

## **Financial Statements**

# Immigrant Services Association of Nova Scotia

March 31, 2023

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### Independent auditor's report

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To the Board of Directors of Immigrant Services Association of Nova Scotia

#### Opinion

We have audited the financial statements of Immigrant Services Association of Nova Scotia (the "Association"), which comprise the statement of financial position as at March 31, 2023, and the statements of operations, changes in net assets and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of Immigrant Services Association of Nova Scotia as at March 31, 2023, and its results of its operations and its cash flows for the year then ended in accordance with Canadian accounting standards for not-for-profit organizations.

#### **Basis for Opinion**

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Association in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Canadian accounting standards for not-for-profit organizations, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Association's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Association or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Association's financial reporting process.

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#### Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to
  fraud or error, design and perform audit procedures responsive to those risks, and obtain audit
  evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting
  a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may
  involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal
  control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Association's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting
  and, based on the audit evidence obtained, whether a material uncertainty exists related to events or
  conditions that may cast significant doubt on the Association's ability to continue as a going concern.
  If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's
  report to the related disclosures in the financial statements or, if such disclosures are inadequate, to
  modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our
  auditor's report. However, future events or conditions may cause the Association to cease to continue
  as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Grant Thornton LLP

**Chartered Professional Accountants** 

Halifax, Canada June 5, 2023

March 31	2023	2022
Assets		
Current		
Cash and cash equivalents	\$ 6,709,148	\$ 6,088,217
Receivables (Note 3)	1,445,122	502,993
	8,154,270	6,591,210
Investments in GICs (Note 4)	1,381,718	-
Restricted cash for funds held in trust	2,447,084	2,346,507
Capital assets (Note 5)	339,932	422,763
	\$ 12,323,004	\$ 9,360,480
	· <u> </u>	
Liabilities Current Payables and accruals (Note 6) Payable to funders Current portion of funds held in trust (Note 8) Deferred contributions (Note 7)	\$	\$ 468,733 - - - - - - - - - - - - - - - - - -
Funds held in trust (Note 8)	<u>1,563,919</u> <u>6,148,337</u>	<u>2,346,507</u> <u>4,602,745</u>
Net assets		
Internally restricted net assets	5,924,667	1,933,402
Unrestricted net assets	250,000	2,824,333
	<u>6,174,667</u>	4,757,735
	\$ 12,323,004	\$ 9,360,480

# Immigrant Services Association of Nova Scotia Statement of financial position

Commitments (Note 9) Guarantees (Note 10)

On behalf of the Board

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Director

Jumetus Witts

Director

Statement of operations Year ended March 31	2023	2022
Revenues		
Contributions		
Federally funded programs	\$ 29,172,059	\$ 19,988,804
Provincially funded programs	6,192,997	5,624,039
Other sources funded programs	1,233,693	1,061,974
Interest revenue	164,056	39,987
Miscellaneous revenue	<u> </u>	267,505
	36,850,372	26,982,309
Expenses		
Amortization of capital assets	303,810	420,457
Computer related expenses	39,689	85,254
HSTexpense	647,362	351,458
Marketing and communications	76,105	18,044
Outsourced program delivery	2,160,367	2,080,576
Overhead costs	1,173,945	414,848
Professional development	123,076	127,843
Professional fees	619,434	311,556
Program delivery	9,228,326	3,393,134
Rent expense	1,685,237	1,642,246
Salaries and benefits	19,288,304	16,748,429
Travel	87,785	145,157
	35,433,440	25,739,002
Excess of revenues over expenses	\$ 1,416,932	\$ 1,243,307

### Immigrant Services Association of Nova Scotia Statement of operations

### Immigrant Services Association of Nova Scotia Statement of changes in net assets

Year ended March 31

					Internally res	stricted	net assets			
		Unrestricted Operational Fund	Restricted Operational Fund	S	Private ponsorship ISANS Assurance Fund		Reserve Fund	Refugee Emergency Fund	2023 Total	2022 Total
Net assets, beginning of year	\$	2,824,333	\$ -	\$	385,441	\$	1,305,104	\$ 242,857	\$ 4,757,735	\$ 3,514,428
Inter-fund transfer (Not	e 2)	(3,981,940)	3,816,940		-		165,000	-	-	-
Excess (deficiency) of over expenses		1,407,607	 		9,821		33,957	 (34,453)	 1,416,932	 1,243,307
Net assets, end of year	\$	250,000	\$ 3,816,940	\$	395,262	\$	1,504,061	\$ 208,404	\$ 6,174,667	\$ 4,757,735

