



Ontario Confederation of University Faculty Associations
Union des Associations des Professeurs des Universités de l'Ontario

Bonnie Lysyk
Auditor General of Ontario
Office of the Auditor General of Ontario
20 Dundas Street West, Suite 1530
Toronto, Ontario M5G 2C2

Dear Ms. Lysyk,

I am writing to express the concern of the Ontario Confederation of University Faculty Associations (OCUFA) with your recent report on the Ontario Student Assistance Program (OSAP). Our concerns are both substantive and procedural.

Your assertion that there are only two per cent more students attending college or university because of the grant is not helpful for a number of reasons. The stated goal of the grant is to increase access for low-income students. In order to properly measure the efficacy of this expenditure you would need to disaggregate the data to determine if the proportion of low-income students has increased. As importantly, the time series you are using is poor practice in policy analysis – particularly an analysis of this type that is best suited for longitudinal study. The period usually allotted to such programs is 5 to 10 years, not the limited 12 months of data you have relied upon.

It is important to note programs like OSAP operate as both financial assistance and as a long-term policy lever to shift the perceptions and expectations of low-income families. Debt aversion is a well-documented barrier to postsecondary education and there is ample evidence to suggest that, in the long term, increased non-repayable assistance is the best means to remove this barrier. In other words, part of the long-term goal of OSAP is to change the culture of who attends postsecondary institutions and to break down long-standing financial and psychological barriers that keep low-income students from gaining a postsecondary education. As noted, it is poor public policy practice to evaluate a long-term policy goal based on 12 months of data.

In addition, you gloss over one of the defining equity policy goals of the program: to reduce the student debt of those students forced to borrow. The design of the program was specifically engineered to address the fact that Ontario has been a national laggard when it came to non-repayable student financial assistance. The previous government took the position that the high levels of student debt prevalent among low income students was an equity issue that ought to be remediated. Though you criticize the program for higher than anticipated uptake, if one were auditing the program on the basis of whether or not it achieved its stated policy goals, increased uptake would surely count as a positive. Because the program is income tested one could infer that students from low income families are

incurring lower levels of student debt. None of these nuances are captured in your attempt to evaluate the policy.

Our procedural concern is rooted in what we perceive to be your analysis of an area outside of your jurisdiction and expertise. While we acknowledge your jurisdiction and expertise in auditing and value-for-dollar analysis, this report veers heavily into policy analysis as outlined in our concerns set out above. It is our view that this analysis is outside of your purview and encroaches on a policy debate best left to elected representatives, academic and policy experts, and the representative communities affected by the policy. In short, our view is that you have offered a political pronouncement rather than an expert opinion rooted in the principles of value-for-dollar auditing.

Our concern is grounded in the fact that your office is held in high regard by the public and policymakers and it is particularly concerning when you use your office to pronounce on policy areas in a manner that is inaccurate and outside your jurisdiction and field of expertise.

We would be happy to discuss these concerns with you in person.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Gyllian Phillips', written in a cursive style.

Gyllian Phillips
President
Ontario Confederation of University Faculty Associations