstances (See Tables 4-1a and 4-1b). Flexibility in this criterion is particularly important because the student category relates directly to the calculation of resources available to a student and, by extension, to the level of funding a student may be eligible to receive. For example, a student without parents (for any number of possible reasons) qualifies as an independent student (without family resources to draw upon) while a single student with a child of their own qualifies as a Single Parent student (with additional recognized expenses to consider).
7. Finally, the requirements for maintaining continued SFA eligibility with respect to academic standards; number and type of SFA-fundable programs per borrower, and allowable program length are mostly reasonable (see below for exceptions).

In spite of these strengths, there are also some drawbacks to the Basic Eligibility Criteria. Most of these issues are subject to the existing appeals process (see Appeals; in Section 4.2). From an accessibility perspective, however, the most problematic issue is the limited SFA available to part-time students. The federal government does provide up to $10,000 per student in loans in addition to targeted grant programs for low-income/high needs part-time students (see Box B below). The provincial government has no such complementary programs. And while the federal program has recently improved substantially, the limited funding available to part-time students is a potential PSE access barrier to students for whom full-time studies are not an option (e.g. students in high cost, long-term programs, such as Dalhousie's part-time Law program, with a duration of seven years).

CONCERN: Limitations on funding for part-time students represent a potential barrier to students unable to study on a full-time basis.

Table 4-1a. Basic Eligibility Criteria for In Study Student Financial Assistance Applicants in Nova Scotia

CATEGORY	DESCRIPTION OF BASIC ELIGIBILITY CRITERIA			
Citizenship	Applicant must first meet basic CSLP eligibility. An applicant must either be a: • Canadian citizen as set out in the Citizenship Act; or • Permanent resident (landed immigrant) as in the Immigration Act; or • Protected Person (with appropriate documents) for entire study period.		All applicants must have a valid Social Insurance Number and documentation verifying status in one of these categories. Students who obtain citizenship, permanent residency, or protected person status during a school year become eligible to apply for student assistance for the next academic year.	

Program and Institution	Applicant must be registered as a full-time student at approved PSE institution (see Appendix 1), in a program leading to diploma, certificate or degree. To be considered a full-time student, applicant and program of study must meet a number of criteria (see right).		1. A full program of study must last at least 12 weeks of study within a total period of 15 weeks.
			2. Within a program of study, each study period must be 6-52 consecutive weeks in length.
			3. Must register in at least 60% of a full course load (FCL) at all times (except permanently disabled students).
			  1. University/college students: FCL is five half-courses per academic term (or 15 credit hours).
			  2. Private Career College students: FCL consists of 20+ hours of instruction per week. Minimum 60% load is calculated based on actual number of full-time hours in the student's program of study.	

Student Category and Residency	Placing applicant in the correct student category helps determine what financial information an applicant must provide and which specific policies must be applied to assess the application. Student category also determines whether applicant meets residency requirements to receive SFA in NS.		1. Single Dependent Student; 2. Single Independent Student; 3. Married or Common-Law Student; and 4. Single Parent Student	

Other Special Criteria	**Financial Assistance During Intersession**
	1. Students taking courses in May-June and/or July-August terms may be eligible for SFA.
	2. Course may be in-class, by distance, or both; and must occur entirely in May-Aug period.
	3. Full-time (in-class): minimum 12 wks, 1 full course (6 credits)
	4. Full-time (distance): minimum 12 wks, 2 full courses (12 credits)
	5. Students with active SFA application from last semester may request extension of funding.
		Co-op Programs
		There are specific provisions for SFA applicants that registered in co-op programs.
		1. August 1, 2011: after two semesters of study, co-op students in NS universities must submit a separate application for each subsequent semester.
		2. Can apply for SFA for co-op work terms of 12-17 weeks. Co-op earnings are considered when calculating in-study period resources.
		3. Semester directly after a paid co-op term: pre-study weeks not assessed on application for assistance.
			Credit Checks
			1. August 1999: all first-time NSSAP 22+ year old applicants subject to a credit check.
			2. SFA may be denied due to poor credit, if, in the three years before application:
			  1. Applicant was 90 days overdue, 3+ times, on 3+ loans or debts;
			  2. AND, above loans/debts worth $1,000 or more;
			  3. AND, applicant at fault for overdue payments.	

Maintaining Eligibility in Subsequent Years and/or Programs	**Academic Standards**
	Student must "satisfactory scholastic standard":
	1. University/NSCC students must pass 60% of FCL (18 credits);
	2. PCCs students must complete or advance in program;
	  1. 1st penalty: student on probation;
	  2. 2nd penalty: lose SFA for 12 months, remain on probation;
	  3. 3rd penalty: lose SFA for 36 months, remain on probation;
	  4. Further: same as 3rd, must maintain loan in good standing.
		Program Length
		1. Minimum number of program years plus one (e.g. 4+1=5).
		2. Program switch: lose extra year.
		3.Subsequent switch: regain extra year, minus years funded.
		4. Renewed eligibility for new program upon graduation.
			Number of Programs
			Lifetime SFA eligibility:
			1. 2 bachelor's, 1 diploma (or vice versa);
			2. 1 professional;
			3. 1 Master's, 1 Ph.D.;
			4. 1 qualifying year.
				Restrictions
				1. Past defaulters are normally restricted from SFA eligibility.
				2. NSSAP defaulters may remain eligible for CSLP.

Table 4-1b. Decision Matrix Summarizing the Criteria Required for Establishing Student Category and Residency Requirements.

This matrix outlines the process for determining an SFA applicant's student category. The applicant statements, (highlighted in yellow at left) are adapted from the questions on the SFA application. Applicants may be assigned to the appropriate student category based on their answers to these statements. Importantly, the student categories are mutually exclusive. To fit within any student category, the criteria highlighted in blue must exactly match the applicant's corresponding answers. The only exception to this rule is within the Single Independent Student Category (far right of matrix), in which an applicant can belong to this category if only one of the two statements marked *Yes* is true. Finally, for each student category, the corresponding criteria for establishing residency in Nova Scotia are in the very bottom row of the matrix (grey background).

THE APPLICANT ...	SINGLE DEPENDENT	SINGLE PARENT	MARRIED OR COMMON-LAW	SINGLE INDEPENDENT (2 POSSIBLE SCENARIOS)	
... Graduated high school less than four years ago.	Yes	Maybe	Maybe	Maybe	Maybe
... Has spent two periods of 12 consecutive months in the labour force or unemployed.	No	Maybe	Maybe	Maybe	Maybe
... Has no parent, guardian or other supporting relative.	No	-	-	Yes	Maybe
... Is a child in care of a government agency.	No	-	-	No	Yes
... Is the custodial parent of one child or more for at least 50% of the study period.	No	Yes	Maybe	No	No
... Is married or living in a common law relationship.	No	No	Yes	No	No
... Is widowed, separated or divorced and does not meet the criteria to be considered a single parent.	No	No	No	Maybe	Maybe

The student must have lived (or maintained a residence) in NS for 12 consecutive months before the first day of the current study period; ***OR***

If the student has moved outside NS, they must not have lived for 12 consecutive months in another province; ***OR***

For dependent students, the above must also apply to their parents.	Proved NS residency as dependent and has not since lived 12 months elsewhere.	The spouse meets above requirements; OR has worked in NS for the previous 12 months.	Student proved NS residency via ex-spouse and remained in NS when relationship ceased.

Legend

-	Question does not apply to this category.
Yes	If yes, this is the appropriate student category (in the absence of other exclusionary criteria).
No	If no, this is not the appropriate student category.
Maybe	May or may not apply to students in this category. Not an exclusionary criterion for this category.

Box B. Financial Assistance for Part-Time Students

SFA for part-time students is funded by the federal government and administered by the National Student Loans Service Centre (NSLSC), with applications processed by the Province (ESDC, 2013). There are two dedicated Canada Student Grants for PT students:

1. Canada Student Grant for Part-Time Studies: this grant is valued at $1,200 per year and is available to students from low-income families (see eligibility criteria in Appendix B online).
2. Canada Student Grant for Part-time Students with Dependants: this grant is valued at $40 per week of studies if you have 1-2 children under 12 years of age and $60 per week if you have three or more children.

In addition to the above, policy changes in January 2012 now provide the following additional benefits to Part-Time students:

1. The Government now pays the interest on part-time student loans while in-study.
2. The maximum total amount of part-time loans has increased to $10,000 (formerly $4,000). Students may borrow up to this amount for multiple programs but total outstanding debt may not exceed the $10,000 limit at any time.
3. Part-time students can now use these loans and grants to study outside of Canada.
4. Part-time students are now eligible for the Repayment Assistance Plan.

While it is important that SFA be available to students with a wide variety of educational interests and/or career goals, it is incumbent on government to ensure that the programs students are funded to attend represent good investments for the public and, even more importantly, for the student incurring debt. One way to proxy the strength of these investments is to assess students' ability to pay back the money that they borrow, based on the program and/or the institution they choose to attend.

For example, if we consider the three distinct groups of PSE students in Nova Scotia – public university students, public community college students, and PCC students – we see significant variability in their rates of student loan repayment (Table 4-2) (ESDC, 2013). This data shows that students from all three groups have become more reliable at paying their student loan debts over time (i.e. default rates are shrinking). Students enrolled in PCC programs, however, remain far more likely to default relative to students attending community college or university. These are damning statistics, especially because PCC programs tend to be vocationally oriented. If individuals are not earning sufficient incomes to afford their student loan payments after investing time and money in a vocational program, government arguably has a duty to protect itself and the students by withdrawing these institutions' student assistance designation or, at the very least, limiting new student assistance funding allocated to institutions with a strong record of repayment.

Table 4-2. Bulk Default Rate at Nova Scotia Post Secondary Institutions (by type)

	2004	2008	2012
PCC	63%	58%	39%
NSCC	38%	23%	21%
University	24%	15%	11%

B. FINANCIAL ELIGIBILITY CRITERIA: ALLOWABLE COSTS

Provided all of the Basic Eligibility Criteria are met, the applicant is then subject to a financial needs assessment process to determine whether s/he qualifies for assistance (NSSAO, 2011; ESDC, 2013). There four-step assessment process is carried out using information provided by applicants:

1. Identify the student's category (see Table 4-1b above);
2. Assess the student's allowable COSTS and their available financial RESOURCES; and
3. Determine the student's financial need

NEED = COSTS minus RESOURCES

The assessment of the applicant's expected costs takes into account a wide variety of possible costs that may be incurred by a student while studying. Broadly speaking, these costs may be grouped into four categories: Educational Costs, Living Costs, Other Transportation Costs, and Family-Related Costs (detailed in Table 4-3).

Depending on the particular item, the allowable cost used in the needs assessment may reflect the actual expected cost to the student (e.g. tuition and fees charged by their institution) or it may represent a universal assumption of expected costs (e.g. $1,500 per year for books and supplies + $300 for computer supplies).

As with the basic eligibility criteria, it is clear that the allowable costs criteria are designed to accommodate a wide variety of student circumstances beyond the cost of tuition and personal living costs. For example, policy makes specific provisions for student parents (e.g. dependent children allowance) as well as extended travel for students studying away from home. This degree of flexibility is appropriate and necessary for a program intended to encourage broad access to PSE.

Table 4-3. Summary of Allowable Costs Policies Used to Determine the Financial Need of In Study Student Financial Assistance Applicants

COST CATEGORY	ALLOWABLE COSTS		
Education Costs	**Tuition and Student Fees** 1. The actual cost of tuition charged by the student's university is used.	**Books and Supplies** i. $300 per course (6 credit hrs) ii. $300 computer costs $1,800 per academic year 1. Assumes full course load 2. Maximum $900 if study period less than 24 wks	**Other Educational Costs** 1. Spouse's required student loan payments. 2. Uninsured medical/dental costs for independent, married/common- law, single parent students or dependants from low-income family. 3. Parent's contribution if parent also attending PSE.
Living Costs	**Food, Shelter, Transportation, Miscellaneous.** Fixed weekly allowances for living costs depend on student category and local cost-of-living. 1. Dependent/Married Students – assessed living at home costs if the parents/spouse lives within commuting distance (25km) of school. 2. Independent students paying rent at home allowed additional costs up to the cost of living away. 3. Students living outside Canada are assessed NS living costs. 4. Student parents with less than 50% custody allowed living costs of student category. 5. Students studying by correspondence 1. Dependent/married students assessed living at home. 2. Independent/single parent students assessed the lesser living costs between province of study and province of residence.	**Additional Housing** (for married/common-law students only) Students unable to share residence of their partner are assessed a standard additional housing allowance. 1. Based on the province of study; equal to shelter allowance for a single student living away from home. 2. NS considered primary residence for students with two residences. 3. Students with two residences eligible for return transportation allowance.	
Transportation	**Extended Local** Dependent, independent and married/ common-law students living at home (>16km from school). 1. Per kilometer rate varies by province 2. Living costs plus extended local transport cannot exceed living away from home costs. 3. Single parents do not qualify.	**Return to Home** Dependent, independent or married students living away from parents/spouse allowed return travel costs. 1. One return trip from home for programs of less than 24 weeks ($600 maximum) 2. Two return trips for programs 24 weeks or more ($1,200 maximum) 3. Actual allowance based on province of study 1. NS ($100); NB &PEI ($300); Newfoundland & Labrador, Quebec, & Ontario ($600); Manitoba ($1,100); Alberta, Saskatchewan, & British Columbia ($1,200); Outside Canada ($1,200). 2. Correspondence – lesser of the cost from NS to province of residence/study	
Family-Related Costs	**Dependent Eligibility** Anyone Revenue Canada accepts as a dependant on tax return of: the student (single parent, married/common-law); or the parent (dependent students) 1. Less than 18 and dependent on the student/spouse/students' parents; 19+ years old studying full-time or living at home 51% of the time.		
	Dependent Allowance The allowance is based on the percentage of custody. 2. 75% plus – allow full costs 3. Under 75% – pro-rated	**Child Care** Allowed for children under 11 years if no parent at home (same 75% custody rules apply) 1. The greater of the amount requested or the maximum weekly child care rate is allowed.	**Child/Spousal Support** The expense is allowed for all students, if applicable. Students can self-declare the payment amount.