Immigrant Services Association of I	Nova Scotia	l
Statement of cash flows Year ended March 31	2023	2022
Increase in cash and cash equivalents		
<b>Cash from operating activities</b> Excess of revenues over expenses Amortization of capital assets	\$ 1,416,932 <u>303,810</u> 1,720,742	\$ 1,243,307 <u>420,457</u> 1,663,764
Change in non-cash operating working capital Receivables Restricted cash for funds held in trust Payables and accruals Payable to funders Deferred contributions	(942,129) (100,577) 85,352 1,157,329 <u>202,334</u> 2,123,051	(144,594) 149,223 (118,280) - <u>347,030</u> <u>1,897,143</u>
<b>Cash from investing activities</b> Purchase of capital assets, net Purchases (net of redemption) of investments in GICs	(220,979) <u>(1,381,718)</u> <u>(1,602,697</u> )	(409,715) <u>565,598</u> 155,883
<b>Cash from financing activities</b> Funds held in trust for Career Pathway Funds held in trust for Private Refugee Sponsorship Funds held in trust for Foreign Credentials Recognition	(40,789) <u>141,366</u> 100,577	2,483 18,731 <u>(170,437</u> ) <u>(149,223</u> )
Net increase in cash and cash equivalents	620,931	1,903,803
Cash and cash equivalents Beginning of year	6,088,217	4,184,414
End of year	\$ 6,709,148	\$ 6,088,217

# Immigrant Sorvices Association of Nova Scotia

March 31, 2023

#### 1. Purpose of organization

Immigrant Services Association of Nova Scotia's (the "Association") mission is helping immigrants build a future in Nova Scotia. The Association is the leading deliverer of settlement services in Atlantic Canada, and provides a full range of services and programs along the settlement and integration continuum. The organization serves 11,000 plus clients annually, in over 100 communities across the province. The Association is the primary contact in Nova Scotia on refugee, settlement and immigration issues, for more than 2,000 organizations, employers, government departments and individuals.

Using a client-centered approach, the Association provides integrated and holistic services to immigrants, from refugee resettlement to professional programs, from family counselling to English in the Workplace. The Association offers services in an inclusive manner, respectful of, and sensitive to, diversity. The Association makes partnership, professionalism and accountability a priority in every aspect of their work.

As the first stop for immigrant services, the Association offers many advantages to clients. Individuals and families receive support in all aspects of their new lives. The services help reduce confusion and anxiety in the early days of settlement. The Association works in a multi-ethnic setting and provides clients with social networks that extend beyond ethnic communities.

The Association is a non-profit organization under paragraph 149(1)(I) of the Income Tax Act and, as such, is not subject to Federal or Provincial income taxes. Any accumulated net assets are to be used in promoting the Association's objectives and at no time will any dividends be paid.

### 2. Summary of significant accounting policies Basis of accounting

These financial statements have been prepared in accordance with Canadian accounting standards for not-for-profit organizations ("ASNPO") and include the following significant accounting policies.

#### Fund accounting

The Association uses fund accounting and, accordingly, resources are classified for accounting purposes into funds based on specific activities or objectives. This method recognizes the limitations and restrictions placed on the use of resources available to the Association by classifying all transactions according to their nature. The following funds are being utilized:

#### Unrestricted Operational Fund

The Board of Directors established the Unrestricted Operational Fund to offset operating budget shortfalls, to manage temporary cash flow and funding shortages, and general operation costs not eligible for program funding. Transfers from the Restricted Operational Fund provide top-ups to this account. The Board has authorised the CEO to utilise these funds for operations.

#### Restricted Operational Fund

Effective May 26, 2022, the Board of Directors established the Restricted Operational Fund to manage the risk of temporary cash flow and funding shortages, and to cover the general operation costs that are not eligible for program funding. Any surplus from current year operations accrues to this fund net of approved annual transfers to the other ISANS funds. Any draw-down from this fund must be approved by the Board of Directors. During the year, \$3,816,940 was transferred from the Unrestricted Operational Fund to establish this fund for the first time.

March 31, 2023

#### 2. Summary of significant accounting policies (continued)

#### Fund accounting (continued)

#### Private Sponsorship ISANS Assurance Fund

The Board of Directors directed that the profits made from the sale of property be used to create a Private Sponsorship ISANS Assurance Fund. The Private Sponsorship ISANS Assurance Fund is to secure the responsibilities of the Association in assisting the sponsorship of refugees in Nova Scotia as a Sponsorship Agreement Holder. Approval of the Board of Directors is required to expend these funds.

