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Archived: June 2, 2025 11:58:20 AM
From: [redacted] Représentants [redacted]
Sent: Thu, 13 Mar 2025 18:41:37
To
Cc: Immigration Representatives / Représentants immigration (IRCC)
Subject: FW: PAL requirement - DLI transfer before Nov 8 and levels of study - REP-2025-0483 - Due 12-Mar-25
Importance: Normal
Sensitivity: None

Good day,

[redacted] Please note that the information provided serves as general program guidance and should not be considered a directive for case-specific inquiries.

QUESTION

am reaching out to seek clarification regarding the Provincial Attestation Letter requirements for study permit extensions.

The IRCC website states that students are exempt from requiring a PAL if they are applying for a "study permit extension at the same DLI and level of study as your current study permit".

However, we need further clarification regarding students who transferred to our institution before November 8, 2024, and have been studying with us since then. These students were reported as affiliated with our DLI through DLI compliance [redacted] their original study permits were [redacted] for [redacted] their study permits [redacted] not [redacted] indicate the name of the DLI.

Given that PALs are intended to regulate the intake of new students, it seems these students—who have already been studying with us for over a year—should not require a PAL.

However, based on the exemption criteria referencing the "same DLI as your current study permit," there is uncertainty about whether these students are subject to this requirement.

Could you please confirm whether the previously transferred students will need a PAL when extending their study permits?

Furthermore, we would appreciate clarification on how IRCC defines "levels of study." There are multiple ways to interpret this, as both 1-year Certificate programs and 2-year Diploma programs fall under post-secondary education but may also be considered as separate levels. Similarly, post-diploma programs could either be classified as the same post-secondary level or as a new level of study. Could you provide guidance on how IRCC distinguishes between different levels of study for PAL exemption purposes?

RESPONSE

Immigration, Refugees and Citizenship Canada | Immigration, Réfugiés et Citoyenneté Canada
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Students who transferred to your DLI before November 8, 2024, and updated IRCC, do not need to submit a Provincial Attestation Letter (PAL) when applying for a study permit extension at the same level of study. They can continue their studies at the same DLI as long as they meet the conditions of their permit.

However, if a student did not notify IRCC of their transfer before November 8, 2024, their study permit remains linked to their previous DLI. In this case, they must submit a PAL with their extension application, as per the new regulations.

Additionally, if these students wish to transfer to a different DLI in the future, they will need to apply for a new study permit extension and submit a new PAL.

Starting January 22, 2025, students applying for a study permit extension will be exempt from providing a PAL/TAL if they stay at the same DLI and remain at the same level of study. The levels of study are defined by IRCC as follows:

- Primary and secondary education
- Post-secondary education (including vocational training, technical programs, and undergraduate degrees)
- Graduate education or above

The exemption applies when students change programs within the same DLI, provided they remain within the same level of study (e.g., switching between undergraduate programs or moving from a certificate to a diploma - Credentials). If a student moves to a different level of study (e.g., from undergraduate to graduate), a new PAL/TAL is required, even if they stay at the same institution. They will need to provide proof that they meet one of the exceptions if they do not provide a PAL/TAL with their application.

For more detailed information, please refer to the official IRCC websites:

- Changing your school or program - Canada.ca
- Study permit: Get the right documents Provincial attestation letter or territorial attestation letter - Canada.ca
- Ministerial Instructions

We trust that this information will assist you.

[redacted]

The Immigration Representatives Mailbox

From:
Sent: [redacted] 11, 2025 12:27 PM
To: Immigration Representatives / Représentants immigration (IRCC) <IRCC.ImmigrationRepresentatives-[redacted]@cic.gc.ca>
Subject: PAL requirement - DLI transfer before Nov 8 and levels of study

[redacted]

I hope this email finds you well.

I am reaching out to seek clarification regarding the Provincial Attestation Letter requirements for study permit extensions.

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The IRCC website states that students are exempt from requiring a PAL if they are applying for a "**study permit extension at the same DLI and level of study as your current study permit**".

However, we need further clarification regarding students who transferred to our institution before November 8, 2024, and have been studying with us since then. These students were reported as affiliated with our DLI through DLI compliance reporting, yet their original study [redacted]rmits were issued for [redacted] different [redacted] their study permi[redacted] not [redacted] the name [redacted] the DLI.

Given that PALs are intended to regulate the intake of new students, it seems these students—who have already been studying with us for over a year—should not require a PAL.

However, based on the exemption criteria referencing the "same DLI as your current study permit," there is uncertainty about whether these students are subject to this requirement.

Could you please confirm whether the previously transferred students will need a PAL when extending their study permits?

Furthermore, we would appreciate clarification on how IRCC defines "levels of study." There are multiple ways to interpret this, as both 1-year Certificate programs and 2-year Diploma programs fall under post-secondary education but may also be considered as separate levels. Similarly, post-diploma programs could either be classified as the same post-secondary level or as a new level of study. Could you provide guidance on how IRCC distinguishes between different levels of study for PAL exemption purposes?

We appreciate your guidance on these matters.

Thank you,