C. FINANCIAL ELIGIBILITY CRITERIA: STUDENT RESOURCES

The CSLP/NSSAP programs consider five possible sources of student income in applications for assistance (see below and Table 4-4 for additional detail).

1. *Pre-study Period Contribution:* this includes an expectation that the applicant is employed full-time at minimum wage for the length of the period preceding the commencement of studies (most often the summer months).
2. S*tudy Period Contribution:* this includes a large number of potential income sources in four different categories, which may or may not apply to any particular student. The value of the contribution could be as low as $0.
3. *Parental Contribution:* for dependent students only, a parental contribution is calculated based on total income, family size, and a moderate standard of living assumption (see Appendix B online).
4. *University Trust Fund:* if applicable, any funds held in trust for the student's education are also considered a resource to students. The value of this contribution could be also as low as $0.
5. *Spousal Contribution:* for married/common-law students only, the applicant's spouse is also expected to make pre-study and study period contributions based on the same criteria (with specific exceptions for student spouses and unemployed spouses).

In most of the cases above, SFA policy exempts some portion of income from the calculation of need (exemptions vary by income source, see Table 4-4).

D. FINANCIAL ELIGIBILITY CRITERIA: NEEDS CALCULATION AND COMPOSITION OF AWARDS

After the applicant's allowable costs and available resources are calculated, determining financial need is a straightforward operation:

NEED (federal) = ALLOWABLE COSTS *minus* AVAILABLE RESOURCES

Federal Awards

Once need has been determined, the next step is the evaluation of the applicant's eligibility for federal Canada Student Grants (CSGs). To be eligible for any of these grants, an applicant's assessed need must be at least $1. In the event that the total grant award exceeds the applicant's assessed need, eligible students still receive the full grant value(s). All of the available federal student assistance – including Canada Student Grants, their eligibility criteria, and their values – are summarized in Table 4-5. Graduate and professional students are currently ineligible for CSG low-income and middle-income grants.

It is important to note that some of these grants are mutually exclusive. For example:

- It is not possible to hold both a Low Income and Middle Income CSG because the income criteria are entirely different for the two groups (see Appendix B online).
- Similarly, a Middle Income Grant Recipient may not receive the Dependent Grant because it is only available to Low Income CSG recipients.
- Finally, eligible students can, in fact, hold up to three CSGs simultaneously. For example, a low income student with a child under 12 and a permanent disability would be entitled to three grants, at a total value of $5,600 per year. Incidentally, that same student can also make a separate application for up to $8,000 toward assistive services or technology (see Table 4-5).

If the awarded grants meet or exceed an applicant's assessed need, no further federal awards are calculated. However, if a student has additional need not covered by their grants, a CSL award will be calculated to supplement the grants, up to a maximum value of $210 per week. Based on this, the maximum CSL award for the typical undergraduate student studying for 8 months (34 weeks) is $7,140.[17]

Provincial Awards

When an applicant's eligibility for provincial assistance is evaluated, the calculation of need is modified slightly for dependent student applicants. In these cases, the applicant's parental contribution is reduced by 25% of its calculated value (see Table 3-3). This results in dependent students having access to slightly more provincial student assistance.

NEED (provincial) = ALLOWABLE COSTS *minus* [AVAILABLE RESOURCES *less* 25% of PARENTS' CONTRIBUTION]

If the student's remaining need (after the 25% parental contribution reduction) exceeds the already awarded federal grants and loans, Nova Scotia funding is awarded as summarized in Table 4-6.

As was the case with Canada Student Loans, the minimum amount of provincial assistance that can be issued is $100. Thus, if a student's total remaining need is less than $100, no further assistance will be issued. It is also worth noting that any provincial assistance awarded based on initial assessment is subject to change upon completion of the student's Pre-Study Report (PSR). The PSR must be submitted after the study period begins and its purpose is to give the student an opportunity to update their application for assistance based on any new information about their pre-study income and/or expenses. Students are entitled to receive a reassessment of their pre-study contribution if they can demonstrate any changes

17 As with the CSGs, the minimum amount student loan that may be issues is $100; in this case, if a student's remaining need does not exceed this threshold, no student loan award is issued.

Table 4-4. Summary of Policies for Determining the Available Resources of In Study Student Financial Assistance Applicants.

INCOME SOURCE

Pre-study Contribution

Students (and their spouse, if applicable) are expected to work FT during pre-study period (PSP) to save for their studies. Initial minimum contribution is based on student category, minimum wage and FT hours of work. If spouse is a FT student, half the minimum contribution is assessed.

The PSP is the number of weeks the student was not a FT student prior to beginning classes (maximum 18 weeks). Typical PSPs are:

1. 8 weeks – for high school student with June graduation;
2. 18 weeks – for university students between years;
3. 13 wks – for NSCC student in 39 wk program (May to Sept)

Until a PSP is processed, student and spousal contributions:

4. Based on NS tax and cost of living rates (adjusted to away rates later);
5. If gross PSP income (excluding CPP benefits) less than min. wage, min. wage (plus any CPP Benefits) is used.
6. Allowable expenses include only NS living costs and child costs
7. Actual contributions adjusted based on pre-study report.

Study Period Contribution

The study period contribution is based on the student's and if applicable, the spouse's income during the study period. Student income is grouped in 4 distinct categories. The total net contribution from each pot plus a spouse's contribution, if applicable, equals the study period contribution.

Category 1
Sources: PT earnings, CPP Benefits, non-education EI, other.

1. Gross income less income tax and $100 exemption for each study week.

Category 2
Sources: Investments (stocks, bonds, GIC, savings), 80% of post-tax income
$2,000 RRSP exemption for each year since high school (on request)

Category 3
Sources: Educational allowances (e.g. EI for education, Native Council awards, Provincial/Municipal assistance; trusts, RESPs, scholarships).

1. 100% of income after taxes
2. For dependent students, parental contribution reduced by trust, RESP amount (no income tax assessed).

Category 4
Sources: Scholarships or bursaries.

1. Deduct taxes and $1800 exemption for study period > 24 wks.
2. For study period < 24 wks, deduct $900.

Spouse's contribution

3. If FT student, apply categories 1-4; assessed at half of contribution.
4. If not FT student, min. contrib. assessed (unless spouse income is greater min. wage).
5. No min. contrib.. if spouse unable to work; 70% of actual net income is used instead.

Parental Contribution

1. Parents expected to contribute to the child's education based on portion of discretionary income after taxes, CPP, EI, a moderate standard of living (MSOL) and other tax claimable expenses (i.e., employment, medical, alimony, parents tuition, split pension deduction, RRSP roll-overs).
2. Parents provide previous year's tax return information. Parents are not liable for loan repayment.

Family consists of parents, applicant, and other dependents (defined as):

1. All children under 19, dependent students over 19, disabled children over 19 and living at home, any elderly relatives/foster children.
2. Dependent relatives not included in family size to determine low- or middle-income status for Canada Student Grants.
3. All dependants included in family size to determine MSOL allowance.

Moderate Standard of Living Costs based on family size (see Appendix B):

4. Weekly family contribution is divided by the number of dependents attending PSE multiplied by number of weeks in the study period; if student receives funds from a scholarship trust fund or RESP, the amount is deducted from family contribution.
5. Family Contribution for NSSAP — 25% of the family contribution is added to the student's calculated need (reduction calculated before trust fund/RESP is deducted.

Table 4-5. Student Financial Assistance Available from the Federal Canada Student Loans Program (CSLP).

FEDERAL FUNDING	
CSG for Students from Low-Income Families (CSG-LI)	Family's previous year income (from Income Tax Return) must be below low-income threshold (see Appendix B-1). Grant value of $58.14/week, $250/month, or $2,000/year (program length dependent). Total grant may exceed need.
CSG for Students from Middle-Income Families (CSG-MI)	Family's previous year income (from Income Tax Return) must be below middle-income threshold (see Appendix B-2). Grant value of $23.26/week, $100/month, or $800/year (program length dependent). Total grant may exceed need.
CSG for Students with Dependents (CSG-D)	Responsible for care of any child under 12 and/or a child over 12 with a disability. Family income must be below low-income threshold. Grant value of $46.51/week, $200/month or $1,600/year (program length dependent). Grant may exceed need.
CSG for Students with Permanent Disabilities (CSG-PD)	Student must have a permanent disability (as defined by CSLP policy). Maximum value of $2,000 per year. Grant may exceed need.
CSG for Services and Equipment for Students w/ Permanent Disabilities (CSG-SEPD)	Student must have a permanent disability (as defined under the CSLP). Grant assists students with adaptive equipment and services while attending post- secondary programs; requires a separate application confirming the student's need for the goods and/or services as well as the associated costs. Maximum value of $8,000 per year.
CSG for Part-Time Studies CSG for PT Students w/ Dependents	Part-Time Studies grant offers $1,200 per year for students from low-income families. PT Students w/ Dependants grant offers $40/study week for 1-2 children under 12; $60/study week for 3+ children under 12.
Canada Student Loan	If student is eligible for CSLP, their maximum assistance is $210 per week of study.

Table 4-6. Student Financial Assistance Available from the Provincial Nova Scotia Student Assistance Program (NSSAP)

PROVINCIAL FUNDING		
NS Student Loan and Grant (NSSL/G)	Students eligible for NSSAP (based on calculated need), can receive up to $180/week of study ($6,120/34 week study period), with 40% of award issued as an up-front, non-repayable grant (maximum $2,448) and the remaining 60% as a loan ($3,672).	
NS Grant for Students with Dependants (NS-Dep)	Student must be a high-need student with dependants (need > $275 per study wk; maximum grant $20/week ($680/34 week study period)	
NS Supplemental Loan (NS-Sup)	Student must be enrolled in Medicine (MD), Law (LLB) or Dentistry (DDS). Maximum supplement is $140/week ($4,760. Supplemental loan need is calculated after NSSL/G and NS-DG.	
Canada/NS Access Grant (Can/NS-AG) — Funding through the Canada-Nova Scotia Access Trust	Student must be: (1) in receipt of, or entitled to receive, a NSSL/G; (2) a dependent student; (3) enrolled full-time at an eligible post-secondary institution; (4) pursuing undergraduate studies toward a degree, certificate or diploma with program length of 2+ years and study period of 24+ weeks; (5) assessed with a parental contribution of less than $1,000; (6) in year 2, 3 or 4 of a program for academic years 2007/08 and 2008/09 AND in year 1, 2, 3 or 4 for academic years 2009/10, 2010/11, 2011/12, 2012/13. Student must submit a pre-study report to be eligible;	Unmet Need Less than $100 • Award -$0 $101 and greater • Award -up to $2,000
Nova Scotia Provincial Access Grant (NS-PAG)	Eligibility assessed by Post-Secondary Disability Services (PSDS, within Department of LAE). Student's pre-study report must be processed and indicated at least $1 of need. University maximum grant - $2,000; NSCC/PCC maximum grant - $1,000. Grant applied to student loan debt unless student has unmet need.	
Nova Scotia PSDS Goods & Services Program (NS-PSDS)	Students who do not qualify for CSL/NSSAP may be eligible for assistance for goods and services through this program. Students must complete an application (link) to PSDS office.	

to their employment income earned during the PSR period, that they have been unable to work due to illness, or that they have been unable to find work.

E. DISBURSEMENT OF FUNDS

Before any funds are disbursed, the student must negotiate the terms of the grants and loans they are eligible to receive with the appropriate lender(s) (the Governments of Canada and/or Nova Scotia). The CSLP and NSSAP issue standard documents, which must be signed by the student, the government, and the appropriate institutional representatives.

After the study period has begun and the award terms have been negotiated, the typical university student receives their funding in two instalments, most often in September and January. Any federal grants are split between the two instalments. As described above, the second instalment is subject to completion of the Pre-Study Report, which confirms the borrower's income and costs during the pre-study period. For students in shorter programs (less than 23 weeks), federal grants are disbursed in a lump sum at the beginning of the term.