#### Reserve Fund

The Board of Directors directed that a Reserve Fund be established in case of the loss of one or more of its major funding sources. Approval of the Board of Directors is required to expend these funds. During the year, \$165,000 was transferred from the Unrestricted Operational Fund to increase the Reserve Fund.

#### Refugee Emergency Fund

The Board of Directors established a Refugee Emergency Fund to provide support to refugee clients who have special and/or emergency needs in the case that the costs are not eligible for the IRCC Resettlement Assistance Program.

#### Cash and cash equivalents

Cash and cash equivalents include cash on hand, balances with banks, and term deposits with maturity dates within one year.

#### Restricted cash for funds held in trust

Restricted cash for funds held in trust consists of balances invested in GICs which are held in trust by the Association for specific programs and projects.

#### **Capital assets**

Capital assets are recorded at cost, net of taxes. Contributed assets are recorded at the fair market value at the date of contribution. Capital assets are amortized on a straight-line basis over the estimated useful life of the assets as follows:

Office furniture and equipment	5 years
Computer hardware	3 years
Computer software	2 years

When events or changes in circumstances indicate a capital asset no longer has any long term service potential to the Association, the excess of its net carrying amount over any residual value would be recognized as an expense. Such a write-down is not reversed if the service potential subsequently improves.

#### Investments in GICs

The Association has investments in GICs with maturity greater than one year. These are accounted for at fair value. Changes in fair value are recorded in net income.

March 31, 2023

#### 2. Summary of significant accounting policies (continued)

#### **Revenue recognition**

The Association follows the deferral method of accounting for contributions. Restricted contributions are recognized as revenue in the year in which the related expenses are incurred. Unrestricted contributions are recognized as revenue when received or receivable if the amount can be reasonably estimated and collection is reasonably assured.

Interest and miscellaneous revenue are recognized when earned and measurement and collectability are reasonably assured.

#### Contributed materials and services

Contributed materials and services are recorded by the Association when a fair value can be reasonably estimated and when the materials and services are normally purchased by the Association and would be paid for if not donated.

The work of the Association is dependent upon the service of over 319 (2022 - 258) volunteers filling two identifiable volunteer roles at the Association. The value of these services is not recognized in these financial statements. It is estimated that in excess of 6,651 (2022 - 7,464) hours have been donated.

#### **Financial instruments**

The Association considers any contract creating a financial asset, liability or equity instrument as a financial instrument, except in limited circumstances. The Association accounts for the following as financial instruments:

- Cash and cash equivalents
- Receivables
- Investments in GICs
- Payables and accruals
- Funds held in trust

A financial asset or liability is recognized when the Association becomes party to contractual provisions of the instrument.

The Association initially measures its financial assets and financial liabilities at fair value, except for certain non-arm's length transactions.

Financial assets and financial liabilities obtained in related party transactions are initially measured at cost, with the exception of certain instruments which are initially measured at fair value. The Association does not have any financial assets or financial liabilities in related party transactions which are initially measured at fair value.

Gains or losses arising on initial measurement differences are generally recognized in net income when the transaction is in the normal course of operations, and in equity when the transaction is not in the normal course of operations, subject to certain exceptions.

March 31, 2023

#### 2. Summary of significant accounting policies (continued)

#### Financial instruments (continued)

Financial assets and financial liabilities recognized in related party transactions are subsequently measured based on how the Association initially measured the instrument. Financial instruments initially measured at cost are subsequently measured at cost, less any impairment for financial assets. Financial instruments initially measured at fair value, of which the Association has none, would be subsequently measured at amortized cost or fair value based on certain conditions.

The Association subsequently measures its financial assets and financial liabilities at amortized cost, with the exception of investments in GICs which are recorded at fair market value. The Association removes financial liabilities, or a portion of, when the obligation is discharged, cancelled or expires. All changes in fair market value of the Association's investments in GICs are recorded in the statement of operations.

Financial assets measured at cost are tested for impairment when there are indicators of impairment. Previously recognized impairment losses are reversed to the extent of the improvement provided the asset is not carried at an amount, at the date of the reversal, greater than the amount that would have been the carrying amount had no impairment loss been recognized previously. The amounts of any write-downs or reversals are recognized in net income.