4.2. Other In-Study Student Aid Policies

There are a number of other in-study SFA policies that bear brief mentioning here (NSSAO, 2011; ESDC, 2013).

A. REQUESTING A REASSESSMENT

If a student believes that their financial assessment does not accurately reflect their actual expected costs or available resources, they may request a reassessment of their finances based on new or more accurate information. In all cases, documentation of the student's updated financial status must be provided. There are a number of possible grounds for reassessment described below.

1. Change in Parental Income

For single dependent students, an unexpected reduction in parental income can reduce the amount of money available for their education. This is because applications are processed using personal income tax information from the previous year. In such instances, a student may request a reassessment of their need based on new income information. If the student is found to have more need, it may increase the amount of money awarded but it does not change eligibility for Canada Student Grants, which are always based on the previous year's tax assessment.

2. Change in Student Resources

If a student's resources are unexpectedly reduced after the study period begins, this may also provide grounds for a reassessment. Examples of this could include reduced employment earnings (for the student or, if applicable, their spouse), loss of a scholarship, or reduced investment value (e.g. RESP). In addition to any resource reductions, students are also expected to report any unexpected increases to their resources.

3. Change in Student Costs
Unexpected changes in a student's costs may also provide reasonable cause for reassessment. Examples of such costs include: uninsured medical/dental costs, changes in accommodations (and/or student category), registering for additional courses within the program of study, and making spousal student loan payments.

It is important to note that students applying for reassessment based on new information may also be subject to an over-award (i.e. an award in excess of the applicant's calculated need). Over-awards exceeding $1,000 ($500 for programs under 24 weeks) are deducted from the assessment of future provincial awards (if applicable). Over-awards below these thresholds are waived (i.e. capitalized into the borrower's provincial loan principal) and do not affect future awards.

B. WITHDRAWALS

As described earlier, most students on government SFA are expected to maintain full-time student status. Students who withdraw from a program (or period of study) before the end date or reduce their course load below the applicable minimum threshold may become subject to the following consequences:

- An over-award;
- Cancellation of any awards not already disbursed;
- Conversion of awards already disbursed to loans; and/or
- A determination that the student has failed to meet the satisfactory scholastic standard (and subsequent SFA probation and/or suspension)(see Maintaining Eligibility; Table 4-1).

The consequences are largely based on the timing of the student's withdrawal. The student is typically not penalized for the portion of the study period that they continued to study full time. Thus, the proportion of SFA funding that may be converted to loan is roughly equivalent to the time remaining in the study period. The Nova Scotia Student Grant, Nova Scotia Dependent Grant, and Nova Scotia Supplemental Grant are all subject to this rule, but the Canada Student Grants are typically converted to loans only if the withdrawal happens within 30 days of the study period start date.

C. APPEALS

The CSLP/NSSAP also administers an appeal process for students facing extraordinary circumstances not covered or accommodated within standard program policies. This process promotes the financial accessibility and overall fairness of the system by giving such students a formal opportunity to receive additional consideration for their unique circumstances. There are possible levels to the appeals process:

1. The Lower Appeal Board (LAB), comprised of SFA counsellors and the Manager of SFA Programs; and
2. The Student Aid Appeal Committee (or Higher Appeal Board – HAB), comprised of Ministerial appointees that receive a per diem for their service.

If the student making the appeal is unhappy with the decision of the LAB s/he is entitled to present the appeal to the HAB. This Board may either confirm the previous SFA award or recommend that the Minister authorize a change to the student's award. In addition, the HAB may issue up to $3,333 in discretionary funding to any applicant, when deemed appropriate based on the facts presented to the Board and current SFA policy.

There are many possible grounds for appeal of an SFA decision. In each case, students are encouraged to provide all relevant documentation that will help to establish that their situation is worthy of special funding consideration. There are some SFA policies that are not subject to student appeal, such as the maximum weekly loan amount ($180), the maximum values of grants, and the maximum lifetime limits on SFA. Some of the more common appeals heard by the LAB and/or HAB are described briefly below.

1. Basic eligibility criteria: the student may wish to appeal a suspension (failure to maintain a satisfactory scholastic standard); to seek an extension to their program length; to seek special approval to seek a third undergraduate degree or diploma; or to have a failed credit check waived.
2. Family financial contribution: the student may appeal based on issues such as extraordinary family expenses (e.g. legal, medical, funeral, essential home repairs, etc.); high parental debt/bankruptcy; family breakdown resulting in a change of student status; or high living costs.
3. Over-awards: students assessed with over-awards may receive special consideration if, for example, the over-award is the result of a withdrawal due to illness; or if reclaiming an over-award would place the student in immediate financial hardship.
4. Other appealable issues: these might include a change of student category during a study period (e.g. a student becomes married or divorced); the reconsideration of allowable costs or expected spousal income of a married student; or extending a deadline for SFA application.

Based on the above, it should be clear that most issues related to the assessment and awarding of SFA are subject to student appeal. While there is no explicit guarantee that a student's appeal will be approved, the existence of an appeals process that gives extra consideration to student's facing personal and/or financial hardship is an undeniable strength of the government SFA regime.

In spite of these strengths, there are a number of justifiable critiques of the current appeals process.

- First, the program is poorly advertised to students facing financial or other hardships affecting their eligibility for SFA.
- Secondly, though the existing process is permissive to a wide variety of appealable issues, it can be an invasive and emotionally challenging process for appellants, often requiring them to share private details of their lives with a panel of complete strangers. This critique is particularly relevant to individuals appealing based on serious health problems, who are being subjected to a potentially highly stressful atmosphere.
- Finally, since the HAB currently meets only in Halifax, it is less accessible to individuals residing outside of the City and therefore may cause an additional hardship to such individuals.

CONCERN: The student assistance appeals process is inadequately advertised and therefore, poorly understood, by many individuals that could benefit from engaging in this process.

CONCERN: The students assistance appeals process can be an invasive and emotionally challenging experience that may be unhealthy for individuals with health-related grounds for appeal.

4.3. Accessibility Impact of In-Study SFA Programs

Based on the policies governing In-Study SFA described above, *StudentsNS* has identified a number of concerning issues worthy of further attention.

A. CALCULATING STUDENT RESOURCES AND ALLOWABLE COSTS

The most problematic government SFA policies from a student perspective are those that specify the resource contributions expected of SFA applicants. For any particular source of funds, the key question is whether or not the expected resource contribution is reasonable under the applicant's circumstances? In some cases, the clear answer is 'no.'

Parental Resources (Dependent Students)

To determine the expected parental contribution, the CSLP applies a moderate standard of living (MSOL) assumption to the parents' after tax income. The NSSAP uses the same basic formula but also reduces the parental contribution by an additional 25% when calculating eligibility for provincial assistance.

On its surface, the MSOL assumption appears relatively generous to most families. For example, comparison with Statistic's Canada's Market Basket Measure (MBM)[18] of basic living costs shows that the MSOL exceeds MBM by between $12,000 and $21,000 for families ranging in size from two to 10 (Table 4-7) (Statistics Canada, 2013-Table 202-0809). Thus, it is fair to conclude that MSOL is, at the very least, generous relative to the most basic standard of living.

As a next step, we can then compare the MSOL assumption to actual after tax income data of the Nova Scotian population (Nova Scotian families of two or more; divided by quartile) (Table 4-8a). Table 4-8b shows the impact of parental contribution policy on Nova Scotian families at the upper limit of each income quartile. Moving from top to bottom, if we sequentially subtract the MSOL and the Parental Contribution (PC) from our Income Assumptions (IA), we are left with the parents' Surplus Income (SI). This exercise shows us that a small number of family types are left financially vulnerable under this scenario (i.e. they have fewer than $10,000 left to cover unexpected or extraordinary expenses, highlighted in yellow).

Table 4-8a. Standard-of-Living Analysis Part 1: Income and Deduction Assumptions

INCOME QUARTILE	UPPER LIMIT (IA)	RETIREMENT	RESP
1st quartile	37,400	1,992	2,500
2nd quartile	53,100	5,572	2,500
3rd quartile	71,500	8,109	2,500
4th quartile	92,700	11,526	2,500
5th quartile	92,700+ (119,800)	17,997	2,500

Finally, to truly demonstrate the impact of the parental contribution policies, we then consider the impact of families that make contributions to other reasonable savings priorities (i.e. retirement savings and education savings for other children).

- To estimate retirement savings for each income assumption, we use the average combined value of retirement contributions made by Nova Scotians in a similar income range, as reported in 2009 federal income tax returns (i.e. Retirement contributions = registered pension plan (RPP) contributions plus registered retirement savings plan (RRSP) contributions) (Canada Revenue Agency, 2011).

18 The MBM "is based on the cost of a specific basket of goods and services representing a modest, basic standard of living. It includes the costs of food, clothing, footwear, transportation, shelter and other expenses for a reference family of two adults aged 25 to 49 and two children (aged 9 and 13)" (Statistics Canada, 2013-Table 202-0809).

- To estimate education savings for other children, we assign an annual RESP contribution of $2,500 for each additional child (the amount required to maximize CESG benefits). This is an overestimate compared with actual RESP-buying behaviour of Nova Scotians (see Appendix C) but it is also an investment that government encourages all parents to make and is, therefore, entirely reasonable.
- Though they are not included in this analysis, some families might also make contributions to a Registered Disability Savings Plan (RDSP) for a family member – often a child, but possibly a parent or other dependent person – with "a severe and prolonged impairment in physical or mental functions." (Canada Revenue Agency, 2013c).

After subtracting these amounts from the parents' Surplus Income (see 4-8b), we now observe many more family types that are financially vulnerable (with incomes under $10,000 or with negative incomes). While this is a simplified model, it reflects an important reality: that many Canadian parents are taking on additional debt and choosing to delay retirement to pay for the PSE of their children (Canadian Press, 2013). Taken together, these findings help to at least partially explain previous findings that parental contribution formulae in Canadian SFA policy tend to overestimate contributions of higher income parents (and also tend to underestimate the contributions of middle-income families) (Hemingway 2003). Based on the above, this policy withholds assistance from students whose parents either cannot or will not make the expected contribution indicated by the family's income.

CONCERN: The moderate standard of living assumption overestimates the parental contribution of some parents of dependent students.

All of this raises fundamental questions about whether SFA regimes should, as a matter of policy, force parents to choose between their own future economic security and the ability of their children to pay for an education. It is equally important to consider whether parents should be forced to discriminate between their children when investing in education. For the record, *StudentsNS* believes it is neither fair nor appropriate to force such decisions on parents.

CONCERN: The moderate standard of living assumption fails to consider important family financial priorities including parental retirement savings, registered education savings for other children, and registered disability savings for any family member.

Personal Resources

As described above, SFA policy assumes that students will contribute a significant share of their own financial resources to funding their education. This applies to both pre-study and in-study financial resources and, if applicable, also applies to the resources of a student's spouse or common-law partner here (NS Student Assistance Office, 2011; ESDC, 2013). With respect to the student's own resources, the expectations are generally reasonable.

Pre-Study Contributions

For example, the 'typical undergraduate'[19] applicant's pre-study contribution is initially based upon minimum wage earnings and 18 weeks of full-time hours during the summer months (minus taxes and a basic living cost allowance). For 2013-14, this equates to an expected pre-study contribution of $3,179,[20] which is used to assess the applicant's initial eligibility for SFA. And while we believe this to be a reasonable set of assumptions, the minimum contribution is also re-assessed once the applicant's pre-study report has been submitted. Based on actual income earned, this contribution may be adjusted in either direction. This is an important program element, especially in a sluggish economy where students find it difficult to find stable pre-study employment.

In-Study Contributions

Student contributions during the study period are also quite reasonable. Students are not expected to work but are entitled to a $100 weekly exemption if they choose to do so. The various exemptions built into other income categories are also appropriate (see Table 4-4). In particular, the reduction of the parental contribution by any RESP or educational trust amounts withdrawn on behalf of the applicant is an important acknowledgement for parents who invest early in their child's education. Though, as we point out above, similar allowances for ongoing educational investments on behalf of other children are no less important.

The $2,000 exemption on investment in RRSPs for each year since completion of high school is an equally important recognition that, in spite of their current student status, SFA applicants have multiple life-course needs and financial priorities. Of course, mature students and those seeking graduate or professional credentials are more likely to have RRSPs and other investments to draw upon. This point is particularly important because of the changing enrolment

19 The 'typical undergraduate is one who is in the single dependent student category and is living at home during the summer.

20 Pre Study Contribution equals: gross earnings [18 29.6 hour weeks @ $10.15 per hour = $5,409 (less 7.6% taxes)] minus the living allowance [18 weeks at $101 = $1,818].

landscape in Nova Scotia: as the 18-24 year old population continues to decline, older students may become increasingly important within Nova Scotia's PSE population. Already, graduate students are the fastest growing segment of Nova Scotia's domestic student population (MPHEC, 2013b). SFA policies must continually adapt to reflect the needs of a changing student population.

Moving forward, we question whether Nova Scotia should force any student to withdraw from an existing RRSP to fund their education. Just as we believe that parents should be entitled to save for their own retirements without hurting their child's SFA eligibility, so too should students (and/or their spouses) be able to do so. In a similar fashion, students with children should be empowered to take advantage of education savings programs for their own children without limiting their own access to PSE in the present. *StudentsNS* opposes any policy that forces loan applicants to heavily discount their current or future wellbeing (or that of their children) to pursue education.

Married Student Contributions

The basic fairness that is so obvious throughout much of our SFA policy breaks down substantively for married (or common-law) students, with the most negative impacts felt by students with a non-student spouse.[21] This inequity is rooted in the assumption that a married couple that includes a student should expect to live below a moderate standard of living (as defined by the CSLP itself). The stark difference between married student living allowances and the MSOL as applied to parents of dependent students is illustrated in Table 4-9. Couples without children are allowed $16,000 less than the MSOL, while couples with one to three children are expected to live more than $20,000 beneath the MSOL level.

CONCERN: Married couples containing at least one person on student financial assistance are expected to live well below a moderate standard of living, as defined by the Canada Student Loans Program.

As a consequence of this differential standard of living, a student's spouse is expected to make a much larger contribution than would a parent with a similar level of income. To illustrate this, Table 4-9c models the expected contributions of two different two-person families with the same after-tax income (ATI).

21 For two married students, allowable costs and expected resources are split equally between the two students in assessing any application for assistance (by either student). These students are also at an economic disadvantage, relative to other non-married applicants, but less dramatically so than their counterparts with only one student in the marriage.

Table 4-9a. Student Living Allowance by Student Category (2013-14)

	AMOUNT ($)
Single Student Away from Home	11,652
Single Parent (without dependent)	15,420
Married Student & Spouse (no dependent)	23,328
Each Dependent Person	6,024
Single Student Living at Home	5,424

Table 4-9b. Standard-of-Living Comparison of Married and Dependent Student Families, by Size

STANDARD OF LIVING ALLOWANCE	FAMILY SIZE 2	3	4	5	6
MSOL (for parental contributions)	39,761	49,476	56,365	61,711	66,080
Married Student Allowance	23,328	29,352	35,376	41,400	47,424
DIFFERENCE	**16,433**	**20,124**	**20,989**	**20,311**	**18,656**

Table 4-9c. Standard-of-living comparison of a dependent student family model and a married student student family model.

A. 2 PERSON FAMILY (PARENT + CHILD IN UNIVERSITY) WITH AN AFTER TAX FAMILY INCOME OF $53,100 (UPPER LIMIT OF NS SECOND INCOME QUARTILE)		
After tax income	53,100	
subtract MSOL	39,761	75%
Disposable Income	13,339	
subtract 34 week PC	1515	3%
FINAL REMAINDER	11284	

B. 2 PERSON FAMILY (UNIVERSITY STUDENT + WORKING SPOUSE) WITH AN AFTER TAX FAMILY INCOME OF $53,100 (UPPER LIMIT OF NS SECOND INCOME QUARTILE)		
After tax income	53,100	100%
subtract living allowance	23,328	44%
Disposable Income	29,772	
subtract Family Contribution	10,948	21%
Income after minimum FC	18,824	
Additional Contribution	13176.8	25%
FINAL REMAINDER	5,647	

- The first family, comprised of a single parent and a university student, is allowed 75% (nearly $40,000) of ATI for living expenses (MSOL), with the remaining $14,000 subject to the parental contribution formula (see Appendix). When the formula is applied, the single parent is expected to contribute a mere 3% of the family's ATI.
- The other family, comprised of a student with a non-student spouse, is allowed only 44% of ATI for their living allowance, with the remaining $30,000 subject to the spousal contribution formula (70% of income in excess of the minimum contribution). The minimum contribution (pre-study and in-study combined) for this couple is nearly $11,000 (or 21% of ATI) with an additional contribution of over $13,000 bringing the total to over 45% of ATI. Finally, even at a sub-moderate living standard, this couple retains less than $6,000 of ATI for savings and/or extraordinary circumstances.

CONCERN: For married student financial assistance applicants, the financial contributions expected of a student's spouse are unrealistically large.

CONCERN: The student contribution assumptions fail to consider potentially important financial priorities including personal (and/or spousal) retirement savings, registered education savings for dependent children, and registered disability savings for any family member.

Given the single example above, it is not surprising that Higher Appeals Board members report that married students are currently among the most frequent appellants of SFA decisions. Nor is it surprising to hear anecdotes about student couples choosing to delay marriage or cohabitation to maintain their eligibility for student assistance. Based on all of the above, it is clear to *StudentsNS* that SFA policy is leaving married students extremely vulnerable by expecting far too large a spousal contribution.

Allowable Costs

The vast majority of allowable costs are reasonable and in some cases, quite generous. For example, recent increases to the book allowance results in each applicant receiving an allowable cost of $300 per 6-credit course (or $1,500 per 34-week study period) plus an additional $300 toward the costs of other educational supplies (e.g. computer, software, etc.). Other policies that give special cost consideration to a range of individual financial barriers to PSE access are also viewed very positively. Examples of such policies include those that: conditionally allow married students to claim the cost of additional housing; allow minimal travel costs for returning home or extended local travel; and recognize the costs associated with caring for dependent children.

On its surface, the allowance of full tuition costs for each student might also be considered a strong feature of the existing policy. This is arguably true, but only to the extent that attending a higher cost institution and/or program will improve an applicant's chances of being found in need of financial assistance. Based on individual circumstances, this could be the difference between receiving and not receiving a particular grant (i.e. $1 of need is enough to be considered eligible for CESGs).

On another level, however, this policy is highly inequitable to students with higher tuition costs. As an example, consider two low-income, high need undergraduate students attending two different rural universities in the same part of the Province, Acadia and Université Sainte Anne, in 2012-13. Tuition costs for these two students were $7,058 and $6,000, respectively, for a total difference of $1,058. Each student qualifies for CESG-Low Income ($2,000), a maximum federal student loan ($7,140), and maximum provincial student assistance ($6,120), for a grand total of $15,260. But since the Acadia student must spend $1,058 more on tuition, that student has considerably less money to cover all other education and living expenses.

B. CALCULATING NEED AND ASSISTANCE LEVELS

It is important to all students that the various components of student resources and allowable costs policies reflect students' economic realities as closely as possible. But for students with the most financial need, these issues are actually less important than the policies setting the maximum levels of assistance available to them. As described above, the existing SFA programs are not designed to help students cover all of their educational and living costs. As a result, each year a certain number of students are left with some "unmet need" after their applications have been fully assessed. Previous research has estimated that at least 25% of Canadian students have financial needs beyond those assessed by SFA programs (Hemingway, 2003). Despite being a decade old, these studies are relevant here because they argued, at the time, that maximum assistance should be increased to at least $350 per week (equivalent to approximately $430 in current dollars), which exceeds the maximum assistance currently available to most students ($390 per week, excluding CESGs).

Not surprisingly, many students turn to other sources of funds, including expensive private debt, to increase their available resources (Junor and Usher, 2002; CUSC, 2012).

This has the dual effect of making PSE even more costly (i.e. less affordable). Students without sufficient leverage to secure private loans face an access challenge that may be insurmountable.

CONCERN: The maximum assistance amount is inequitable to students with the greatest financial need.

It is a common misconception that it is primarily students from more expensive professional programs (e.g. medicine, dentistry, law) who must turn to private loans. NSSAP statistics suggest this is unlikely to be the case. Of the 1,465 Nova Scotia university student SFA applicants left with unmet need in 2011-12, the vast majority (77%) were actually undergraduate students, with average unmet need of $2,049. Professional students and graduate students had significantly higher average levels of unmet need ($5,132 and $4,437 respectively), but represented much smaller shares (14% and 9% respectively) of the underserved population (NS Student Assistance Office, 2013).

Of course, the larger amount of unmet need for professional and graduate students is a potential barrier in itself, making it that much harder for low and middle-income students to gain access to these programs. There is some evidence to suggest that access to high cost programs is most difficult for middle class students, who may not qualify for enough government SFA to cover their costs and, at the same time, also have few need-based bursaries available to them through other sources (OUSA, 2010).

PRINCIPLE: Any increase in costs must be matched by available assistance; otherwise, accessibility for the most needy students will be diminished).

Who Benefits from In-Study SFA?

We can start to answer this question by examining the income characteristics of Nova Scotia's In-Study SFA borrowers. Focusing only on Nova Scotia residents studying at Nova Scotia PSE institutions, Table 4-10 shows the number of these students meeting the income eligibility criteria for certain loans and grants; it also indicates the share of this population that qualifies. For example, we can see that a total of 16,546 PSE students are eligible for a Canada Student Loan, representing 45% of all Nova Scotia residents studying at any one of Nova Scotia's universities, NSCC campuses, or PCCs. Importantly, the number of CSL recipients is also a useful proxy for the total number of Nova Scotia resident students receiving In-Study SFA of any type.[22]

In a similar fashion, the total number of NSSAP recipients is useful for measuring the magnitude of the assessed need across the population of borrowers. This is because an applicant must first be eligible for a maximum CSL ($7,120 plus any relevant student grants) to even qualify for provincial assistance. This data indicates that a clear majority of all borrowing PSE students (63%) have at least this much need. We can learn even more about the income characteristics of SFA recipients by focusing on those that qualify for CSG.

Recipients of the CSG-Low Income grant, for example, must occupy a narrow income range between approximately $20,000 and $54,000 (gross income). At all family sizes (1 to 7 or more), this level of income is very close to the MBM measure of the most basic living costs (see Table 4-5). Based on grants awarded, less than one fifth of Nova Scotia resident students (and just over two fifths of SFA users) come from low-income families.

Likewise, recipients of the CSG-Middle Income grant (10% of Nova Scotia PSE students; 21% of SFA users) also occupy a specific income range from approximately $37,000 to $92,000 per year. For all family sizes, this level of income exceeds the aforementioned Moderate Standard of Living (MSOL) assumption and may, therefore, be considered relatively generous in its targeting of higher income individuals. Unfortunately, at a total of $800 annually, this grant is not nearly sufficient relative to the large income deficits felt by individuals making average education and retirement savings (Table 4-8b). Nevertheless, it is an important acknowledgement of the economic burden faced by middle-income families.

Based on previous research, we already know that higher income Canadians tend to be overrepresented in the PSE system relative to those with lower earnings. In Canadian universities, for example, students from above median earning families make up 62% of the student population, with students below median income families making up the remaining 38% (MacKenzie, 2013). From our own SFA data, we also know that low and middle-income grant recipients account for only 21% of the Nova Scotia residents PSE student population and 33% of the Nova Scotia resident university student population.

CONCERN: The majority of in-study student assistance recipients come from higher income backgrounds, as defined by student financial assistance policy.

The data above reinforces what we already know about PSE populations in Nova Scotia and elsewhere: that a majority of PSE students come from higher income families. This suggests continued barriers to access for students from low and middle-income backgrounds. It is somewhat surprising, however, to

22 In reality, the total number of CSL recipients may be a slight underestimate of total SFA users. Since eligibility for CSGs is determined first, it is theoretically possible that some applicants' total need is met by those grants and that no further assistance is administered. It is possible, for example, to receive permanent disability grants without receiving other SFA; but since most grants are targeted at low and middle-income individuals, the vast majority of grant recipients also require CSL to meet assessed need.

Figure 4-10. Shares of the Nova Scotia Resident Student Population Receiving Various Forms of In-Study Student Financial Assistance

TYPE OF STUDENT ASSISTANCE	ELIGIBILITY CRITERIA	UNIVERSITY			NSCC			PRIVATE CAREER COLLEGES			ALL INSTITUTIONS		
		# OF STUDENTS	% OF NS STUDENTS	% OF SFA RECIPIENTS	# OF STUDENTS	% OF NS STUDENTS	% OF SFA RECIPIENTS	# OF STUDENTS	% OF NS STUDENTS	% OF SFA RECIPIENTS	# OF STUDENTS	% OF NS STUDENTS	% OF SFA RECIPIENTS
Canada Student Loan	need of $100 or more, after any CESGs have been awarded	7,837	33%		2,997	30%		1,365	47%		12,199	33%	
NS Student Loan and/or Grant	need of $100 or more, after any CESGs and $7,140 in CSL have been issued	5,430	23%	69%	1,357	13%	45%	1,103	38%	81%	7,890	22%	65%
FEDERAL GRANTS (CSG)													
CSG Low Income	family incomes from $20,366 to $53,893 (1 to 7+ people)	3,723	16%	48%	1,136	11%	38%	398	14%	29%	5,257	14%	43%
CSG Middle Income	family incomes from $37,446 to $91,944 (1 to 7+ people)	1,893	8%	24%	644	6%	21%	177	6%	13%	2,714	7%	22%
CSG Dependent	must be eligible for CSG-LI and have custody of at least one dependent child	250	1%	3%	267	3%	9%	283	10%	21%	800	2%	7%
CSG Permanent Disability	must be student with a permanent disability	533	2%	7%	435	4%	15%	84	3%	6%	1,052	3%	9%
NS Grant for Dependents	must be eligible for NSSAP, have calculated need > $275 per week, and have at least one dependent child	298	1%	4%	217	2%	7%	280	10%	21%	795	2%	7%
Total NS Resident Students	**All native Nova Scotians studying at a Nova Scotia PSE institution.**	**23,624**	**100%**		**10,134**	**100%**		**2,876**	**100%**		**36,634**	**100%**	

observe that 79% of Nova Scotia resident PSE students do not receive low and middle-income grants, either because family income makes them ineligible or because they never apply for SFA. Whatever the reasons, it is clear that in-study SFA programs are not fully reaching the lower half of income earners. It is therefore imperative that Nova Scotians be made aware of all SFA programs available to them.