The Association is exposed to some risks through its financial instruments. The following analysis provides a measure of the Association's risk exposure and concentrations as at March 31, 2023.

a) Credit risk

Credit risk is the risk of financial loss to the Association if a debtor fails to make payments when due. The Association is exposed to this risk relating to its receivables. Management closely evaluates the collectability of its receivables which are assessed on a regular basis. There was no significant change in exposure from the prior year.

b) Liquidity risk

Liquidity risk is the risk that the Association will encounter difficulty in meeting the obligations associated with its financial liabilities. The Association is exposed to this risk mainly in respect of its payables and accruals. In the opinion of management, the liquidity risk to the Association is low and not material. There was no significant change in exposure from the prior year.

c) Market risk

Market risk is the risk that the fair value or expected future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises three types of risk: currency risk, interest rate risk, and other price risk. The Association is mainly exposed to interest rate risk. Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Association is exposed to interest rate risk on its investments in GICs. In the opinion of management, the interest rate risk to the Association is low and not material. There was no significant change in exposure from the prior year.

March 31, 2023

#### 2. Summary of significant accounting policies (continued)

#### **Financial instruments (continued)**

#### Use of estimates

Management reviews the carrying amounts of items in the financial statements at each statement of financial position date to assess the need for revision or any possibility of impairment. Many items in the preparation of these financial statements require management's best estimate. Management determines these estimates based on assumptions that reflect the most probable set of economic conditions and planned courses of action. These estimates are reviewed periodically and adjustments are made to net income as appropriate in the year they become known. Items subject to significant management estimates include useful life of capital assets and the allowance for doubtful accounts.

3. Receivables	<u>2023</u>	<u>2022</u>
Accounts receivable Contributions receivable HST receivable	\$  120,575 820,885 503,662	\$     9,668 225,966 <u>267,359</u>
	\$1,445,122	\$ 502,993

#### 4. Investments in GICs

			Maturity		
<u>GIC</u>	<u>Interest</u>	Terms	date	<u>2023</u>	<u>2022</u>
Number 50	1.750%	Cashable	29/Mar/24	\$ 72,687	\$-
Number 50	0.750%	Cashable	29/Mar/23	-	198,313
Number 51	1.750%	Cashable	29/Mar/24	175,000	-
Number 51	0.750%	Cashable	29/Mar/23	-	175,000
Number 52	1.750%	Cashable	29/Mar/24	175,000	-
Number 52	0.750%	Cashable	29/Mar/23	-	175,000
Number 70	0.350%	Cashable	26/May/22	-	750,000
Number 71	0.350%	Cashable	26/May/22	-	750,000
Number 72	0.350%	Cashable	26/May/22	-	750,000
Number 74	0.500%	Cashable	25/Aug/22	-	750,000
Number 86	4.450%	Cashable	16/Dec/23	5,250,000	-
Number 1C9PRW	2.570%	Non redeemable	05/Dec/22	-	580,092
Number 1 ZT3WF	3.750%	Non redeemable	19/Dec/23	595,906	-
Number 1TPGXM	0.310%	Cashable	06/Oct/22	-	385,080
Number 1V6545	0.360%	Cashable	14/Dec/22	-	420,489
Number 1TPGXS	0.310%	Cashable	06/Oct/22	-	281,942
Number 1TPGXC	0.310%	Cashable	06/Oct/22	-	259,443
Number 1X9K9G	3.000%	Cashable	27/May/24	395,010	-
Number 1X9K8R	3.000%	Cashable	27/May/24	431,359	-
Number 1X9KC2	3.000%	Cashable	27/May/24	289,215	-
Number 1TPGXC	3.000%	Cashable	27/May/24	266,134	
				7,650,311	5,475,359

March 31, 2023

#### 4. Investments in GICs (continued)

Less portion included in restrict Less current portion included in Long term investments in GICs	(2,447,084) <u>(3,821,509</u> ) \$ <u>1,381,718</u>	(2,346,507) ( <u>3,128,852</u> ) \$		
5. <b>Capital assets</b> Office furniture and equipment	<u>Cost</u> \$ 416,410	Accumulated Amortization \$ 304,726	2023 Net <u>Book Value</u> \$ 111,684	2022 Net <u>Book value</u> \$ 166,514
Computer hardware Computer software	619,677 <u>27,938</u> \$1,064,025	391,429 27,938 \$ 724,093	228,248  \$ 339,932	242,280 <u>13,969</u> \$ 422,763
6. Payables and accruals			<u>2023</u>	2022
Payables and accruals Accrued severance payable	\$    554,085 	\$ 403,733 <u>65,000</u>		
		<u>\$    554,085</u>	\$ 468,733	
7. Deferred contributions			<u>2023</u>	2022
Federal government Employment and Social Develor Foreign Credential Recogniti Immigrant Youth Employabili AICLF Highly Skilled Immigrant Acc	on Program ty Project		\$ 230,922 45,226 55,703 23,389	\$ 50,502 77,973 - 113,844
IRCC Refugee Resettlement Servio Language Skills RAP	52,128 36,046 96,934	88,040 - -		
Provincial government Province of Nova Scotia – Depa Advanced Education Employment Counselling (Management) Personal Care Workers a International Medical Gra	77,369	89,013 87,473		
Internationally Educated Orientation Program		•	-	51,664 223,942