Finally, there are some clear differences between the SFA recipients enrolled in different PSE environments. Notably, NSCC students have the lowest overall rate of SFA usage (30%) and also receive a smaller proportion of low-income grants relative to both university and PCC students. One possible explanation for this is that the generally lower cost of NSCC programs reduces students' assessed need. This is consistent with the observation that fewer NSCC students have sufficient need to qualify for provincial assistance (45%), in stark contrast to the clear majorities of university students (65%) and PCC students (81%) that do qualify.

It is also interesting that PCC students are 300% more likely to have dependents (compared with other PSE students), while permanently disabled NSCC students are 67% more likely to be SFA recipients. The explanations for these data features are less obvious but nonetheless worthy of further consideration.

5. Loan Repayment and Post-Study Financial Assistance

It is equally important to consider the impact of these programs on student borrowers after they leave school. To that end, this section provides brief descriptions and critical analyses of the main government financial assistance programs designed to help supplement post-graduate incomes and/or assist eligible borrowers in repayment to cope with their student debt.

5.1. Student Debt Repayment

The terms and conditions of repayment associated with the Canada and Nova Scotia student loan programs have implications for how government SFA impacts on PSE accessibility. Research evidence suggests that lack of understanding amongst students about these terms and conditions, and government student assistance programs in general, is one of the reasons why some eligible students choose not to borrow and still others choose not to pursue PSE at all (CASA, 2010; Frenette and Ford, 2012).

After graduating (or leaving school), student loan borrowers begin repaying their Canada and Nova Scotia Student Loans six months after the end of their study period (NS Student Assistance Office, 2011; 2013; ESDC, 2013).[23] The basic terms of federal and provincial student loan repayments differ slightly at various stages of the repayment process (see list below).

- Grace Period Rules
    - During the 6-month grace period immediately following one's studies, the CSL Program charges interest on your loan and adds the accumulated interest to your loan principal at the end of the grace period. In contrast, the NSSAP waives the borrower's interest during this period.
- Interest Rates
    - Canada Student Loan borrowers can currently choose between a floating annual rate of prime plus 2.5% and a fixed annual rate of prime plus 5%. Since the 2008 interest rate reduction, Nova Scotia Student Loan borrowers can now choose between a floating annual rate of prime plus 0.5% and a fixed annual rate of prime plus 3%.[24]
- Repayment Term
    - In addition to the six-month grace period, the standard repayment term for both Canada and Nova Scotia Student Loans is 114 months (9.5 years).

5.2 Assistance While in Repayment

A. FEDERAL-PROVINCIAL POST-STUDY FINANCIAL ASSISTANCE

There are a number of repayment programs that apply to both Canada and Nova Scotia Student Loans (NS Student Assistance Office, 2011; 2013; ESDC, 2013).

1. Revision of Terms
Borrowers having difficulty making their monthly payment may apply to reduce their monthly payment by extending the length of their repayment term. Rather than the standard 114 months, the borrower may choose to extend their repayment term to a maximum of 174 months (14.5 years). Importantly, extending one's repayment period invariably results in higher overall loan costs because the amount of each payment to the loan principal is reduced, allowing more interest to accrue. With that said, it is also possible to use a revision of terms to reduce the repayment term and pay off one's student loans faster.

2. Repayment Assistance Plan (RAP)
The RAP makes it easier for borrowers to manage their debt by calculating a more affordable payment based on the borrower's family income, family size, and student loan debt level. Under the RAP, a borrower's monthly payments may be as low as $0 and may not exceed 20% of total family income; the precise payment amount is based on a formula in the Canadian Student Financial Assistance Regulations (SOR/95-329). In addition, the repayment term may not exceed 15 years (10 years for borrowers with permanent disabilities). For most RAP-eligible borrowers, there are

23 Likewise, borrowers who withdraw from school before graduating must begin repaying their loans six months after their official withdrawal date.

24 These are the current borrowing rates. Canada Student Loan borrowers that consolidated their loans prior to August 1, 1995 are subject to different interest rate policies, as are Nova Scotia Student Loan borrowers that consolidated their loans prior to November 1, 2007.

two possible stages to the program.[25]

a. RAP Stage 1 – During the first 60 months (5 years) of RAP eligibility, interest on an eligible borrower's Canada and Nova Scotia Student Loans is paid by the respective government while the borrower's affordable payments (if required) are applied directly to the loan principal.

a. RAP Stage 2 – This stage is for borrowers who continue to face financial difficulties after exhausting all five years of Stage 1 or reaching 10 years since entering repayment. The same basic eligibility criteria apply in stages 1 and 2. The key difference is that the federal and/or provincial governments begin to cover not only the monthly interest but also a portion of the borrower's loan principal. For most borrowers, payments are adjusted to ensure that the loan principal is fully paid by the 15-year deadline; the corresponding deadline for permanently disabled students is just 10 years. Importantly, once a borrower has been approved for RAP Stage 2, they are ineligible to receive any additional loans or grants until the existing loans have been fully paid off.

3. Severe Permanent Disability Benefit Program
In addition to the RAP for Students with Permanent Disabilities program, this program grants immediate Canada and Nova Scotia Student Loan forgiveness to students that are deemed to be severely permanently disabled to the extent that they are unable to participate in the labour force or further PSE for the remainder of their lives.

4. Program to Help Student Reservists
Members of the Canadian Forces Reserves may participate in designated operations without having to make payments on their Canada or Nova Scotia Student Loan. The Canadian Forces Reservists Benefit exempts full-time student borrowers from any financial obligations that might otherwise have accrued on their provincial student loan during their period of service. Student reservists receive an interest waiver for both Canada and Nova Scotia Student Loans for the period of service. In addition, the service period does not count against the Reservist's repayment period nor does it affect their future eligibility for other debt management programs. Finally, the service period is not included in the borrower's eligible weeks of study for student assistance.

B. NOVA SCOTIA-SPECIFIC POST-STUDY SFA

In addition to the federal-provincial programs described above, there are two post-graduate assistance programs specific to Nova Scotia (NS Student Assistance Office, 2011; 2013).

1. Interest Relief Program
This program helps borrowers facing temporary unemployment or loss of income with 6-months of relief from making student loan payments. During that period, the Province carries interest on the loan so that the loan principal remains the same. A borrower may qualify for up to 30 months of interest relief (in 6-month increments).

2. Payment Deferral Program
This program allows borrowers to defer payment on their Canada and Nova Scotia Student Loans for up to 12 months. Borrowers engaged in an internship, residency, apprenticeship, or legal articling term may defer payments over the length of that term.

Interest accrued during this period may be paid back in a lump sum or added to the loan principal at the Province's preferred lower rate of interest and amortized over the remaining repayment period.

3. Debt Cap Program
Beginning with loans issued after August 1st, 2011, Nova Scotia introduced a debt cap to its student assistance program. The debt cap applies to non-professional, undergraduate degree programs of at least four years in length. The program must also be the student's first PSE program funded by the NSSAP program. The key financial details of the debt cap program are as follows:

- Students must graduate from the qualifying program of study with total accumulated student debt in excess of $28,580, which is the established value of the Debt Cap and is equivalent to the maximum level of federal student loans over a four-year period.

Figure 5-1. Estimated Debt Cap Benefits Due to Graduates in Annual Cohorts from 2011-12 to 2014-15

	GRADUATION YEAR			
	2011-12	**2012-13**	**2013-14**	**2014-15***
POLICY				
Grant/Loan Ratio	30/70	35/65	40/60	40/60
Weekly assistance	$160	$170	$180	$180
Maximum Grant	$1,632	$2,023	$2,448	$2,448
Maximum Loan	$3,808	$3,757	$3,672	$3,672
BENEFITS TO GRADUATES				
Total Benefit	$3,808	$7,565	$11,237	$14,909
Provincial Loan Debt	$0	$0	$0	$0
Federal Loan Debt	$28,560	$28,560	$28,560	$28,560

**assumes no policy change for 2014-15*

25 RAP for Borrowers with Permanent Disabilities has only stage, which corresponds to Stage 2 of the main RAP program.

- Students taking more than four years to complete their degree are only entitled to the Debt Cap for the first four years. To remain eligible for the Debt Cap, the program must be completed in no more than eight years.
- Under the founding terms of the Debt Cap program, students entering the second, third, or fourth years of a qualifying program of study in 2011-12 are also entitled to a prorated debt cap when they graduate.

Based on the above policies, an undergraduate student entering their first year in 2011-12 and borrowing the maximum student loan in each of their four years would be eligible for four full years of Debt Cap benefits while students further advanced in their programs of study would be eligible for the pro-rated amounts as indicated in Table 5-1.

5.3. Post-Graduate Tax Measures

Significant post-graduate SFA is also delivered through the federal and provincial tax systems. This section briefly summarizes each of the student-specific tax credits available to students studying in Nova Scotia (Department of Finance Nova Scotia, 2011; 2013; Canada Revenue Agency, 2013).

A. FEDERAL TAX CREDITS

Certain expenses directly related to one's PSE or other degree can be claimed against Federal income taxes through a number of non-refundable tax credits, which are intended to increase the after-tax returns on educational investments.

1. Education Tax Credit
This credit is valued at $400 per full-time month of study and $120 per part-time month of study, or $3200 and $960, respectively, per 8-month study period. Permanently disabled students studying part-time are eligible to claim the full-time credit amounts.

2. Textbook Tax Credit
This credit is valued at $65 per month for full-time studies and $20 per month for part-time studies, or $520 and $160 respectively, per 8-month study period. As above, permanently disabled students studying part-time are eligible to claim the full-time credit amounts.

3. Tuition Tax Credit
This credit is valued at the actual tuition fees paid in the tax year, provided the total amount exceeds $100.

4. Student Loan Interest Tax Credit
Interest paid on government student loans can also be claimed against federal taxes payable. There is no maximum value for this credit meaning that the full amount of interest paid can be claimed.

The actual credited value for each of the above is determined by applying the lowest federal income tax rate (15%) to the total eligible credit amount. During their studies, most students cannot earn sufficient income to take full advantage of credits 1-3. A student may choose to carry forward the full value of their unused credits for use in a future tax year. Once an amount has been carried forward, it may not be transferred to another person. Alternatively, a student may choose to transfer a portion of their unused credit amounts (up to $5,000 per tax year) to a parent, grandparent, legal guardian, spouse or common-law partner.

B. PROVINCIAL TAX CREDITS

1. Tuition and Education Tax Credit
This credit is the provincial analog of the above federal credits. It is valued at the actual cost of tuition PLUS $200 per full-time month of study and $60 per part-time month of study, or $1600 and $480, respectively, per 8-month study period. Like the federal amounts, unused portions of this credit may be carried forward indefinitely or transferred to an eligible individual (only in the same year the credit was earned). The applicable provincial tax rate for determining the actual credited value is 8.79%.

2. Graduate Retention Rebate
The Graduate Retention Rebate (GRR) is a non-refundable tax reduction introduced by the NDP government in 2009 to replace the previous Post-Secondary Tax Credit (PSTC). In the six years immediately following the completion of any university degree (undergraduate, graduate, or professional), graduates can reduce provincial tax payable by up to $2,500 ($1,250 for diploma programs). The GRR tax reduction is applied after all other provincial tax credits have been applied. Unlike the credits described above, any unused portion of the GRR cannot be carried forward to subsequent years.

3. Student Loan Interest Credit
Interest paid on government student loans can also be claimed against provincial taxes payable. As with the federal loan interest credit, there is no maximum value for this credit: the full amount of interest paid can be claimed (subject to the 8.79% tax rate).

5.4 Accessibility Impact of Post-Study Financial Assistance

In 2012, 70% of graduates from Nova Scotia universities reported carrying some debt at the time of graduation (CUSC, 2012). Based on the number of university credentials granted in 2011, this represents nearly 6,900 debtors graduating in any given year (MPHEC, 2013b) in addition to all NSCC and PCC graduates with debt as well as any individuals with loans who leave school without graduating. Furthermore, since

52% of all Nova Scotian residents studying in-province in 2011 were also recipients of government SFA, we can infer the majority of graduates' debt is owed to governments (NS Student Assistance Office, 2013). As the primary creditors for a majority of graduate debt, governments have both the power and the responsibility to ensure that borrowers are able to manage their debt effectively without sacrificing their financial security. This is especially important for Nova Scotia's government because of the established link between graduate debt and youth outmigration (CASA, 2010).

A. ACCESSIBILITY IMPACT OF REPAYMENT TERMS AND ASSISTANCE PROGRAMS

While there continues to be room for improvement, the range of federal and/or provincial programs currently in place to help students manage their debt has arguably never been stronger or more clearly defined. There are multiple levels of assistance available to individuals having trouble making the expected payments.

The RAP, in particular, defines a clear process with a specific timeline for the provision of escalating levels of assistance to individuals in continuous need: first, RAP Stage 1 interest relief with affordable borrower payments applied directly to the principal; then RAP Stage 2 with direct help paying down the loan principal; then finally, full loan forgiveness after a maximum of 15 years in repayment. Obviously, most student borrowers would rather earn the necessary income to pay their loans back in a timely fashion without such assistance, but the recently revamped RAP, in particular, provides a vitally important safety net to those who cannot.

If there is any criticism to be made about RAP and other debt management programs, it is that they are not well understood by individuals prior to the decision to take on (or not take on) debt. For some potential borrowers, we cannot underestimate the psychological impact of knowing that fair and transparent mechanisms for loan forgiveness exist, if they are needed. With such information available to them, individuals who would otherwise choose to forego or delay entry into PSE might reasonably make a different decision.

> **CONCERN:** Student loan repayment conditions and debt management programs available to student loan borrowers are poorly advertised and poorly understood by the student population.

Debt Cap

Nova Scotia's recently introduced Debt Cap program is an even more important addition to the post-graduate assistance regime for student borrowers. *StudentsNS* strongly supports programs that are progressively targeted to individuals with the largest financial barriers. We also support programs that reduce overall levels of student debt. The Debt Cap checks both of these very important boxes.

The program represents up to four years of provincial loan forgiveness (a 100% retroactive grant) for students that have borrowed the most (i.e. a maximum CSL of $28,560 plus some amount of NSSL). The program has not reached full implementation so we cannot fully assess the impact on student debt, but it is guaranteed to reduce overall debt (and average debt) by virtue of its timing – average graduate debt in the most recent available year, $30,128, was above the established Debt Cap – and the sheer number of beneficiaries: 63% of all SFA applicants qualify for maximum CSL. Furthermore, since 37% of all SFA recipients qualify for less than maximum CSL, the average student debt at full implementation will quite likely be less than the full debt cap amount.[26]

Yet, while we generally support the debt reduction approach represented by the Debt Cap, there is considerable debate about several features of the program. The available university graduation statistics suggest one obvious flaw that greatly limits its impact on student debt reduction. For example, because only 38% of all university entrants graduate within the expected four years, the four-year limit on the debt cap provides only partial protection for a significant number of graduates, including an additional 15% who finish after five years, the 5% who graduate after six years, and the 9% of students in programs designed to be five years in length (MPHEC, 2013b). If nothing else, this data suggests that our expectations around 'normal' program length are too rigid and that the debt cap program should perhaps be flexible to accommodate students' academic experiences.

> **CONCERN:** The four-year limit on Debt Cap benefits is impractical relative to the actual time-to-completion for many graduates.

In addition to many undergraduates, the Debt Cap also excludes all graduate and professional students and all non-university students. Again, this policy does not exist to service the best interests of students or any particular social and/or economic objective, but rather to limit overall program costs by rationing to first time undergraduates. In the end, this is arbitrary discrimination between similar individuals making important investments in their own education. Together with the four-year limit, this policy suggests that the debt cap program, as structured, excludes far too many students by narrowly defining the eligibility criteria.

26 For the last four years (2009-2012), the cumulative average CSL amount was $26,079 for university students, $25,594 for NSCC students. PCC students are typically less than four years in length, with slightly higher annual CSL averages (averaging $8,349 annually per borrower over the last four years).

CONCERN: The existing Debt Cap eligibility criteria exclude many post-secondary students from the benefits of this program, including all non-university students, graduate students, and professional students.

Finally, the debt cap's retroactive structure, whereby eligibility for debt cancellation is achieved at graduation, is sub-optimal from an accessibility perspective. Administering the debt cap as an up-front grant to all provincial loan borrowers may encourage a larger number of debt-averse individuals to accept government SFA and attend a PSE institution; a 100% up-front grant would undoubtedly provide a psychological safety net similar to that of the RAP, albeit at significant additional cost (estimated at $5.3 million; see Section 6 for details). A 100% up-front grant regime would transfer significant funds to individuals who do not subsequently obtain a credential, which is a potential concern from a return-on-investment perspective. However, it is doubtful that the debt cap is a very effective mechanism for supporting student academic persistence. As well, a 100% up-front grant would with the greatest financial need the most, enhancing the overall progressiveness of our SFA regime.

Tax Credits

At the national level, previous research has shown that higher income families (incomes above median) receive the majority of benefits from federal education tax credits (approximately 60%) (Usher, 2004b). This is hardly surprising, given that participation in PSE is heavily skewed toward individuals from higher income families. Yet, because this is true, it is also clear that governments are expending considerable resources on higher income individuals who require less encouragement to participate in PSE.

CONCERN: Post-study student financial assistance delivered through tax credits disproportionately benefit higher income students and families.

To make matters worse, federal government expenditures on education tax credits have more than doubled since 1994, from $500 million to $1.3 billion, with most of that growth going to higher income individuals (either transfers to others or carry forwards to future years) (Neill, 2013). In 2012, only one third of all educational tax credits were claimed by current students, with the rest claimed by a transferee (parent, grandparent, spouse) or an individual claiming a previously accumulated credit.

Table 5-2a. Benefit Features, Claimants, and Total Costs of Federal Non-Refundable Education Tax Credits

FEDERAL TAXES (2009)	CLAIM AMOUNT		AVG CLAIM	# OF CLAIMS	% OF CLAIMS	COST TO GOVT	% OF COST
	MONTHLY	ANNUAL (8 MO)					
Student Loan Interest	n/a	n/a	597	25,280	31%	2,264,850	5%
Tuition, Education, and Textbook	$465+tuition	$3,720+tuition					
self/partner			5,031	38,370	47%	28,957,050	63%
from child			5,136	18,690	23%	14,399,700	32%
				82,340	100%	45,621,600	100%

Table 5-2b. Benefit Features, Claimants, and Total Costs of Provincial Non-Refundable Education Tax Credits

PROVINCIAL TAXES (2011)	CLAIM AMOUNT		AVG CLAIM	# OF CLAIMS	% OF CLAIMS	COST TO GOVT	% OF COST
	MONTHLY	ANNUAL (8 MO)					
Student Loan Interest	none	none	603	24,167	20.7%	1,207,970	3.1%
Tuition and Education	$200+tuition	$1,600+tuition					
self			3,992	42,966	36.7%	7,951,750	20.1%
partner			3,076	19,055	16.3%	2,866,201	7.2%
from child			4,569	15,956	13.6%	6,322,112	16.0%
Graduate retention (same year)	n/a	$2,500	1,588	4,156	3.6%	4,869,512	12.3%
Graduate retention (prior year)	n/a	none	$1,746	10,670	9.1%	16,369,043	41.3%
			15,574	116,970	100.0%	39,586,588	100%

Of course, the opportunity cost of investing in individuals who do not need financial help is having fewer resources to make targeted investments to encourage and support PSE participation among those who do. Thus, it is essential that we more precisely understand the distribution of education tax credits at the provincial level.

Our analysis finds that the available tax benefits are somewhat more progressively distributed in Nova Scotia than at the national level. Figure 5-1a shows the distribution of education tax credit claims by the pre-tax income level of all tax filers (Statistics Canada, 2011). Similarly, Figure 5-1b shows the distribution of benefits (in dollars) accruing to tax filers at all income levels. In each case, the midpoint of the distribution occurs within the $35,000 to $39,999 income bracket: this means that the median claimant and the median benefit dollar transferred to Nova Scotians occur at roughly the same point in the income scale. At this income, a single earner is just below the median provincial income for families of any size ($42,000). Two earner families at this level (2 times $35-40k) would be above the median income for families of two or more ($64,000) (Statistics Canada, 2013 – Table 202-0410), but still well within CSLP's definition of a "middle-income family" (see Appendix B online).

On an individual basis, the various education tax credits break down somewhat differently (Table 5-2a;b). Student loan interest credits and tuition, education, and textbook (TuEdTx) credits self-claimed by students (or graduates) are skewed toward the lower end of the income scale (median claimant and median benefit dollar are at or below the $40-45k bracket). Not surprisingly, TuEdTx credits transferred to parents or grandparents are skewed toward higher income levels (median claimant and benefit dollar are between $60-70k on the income scale). This is a reflection that parents and/or grandparents typically make higher incomes than students and/or recent graduates with available tax credits.

Our analysis of federal education credits across Nova Scotia's income strata suggest a more equitable distribution than was expected; and while similar tax filer data are not readily available for the provincial tax system, the distribution of the various provincial credits is more or less the same as that of the federal analogues. [27]

Of course, the one provincial credit without a federal analogue is the GRR. Unlike the other educational tax credits, unused GRR amounts may not be indefinitely carried forward to subsequent years; instead, they may only be claimed in the six years immediately following graduation. Nova Scotia's tax system is structured such that the GRR is deducted after all other non-refundable credits have been exhausted. For this reason, the largest beneficiaries of the GRR are those who make relatively high incomes immediately after graduation. In fact, the typical GRR recipient has an income above the provincial median.[28]

In addition to the distributional issues, neither the GRR nor the previous PSTC has proven to be an effective mechanism for achieving the intended goals of retaining and attracting recent graduates to our province. Other Canadian provinces – notably Manitoba and New Brunswick – have introduced similar tax credits in recent years with no measurable impact on retention or recruitment (Usher, 2009). In Nova Scotia, the youth population (aged 15-24) has been in decline since 2006, the same year that the PSTC was first introduced. Over that period, the youth population has shrunken by nearly 7,000 individuals. In addition, outmigration from Nova Scotia to other provinces has continued over this entire period, accelerating since 2009, when the GRR replaced the PSTC. In 2012, total outmigration to other provinces reached a 10-year high of 4,300 people. Taken together, this data strongly suggests that neither the GRR, nor its predecessor, have had any significant impact on youth recruitment and retention in Nova Scotia (Bendiner, 2013; Statistics Canada, 2013; Table 282-0087).

On top of the issues with the GRR, each of the other provincial tax expenditures are redundant and therefore wasteful because they simply mirror the incentives created by their federal analogues. This raises a serious question about whether provincial resources could be spent more effectively to enhance accessibility and affordability for the most needy students.

CONCERN: Post-study student financial assistance delivered through provincial refundable tax credits, in particular, are less generous and also redundant incentives to their analogous federal tax credits.

In addition to being regressive in their distribution, the benefits of non-refundable tax credits are both less generous than their federal counterparts (Table 5-2) and poorly timed for the students receiving them. Any benefits accruing to students or their families in the year of study happen through the federal income tax system, meaning that they occur near the end of the academic year. Further to this, many students (or their families) earn too little income to benefit from these tax measures within the study year and as a result, these benefits are typically enjoyed much later (i.e. after the student has graduated and become employed), which, by design, is also true of the GRR). Again, carry forwards (combined with transfers) have accounted for most of the growth in federal education tax expenditures (Neill, 2013), highlighting the poor timing and poor targeting of these investments.

CONCERN: Post-study student financial assistance delivered through tax credits are poorly timed to assist students when they need financial help the most – while they are studying.

27 Personal Communication, Department of Finance; 2013.

28 Ibid.

6. A Stronger, More Progressive Student Assistance Regime

Nova Scotia's student financial assistance framework is comprised of two different assistance providers, delivering many SFA programs, at multiple intervention points, to serve a diverse student population. Given this complexity, it is perhaps unreasonable to expect students and their families to make sense of programs available to them. Demystifying these programs and policies for Nova Scotia's students has been one critical objective of this project.

In addition to this, a more substantive objective has been the identification of critical areas of weakness in Nova Scotia's SFA regime and to propose solutions designed to enhance the accessibility and affordability of PSE in Nova Scotia. Based on the analysis above, this section presents a package of incremental proposals designed to help fulfil three important objectives:

1. To enhance the accessibility of PSE in Nova Scotia to underrepresented or disadvantaged groups;
2. To provide students the money they need while they study; and
3. To reduce the burden of student debt on new graduates.