March 31, 2023

7. Deferred contributions (continued)	<u>2023</u>	2022
Province of Nova Scotia – Apprenticeship Agency Nova Scotia Apprenticeship Agency	602,910	-
Province of Nova Scotia – Health and Wellness Covid-19 Mental Health	12,006	13,517
Province of Nova Scotia – Department of Community Services Moving Towards Success Project Province of Nova Scotia – Office of Immigration and Population Growth	-	64,685
Work Placement Project	-	24,000
Other	411,557	441,579
	\$ 1,989,839	\$ 1,787,505
8. Funds held in trust	<u>2023</u>	2022
Career Pathway Fund Project		
Career Pathway Fund Project Loan provides loan guarantees to Internationally Trained Workers that allow them to obtain the necessary skills and training to undertake their chosen profession in Canada. The program provides security of 80% of the loan amount. The funds have been segregated from other funds held by the Association and have been invested in GICs and designated as restricted cash for funds held in trust. On July 8, 2022, Employment and Social Development Canada approved all remaining funds from loan loss reserve can be withdrawn to be used for the purpose of International Trained Workers Program. Balance, beginning of year		\$ 352,469
to Internationally Trained Workers that allow them to obtain the necessary skills and training to undertake their chosen profession in Canada. The program provides security of 80% of the loan amount. The funds have been segregated from other funds held by the Association and have been invested in GICs and designated as restricted cash for funds held in trust. On July 8, 2022, Employment and Social Development Canada approved all remaining funds from loan loss reserve can be withdrawn to be used for the purpose of International Trained	I	\$ 352,469 (172,517) <u>175,000</u>

March 31, 2023

8. Funds held in trust (continued)	<u>2023</u>	2022
Foreign Credentials Recognition Program The Foreign Credentials Recognition Program provides loan guarantees to Internationally Trained Individuals to support them through the Foreign Credentials Recognition process in Canada. The program provides security of 50% of the loan amount. The funds have been segregated from other funds held by the Association and have been invested in GICs and designated as restricted cash for funds held in trust.	1	
Balance, beginning of year Transfer to Career Pathway Fund Project Contributions Interest	\$ 1,713,792 - 100,000 <u>41,366</u>	\$ 1,884,229 (175,000) - 4,563
Balance, end of year	1,855,158	1,713,792
<b>Private Refugee Sponsorship Fund</b> The Association received funds from constituent groups for the purpose of sponsoring refugees to come to Canada. The funds are disbursed under the direction of the sponsors for private refugee sponsorship purpose. The direct bank fees are deducted from the funds received.		
The funds have been segregated from other funds held by the Association and have been invested in GICs and designated as restricted cash for funds held in trust.		
Balance, beginning of year Additional funds received in trust Fund disbursement to the refugees on behalf of the sponsors	277,763 - <u>(40,789</u> )	259,032 49,810 <u>(31,079</u> )
Balance, end of year	236,974	277,763
Total funds held in trust	2,447,084	2,346,507
Less current portion of funds help in trust	(883,165)	
Long term funds held in trust	<u>\$ 1,563,919</u>	<u>\$ 2,346,507</u>

#### 9. Commitments

The Association has a rental commitment for office space and equipment in the following amounts:

2024	\$ 1,692,894	
2025	1,639,897	,
2026	1,648,070	
2027	1,643,951	
2028	388,072	2

March 31, 2023

#### 10. Guarantees

On September 22, 2012, the Association had entered into an agreement with the ESDC (HRSDC) and the Royal Bank of Canada (RBC) to provide loan guarantees under the Career Pathway Fund Project, as discussed in Note 8, with guarantee and cash collateral agreements collectively known as Security Agreements. As at March 31, 2023, \$35,209 (2022 - \$68,737) in guarantees have been provided under this program.

On September 28, 2018, the Association entered into an additional program with the ESDC and RBC to provide loan guarantees under the Foreign Credentials Recognition Program which is also disclosed in Note 8. As at March 31, 2023, \$288,482 (2022 - \$273,819) in guarantees have been provided under this program.