These objectives fit within *StudentsNS*' long-term vision of building *the strongest, most progressive student financial assistance program in Canada.*

6.1. SFA In Nova Scotia – Our Long Term Vision

Ideally, all Nova Scotian children would receive an excellent, comprehensive P-12 education that fully prepares them to pursue any PSE program of their choice. And after making that choice, each aspiring PSE student would be offered an opportunity to attend that college or university free-of-charge. Unfortunately, Nova Scotia fails to achieve this ideal on a number of fronts. Many children are not fully prepared to pursue PSE, either academically or financially. Similarly, our previous work has shown that it is not financially possible at the present time for government to provide every qualified child with free PSE. The Province's current finances and economic conditions simply do not permit it (*StudentsNS*, 2013).

Despite these stark realities, there are concrete, incremental steps we can take that will move us along the road to achieving this ideal. As a starting place, the Province of Nova Scotia should make a number of commitments to its current and future PSE students.

1. Financial barriers will never stand in the way of any qualified Nova Scotian wishing to pursue PSE.
2. Low-income Nova Scotians, in particular, should receive the most financial assistance with the minimum repayment requirements possible.
3. Loan burdens for all borrowers will be fair and manageable in relation to one's post-graduate income.
4. The government commits to continuous action to help remove other social barriers to PSE access.

The recommendations herein will help Nova Scotia's government to partially fulfill each of these commitments, but most substantially the first three of them. The fourth commitment is much more complicated. It requires considerable efforts to more fully understand the barriers that exist and will almost certainly require substantial resources to begin tearing down each of these barriers in turn. *StudentsNS* is committed to beginning this work as part of our on-going research agenda. We call upon the Province of Nova Scotia and all of its PSE institutions and stakeholders to work with us on this all-important initiative.

RECOMMENDATION: *The Province of Nova Scotia and all interested PSE stakeholders should join with StudentsNS to investigate the existing social barriers to PSE access and create a comprehensive strategy to eliminate these barriers.*

6.2. Short-Term SFA Policy Agenda

Obviously, breaking down each and every barrier to PSE accessibility in Nova Scotia will be a long-term project. But we can take significant steps, here and now, to reduce the major financial barriers identified in this report.

A. PAYING FOR CHANGE

To truly improve financial accessibility for the most needy students, the Province must commit considerable resources to achieving the task. Based on our analyses, *StudentsNS* believes that these resources can and should be found by eliminating poorly targeted or ineffective SFA programs. In particular, the Province of Nova Scotia should take the bold step to eliminate the full suite of provincial education tax credits and reallocate the associated cost savings to reducing financial (and other) barriers to PSE accessibility in Nova Scotia.

RECOMMENDATION: *The Province of Nova Scotia should eliminate the Graduate Retention Rebate, the Tuition and Education Tax Credit, and the Student*

Loan Interest Tax Credit. All cost savings should be reinvested in student financial assistance and other necessary measures to improve the accessibility and affordability of post-secondary education in Nova Scotia.

StudentsNS recognizes that eliminating all of the existing education tax credits may be perceived as radical reform to some Nova Scotians, in particular those who currently benefit the most from them. In reality, however, it is really a practical and necessary step to making our PSE system more progressive and more accessible to those facing significant access barriers. Our research shows that:

- First and foremost, in addition to being less generous, the provincial education tax credits are also redundant to their analogues in the federal income tax system. Their power as incentives is therefore minimal.
- The poor timing of tax benefits further reduces their incentive power and general impact on access and affordability. Students with sufficient income may receive some financial benefits in their annual tax returns (at the end of each school year), but a significant portion of these credits is carried forward until the student graduates and enters the work force. Post-graduate benefits may reduce one's debt burden but they do nothing to help needy students during the critical period when they are actually studying.
- While the distribution of such tax benefits may be more equitable in Nova Scotia than in Canada as a whole, these tax credits generally continue to favour higher income individuals and families over lower income families and students currently engaged in their studies. Higher income Nova Scotians require fewer incentives to pursue PSE in the first place, but continue to receive a disproportionate share of scarce public resources through so-called "universal" programs (e.g. tax credits, CESG).
- The GRR, in particular, has not only failed to achieve its intended result, it exemplifies all that is wrong with SFA programs delivered via the tax system: it only takes effect after graduation and it helps those who need it least by favouring higher income graduates with more generous benefits. Most importantly, the GRR is a highly wasteful because it is by far the most expensive of the provincial tax measures (52% of the $40 million total in 2012) (see Table 5-2b).

While the elimination of these credits is not a policy decision to be taken lightly, the payoff can be enormous. The $40 million in potential savings is nearly as large as the total envelope of all In-Study SFA benefits disbursed to Nova Scotians in 2012 ($48 million, while the GRR alone is set to reach at least $46 million when the program is fully implemented in 2014 (see Table 6-1). Thus, the total pool of funds that could be reallocated to the right SFA priorities is at least $66 million, making PSE more affordable for the vast majority of Nova Scotian students and much more accessible to those facing the most complex obstacles to furthering their education.

B. BRIDGING THE FINANCIAL GAP FOR STUDENTS IN NEED

As described above, Nova Scotia's In-Study SFA programs are explicitly not intended to provide all of the funding students may need to finance their education. Students (and/or their families) are expected to make significant financial contributions to meet the cost of their chosen PSE programs. As a result, a significant number of SFA recipients are left with some amount of so-called "unmet need" even after receiving all of the SFA for which they are eligible. In 2012-13, there were 1,465 such students (in Nova Scotia university only) with total unmet need of over $3.9 million.

StudentsNS believes that, in most circumstances, it is fair and appropriate that students and their families are expected to share the financial responsibility of pursuing PSE. For myriad reasons, however, there will always be students who cannot come up with the expected contribution on their own (e.g. student unemployment or underemployment, a parent or spouse who cannot contribute the expected amount, etc.). Students attending universities with higher fees also feel the additional pinch of having less money to meet their living costs and/or having less time to study because they are forced to work.

The worst-case scenario involves students with significant unmet being unable to attend PSE because they simply cannot scrape together the money. Others need to take on expensive debt from private lenders.

Figure 6-1. Projected Savings by Eliminating Provincial Non-Refundable Education Tax Credits and the Graduate Retention Rebate

TAX MEASURES	ACTUAL			PROJECTIONS		
	2009	2010	2011	2012	2013	2014
Current Year GRR	$3,851,000	$5,089,273	$4,869,512	$4,979,393	$4,979,393	$4,979,393
Previous Years GRR		$7,283,791	$16,369,043	$24,553,565	$32,738,087	$40,922,608
Other Credits			18,348,033	18,348,033	18,348,033	18,348,033
TOTALS			**$39,586,588**	**$47,880,991**	**$56,065,512**	**$64,250,034**

The latter is an all-too-common phenomenon for students in more costly advanced degree programs (e.g. medicine, dentistry, law), and while these programs often promise large returns, the prospect of taking on such enormous debt can be a crippling barrier to otherwise qualified students, particularly those from low and middle-income backgrounds. Furthermore, the expected returns on any investment are never guaranteed.

RECOMMENDATION: *The Province of Nova Scotia should eliminate the limit on provincial student financial assistance, currently $180 per study week, for all SFA-eligible students studying at public institutions in Nova Scotia.*

A fair and equitable SFA system for Nova Scotia is one that completely eliminates financial barriers for all qualified individuals pursuing PSE. Setting an arbitrary limit on the assistance available is not consistent with this critical principle.

Existing policy and practice makes allowances for many special circumstances that result in students facing higher costs and/or having fewer resources. This includes an excellent appeals process that, while not widely-advertised, provides students with ample opportunity to receive additional consideration for their unique circumstances. The NSSAP should undertake greater efforts to inform students of its appeals process and also always strive to ensure the process is as compassionate as possible.

RECOMMENDATION: *The Nova Scotia Student Assistance Program should develop and implement mechanisms to inform all students about the existing student assistance appeals process and to make the Higher Appeals Board more accessible to individuals across the Province.*

RECOMMENDATION: *In consultation with StudentsNS and representative students, the Nova Scotia Student Assistance Program should work to make the appeals/dispute resolution process as compassionate as possible for all students but in particular those individuals facing serious and verifiable health issues.*

Eliminating unmet need is just one piece of the puzzle. For some students, the existing policies that determine their expected contributions are also fundamentally unfair. For some dependent students, the expected parental contributions far exceed what parents can actually afford to contribute. This is at least partly because the allowable "moderate standard of living," does not account for things like parental contributions to retirement funds or contributions to RESP accounts for an applicant's younger siblings.

These are important priorities for many families, which all levels of government have a clear interest and responsibility to support. Current SFA policy creates an intergenerational tension within families and unfairly forces parents into the moral dilemma of balancing their own interests against those of their children.

Of course, the very same moral dilemma may also exist for married students and/or students with dependent children. In our view, this is equally inappropriate and unfair.

RECOMMENDATION: *When assessing student assistance applications, the Nova Scotia Student Assistance Program's calculation of expected resources should give consideration to additional student and/or family costs, including, but not limited to, registered retirement savings and registered education savings for dependent children. With appropriate documentation, an applicant's resources calculation should be reduced by the actual amounts contributed to a registered pension plan (RPP), registered retirement savings plan (RRSP), and/or a registered education savings plan for a dependent child (RESP), and/or a registered disability savings plan (RDSP).*

In addition to the above, married students and students with dependents suffer further inequities from existing policy. Critically, these students and their families are afforded a meagre living allowance relative to the "moderate standard of living" allowance afforded to parents of dependent students. There is simply no justifiable basis for a policy that imposes different acceptable living standards to different groups of people facing similar costs.

RECOMMENDATION: *The cost allowances used by the Nova Scotia Student Assistance Program to calculate each applicant's available resources should be sufficient to allow all applicants (and/or their families) a similar standard of living, regardless of the applicant's student category.*

One group of students at a particular disadvantage are those with high-income parents that either cannot or will not help contribute the expected financial contribution to their child's education. Unfortunately, depending on the circumstances, such students may not be eligible for any government student financial assistance and as a result must entirely self-fund their education. Variable employment prospects and a host of other factors can make this unduly challenging. *StudentsNS* believes government has a role to play in supporting these students because no one benefits if such students choose not to pursue an education or do so only with costly private debt.

RECOMMENDATION: *The Province of Nova Scotia should develop and execute a public education campaign using moral suasion to inform parents about the costs of a post-secondary education in Nova Scotia and educate them about the risks their children face without their financial help.*

RECOMMENDATION: *The Province of Nova Scotia should provide supplementary student loans to dependent students with parents who cannot or will not contribute the expected funding to their child's education.*

StudentsNS is not convinced that these NSSAP recipients should automatically be subject to all of the same debt relief conditions available to other students, including notably automatic grants and heavily subsidized interest rates. Otherwise, parents with the ability to pay would have little incentive to do so. We are committed to studying these issues in our upcoming research and invite the Province and other stakeholders to join us in this work.

RECOMMENDATION: *Together with StudentsNS, the Province of Nova Scotia should commit to studying its approach to debt relief for students repaying supplemental student loans.*

C. REDUCING STUDENTS' DEBT BURDENS

The recommendations proposed above are designed to ensure that no qualified Nova Scotian is forced to forego post-secondary studies as a result of their financial situation. Of course, the flip side of providing more financial assistance to students is the possibility of burdening those students with more student debt. Despite the strong programs already in place, particularly the Repayment Assistance Plan and the provincial Debt Cap, the recommendations below are intended to mitigate this risk to the greatest degree possible and to reduce the debt burden for all Nova Scotia SFA recipients.

The issue that is easiest to address is the current information gap that exists around the student financial assistance programs that are available to Nova Scotians. Given the immense responsibility that comes with taking on student debt, *StudentsNS* believes that government has a clear responsibility to educate students about this important financial decision before they begin to borrow.

Currently, the most readily available information about the programs can be found on the Provincial Government's student assistance website (NS Student Assistance Office, 2013). Unfortunately, the site is not only out-dated, but is also poorly organized, incomplete, and difficult to navigate and understand at a glance. Furthermore, despite extensive efforts at improved outreach to students in the public education system by student assistance program staff, feedback from multiple sources suggests that there is considerable room for improvement in this area. Government has the ability to address both of these issues directly and at little cost. Research clearly indicates that these barriers have a negative impact on accessibility. We must do more to eliminate them.

RECOMMENDATION: *The Province of Nova Scotia should develop an engaging and user-friendly informational web portal that clearly explains the essential features of the student assistance program from application to repayment.*

RECOMMENDATION: *The Province of Nova Scotia should create an interdepartmental strategy for disseminating information about the student financial assistance program between the Department of Labour and Advanced Education and the Department of Education and Early Childhood Development. A key objective of this strategy should be to deliver timely, accurate information on post-secondary education and student financial assistance to students within Nova Scotia's public education system.*

As we have recommended previously, PSE institutions and the government are responsible for providing all students with the best possible estimate of the expected costs of their chosen program of study, including a projected schedule of tuition and fees to be paid over the entire program (*StudentsNS*, 2013). This is important for all students, but especially for those who must borrow to pay for their studies.

It is equally important that borrowers receive all of the information they need to understand the potential future debt burden associated with receiving student assistance. This could include, for example, providing each student with periodic statements of their total existing debt, the current terms of repayment, and what their expected loan payments would be if they started paying them back immediately. Such a practice does not currently exist but could be implemented as part of the existing student loan applications process with minimal cost and effort.

RECOMMENDATION: *Students reliant on government loans to finance their education should be provided with all necessary information to better understand their potential debt burden, on an on-going basis, throughout their program of studies. At a minimum, this should include a clear explanation of the total amount of repayable financial assistance being offered, a reminder of any existing debt the borrower already holds, and the expected terms of repayment based on the total estimated debt amount.*

In addition to the primarily administrative and information-based recommendations above, the Government must also take more substantive steps to reducing student debt burdens. Based on our analysis, *StudentsNS* supports the debt reduction approach represented by the provincial Debt Cap program. The program represents a generous 100% retroactive grant for eligible borrowers and is appropriately targeted at low-income and/or high-need individuals. However, given that eligibility for the Debt Cap program is targeted to individuals with the greatest financial need, restructuring the program as an unconditional up-front grant would automatically reduce the debt burdens of individuals facing the greatest financial access barriers.

Furthermore, the realities of many undergraduate students' lives often require them to extend their studies beyond the optimal four years covered by the Debt Cap. Such circumstances would include students struggling to meet academic requirements, needing to work to help finance their education, or perhaps facing adverse personal events that interrupt their studies. In addition, some students may enrol in programs designed to be longer than four years in length, which immediately excludes them from avoiding provincial debt like their cohorts in typical four-year undergraduate programs. Students in multi-year NSCC programs are similarly excluded.

Finally, students pursuing additional degrees (i.e. graduate, professional) are not included in existing Debt Cap policy. This does not mean that debt-management policies are currently a non-issue for this group. To the contrary, such programs are often more expensive than the typical undergraduate degree or college diploma. Our above recommendations – to raise allowable living standards for all students, to recognize certain additional expenses for students with families, and to eliminate the cap on provincial assistance levels provided to individuals – will clearly make SFA more accessible, but could also greatly expand the debt of such students. And despite common assertions to the contrary, not all of these students are destined for astronomically high incomes in the future. With this in mind, we believe that graduate and professional students should be eligible for the same debt reduction programs as other students.

RECOMMENDATION: *The Province of Nova Scotia should provide all provincial student financial assistance in the form of an up front grant for students studying at a public post-secondary institution in Nova Scotia.*

6.3. Costs of Change and Other Considerations

The policy changes recommended herein will greatly enhance a SFA regime that is already much improved from its low-point in the mid-2000s. This is particularly true for those students that choose to pursue their education at one of Nova Scotia's many public PSE institutions. *StudentsNS* believes these changes would give Nova Scotia the strongest and most progressive SFA system anywhere in Canada.

Of course, the cost of the proposed changes must also be carefully considered. Are these changes affordable for Nova Scotians? The short answer is 'Yes, and then some!' We have already made the case for the elimination of $40 million in provincial tax credits, a figure that will rise to at least $64 million in the 2014 tax year when the GRR is scheduled to reach full implementation.

Table 6-2 depicts the other side of this equation: the incremental costs of the five recommendations we expect to be most costly to implement. Based on these numbers, our high-end estimate for these five recommendations is approximately $21 million annually (half of the 2011 tax expenditure costs and just a third of the projected 2014 costs). In either case, the left over funds ($19-43 million) are sufficient to account for larger than expected program uptake, our other less costly recommendations, and any additional implementation costs resulting from administrative or technological change. Any cost savings remaining after all recommendations are implemented should be retained in the PSE system and allocated in cooperation with *StudentsNS* to further promote PSE access and affordability.

Figure 6-2. Projected Additional Costs of Major Student Financial Assistance Recommendations of this Report

	ESTIMATE ($)	BENEFICIARIES
Eliminating unmet need at NS public institutions*	$5.26 million	1,727
Converting Debt Cap to Up-front Grant*	$5.25 million	all NSSL recipients at NS public institutions: 6,800
Married students converted to MSOL assumption*	$0.85 million	662
Cost allowances for registered retirement, education, and/or disability savings programs	Difficult to assess uptake and costs for this program; depends on current usage of various programs Estimate: $0-5 million	
Supplemental Loans for Dependents of High Income Parents	Difficult to assess uptake and costs for this program; not expected to be large Estimate: $0-5 million	

* *Estimates provided by the NS Student Assistance Office*

A. THE FEDERAL GOVERNMENT'S ROLE

The recommendations above are aimed primarily at the provincial government, which funds and administers its own In-Study SFA program and also administers the federal program on behalf of the Government of Canada. With that said, many of the arguments we have made apply equally to the federal student loan program. For example:

The federally-sponsored universal education savings programs (CESG, CLB) tend to favour higher income Nova Scotians as do education tax credits, while Nova Scotia's lower income status as a Province reduces our proportionate share of these federal investments;

- The inequitable standard of living assumptions and the exclusion of retirement, education, and disability savings from In-Study SFA allowable costs policies arise from policies shared between the federal and provincial programs;
- Like the Province of Nova Scotia, the Government of Canada incurs significant costs by servicing and/or writing off the debts of borrowers having difficulty repaying. Federal student loans write-offs in 2011/12

and 2012-13 totalled $541 million[29] while the federal RAP for Nova Scotians costs the Canadian Government approximately $4 million annually;

Based on all of the above, it is clear that Nova Scotians could greatly benefit if the Government of Canada took steps to align its SFA policies with those of Nova Scotia (including our new recommendations). In addition to eliminating the inherent flaws in program design, closer coordination of federal and provincial programs would make our student assistance system more efficient and more equitable.

Of course, while we encourage the Province to engage with its federal partners to help address the accessibility and affordability issues identified herein, we also recognize that our provincial government is in the best position to act on these important issues on behalf of Nova Scotians. While a lack of federal cooperation could complicate the implementation of our recommendations to some degree, *StudentsNS* would still expect the Province to address the underlying issues to the best of its ability.

29 These write-offs cover debts dating back over 10 years. Based on our share of the federal population, Nova Scotia's proportionate share of this debt write-off is in the neighbourhood of $15 million (ref)

7. *StudentsNS* Policy Resolution

WHEREAS, *Students Nova Scotia* believes in the following PRINCIPLES:

Every qualified Nova Scotia student who wishes to pursue post-secondary education should be able to do so, irrespective of their financial situation, socioeconomic or ethnic background, physical, psychological or mental ability, age, sexual orientation, geographic location, or any factor other than qualification.

The cost of post-secondary education in Nova Scotia should not cause undue hardship upon any student or make them financially unable to live in Nova Scotia.

The concepts of accessibility and affordability of post-secondary education are not equivalent to one another, but are inextricably linked.

Expanding access to post-secondary education for individuals with high financial need is prioritized.

Any increase in post-secondary education costs must be matched by available student financial assistance. Otherwise, accessibility for students with the greatest need will be diminished.

AND WHEREAS, *Students Nova Scotia* has identified the following CONCERNS:

A lack of data on the post-secondary participation of different social groups – including but not limited to African Nova Scotians, Aboriginal Nova Scotians, low income Nova Scotians, and first generation students – hinders effective policy analysis on the accessibility and affordability of PSE for Nova Scotians.

The requirement to establish a Registered Education Savings Plan excludes most Nova Scotian families from receiving the universal benefits of the Canada Learning Bond and Canada Education Savings Grant programs.

The largest beneficiaries of federal Pre-Study Financial Assistance programs – the Canada Education Savings Grants and Canada Learning Bonds – are higher income families.

The student assistance appeals process is inadequately advertised and therefore, poorly understood, by many individuals that could benefit from engaging in this process.

The students assistance appeals process can be an invasive and emotionally challenging experience that may be unhealthy for individuals with health-related grounds for appeal.

The moderate standard of living assumption overestimates the parental contribution of some parents of dependent students.

The moderate standard of living assumption fails to consider important financial priorities including parental retirement savings, registered education savings for other children, and registered disability savings for any family member.

For married or common-law applicants, the financial contributions expected of a student's spouse are unrealistically large.

Married couples containing at least one person on student financial assistance are expected to live well below a moderate standard of living, as defined by the Canada Student Loans Program.

The student contribution assumptions fail to consider potentially important financial priorities including personal (and/or spousal) retirement savings, registered education savings for dependent children, and registered disability savings.

The maximum assistance amount is inequitable to students with the greatest financial need.

In spite of many positive changes to in-study financial assistance, the vast majority of post-secondary students in Nova Scotia continue to come from higher income backgrounds, as defined by student financial assistance policy itself.

Student loan repayment conditions and debt management programs available to student loan borrowers are poorly advertised and poorly understood by the student population.

The existing Debt Cap eligibility criteria exclude many post-secondary students from the benefits of this program, including all non-university students, graduate students, and professional students.

The 4-year limit on Debt Cap benefits is impractical relative to the actual time-to-completion for many students.

Post-study student financial assistance delivered through tax credits disproportionately benefits higher income students and families.

Post-study student financial assistance delivered through tax credits are poorly timed to assist students when they need financial help the most – while they are studying.

Post-study student financial assistance delivered through provincial refundable tax credits, in particular, are less generous and also redundant incentives to the analogous federal tax credits.

The Graduate Retention Rebate is an expensive and ineffective approach to youth retention and student financial assistance.

Be it resolved that *Students Nova Scotia* makes the following RECOMMENDATIONS:

The Province of Nova Scotia and all interested PSE stakeholders should join with *StudentsNS* to investigate the existing social barriers to PSE access and create a comprehensive strategy to eliminate these barriers, including a commitment to collecting and disseminating system-wide data on accessibility.

The Province should engage the federal government to encourage reinvestment of pre-study student financial assistance spending on programs that enhance accessibility and affordability for Nova Scotians. In particular, it should advocate that Nova Scotians receive a proportionate share of pre-study financial assistance investment, relative to the size of our population.

The Province of Nova Scotia should eliminate the Graduate Retention Rebate, the Tuition and Education Tax Credit, and the Student Loan Interest Tax Credit. All current and future cost savings should be reinvested in student financial assistance to improve accessibility and affordability of post-secondary education.

The Province of Nova Scotia should eliminate the limit on provincial student financial assistance, currently $180 per study week, for all SFA-eligible students studying at public institutions in Nova Scotia.

The Nova Scotia Student Assistance Program should develop and implement mechanisms to inform all students about the existing student assistance appeals process and to make the Higher Appeals Board more accessible to individuals across the Province.

In consultation with *StudentsNS* and representative students, the Nova Scotia Student Assistance Program should work to make the appeals/dispute resolution process as compassionate as possible for all students but in particular those individuals facing serious and verifiable health issues.

When assessing student assistance applications, the Nova Scotia Student Assistance Program's calculation of expected resources should give consideration to additional student and/or family costs, including, but not limited to, registered retirement savings and registered education savings for dependent children or registered disability savings for any family members. With appropriate documentation, an applicant's resources calculation should be reduced by the actual amounts contributed to a registered pension plan (RPP), registered retirement savings plan (RRSP), a registered education savings plan for a dependent child (RESP), and/or a registered disability savings plan (RDSP).

The cost allowances used by the Nova Scotia Student Assistance Program to calculate each applicant's available resources should be sufficient to allow all applicants (and/or their families) a similar standard of living, regardless of the applicant's student category.

The Province of Nova Scotia should develop and execute a public education campaign using moral suasion to inform parents about the costs of post-secondary education in Nova Scotia and educate them about the risks their children face without financial help.

The Province of Nova Scotia should provide supplementary student loans to dependent students with parents who cannot or will not contribute the expected funding to their child's education.

Together with *StudentsNS*, the Province of Nova Scotia should commit to studying its approach to debt relief for students repaying supplemental student loans.

The Province of Nova Scotia should develop an engaging and user-friendly informational web portal that clearly explains the essential features of the student assistance program, from application to repayment.

The Province of Nova Scotia should create an inter-departmental strategy for disseminating information about the student financial assistance program between the Department of Labour and Advanced Education and the Department of Education and Early Childhood Development. The key objective of this strategy should be to deliver timely, accurate information on post-secondary education and student financial assistance to students within Nova Scotia's public education system.

Students reliant on government loans to finance their education should be provided with all necessary information to better understand their potential debt burden throughout their program of studies. At a minimum, this should include a clear explanation of the total amount of repayable financial assistance being offered, a reminder of any existing debt the borrower already holds, and the expected terms of repayment based on the total estimated debt amount.

The Province of Nova Scotia should provide all provincial student financial assistance in the form of an up front grant for students studying at a public post-secondary institution in Nova Scotia.

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9. Appendices

The following appendices are available on our website http://studentsns.ca/research-policy/from-worst-to-first:

Appendix A: List of post-secondary institutions in Nova Scotia designated to receive students with government student loans and/or grants.

Appendix B: CSLP/NSSAP Program Tables used to calculate need (i.e. financial eligibility) for student financial assistance.

Appendix C: Statistics on RESP-buying behaviour of Nova Scotians.