



HOUSE OF COMMONS
CHAMBRE DES COMMUNES
CANADA

MODERNIZATION OF CLIENT SERVICE DELIVERY

Report of the Standing Committee on Citizenship and Immigration

**Borys Wrzesnewskyj
Chair**

MARCH 2017

42nd PARLIAMENT, 1st SESSION

Published under the authority of the Speaker of the House of Commons

SPEAKER'S PERMISSION

Reproduction of the proceedings of the House of Commons and its Committees, in whole or in part and in any medium, is hereby permitted provided that the reproduction is accurate and is not presented as official. This permission does not extend to reproduction, distribution or use for commercial purpose of financial gain. Reproduction or use outside this permission or without authorization may be treated as copyright infringement in accordance with the *Copyright Act*. Authorization may be obtained on written application to the Office of the Speaker of the House of Commons.

Reproduction in accordance with this permission does not constitute publication under the authority of the House of Commons. The absolute privilege that applies to the proceedings of the House of Commons does not extend to these permitted reproductions. Where a reproduction includes briefs to a Standing Committee of the House of Commons, authorization for reproduction may be required from the authors in accordance with the *Copyright Act*.

Nothing in this permission abrogates or derogates from the privileges, powers, immunities and rights of the House of Commons and its Committees. For greater certainty, this permission does not affect the prohibition against impeaching or questioning the proceedings of the House of Commons in courts or otherwise. The House of Commons retains the right and privilege to find users in contempt of Parliament if a reproduction or use is not in accordance with this permission.

Also available on the Parliament of Canada Web Site
at the following address: <http://www.parl.gc.ca>

MODERNIZATION OF CLIENT SERVICE DELIVERY

Report of the Standing Committee on Citizenship and Immigration

**Borys Wrzesnewskyj
Chair**

MARCH 2017

42nd PARLIAMENT, 1st SESSION

STANDING COMMITTEE ON CITIZENSHIP AND IMMIGRATION

CHAIR

Borys Wrzesnewskyj

VICE-CHAIRS

David Tilson

Jenny Kwan

MEMBERS

Gary Anandasangaree

Julie Dzerowicz

Hon. Michelle Rempel

Randeep Sarai

Bob Saroya

Marwan Tabbara

Salma Zahid

OTHER MEMBERS OF PARLIAMENT WHO PARTICIPATED

Don Davies

Ali Ehsassi

Jacques Gourde

Rachael Harder

Iqra Khalid

Darshan Singh Kang

Sonia Sidhu

CLERK OF THE COMMITTEE

Erica Pereira

LIBRARY OF PARLIAMENT

Parliamentary Information and Research Service

Sandra Elgersma

Julie Béchard

THE STANDING COMMITTEE ON CITIZENSHIP AND IMMIGRATION

has the honour to present its

NINTH REPORT

Pursuant to its mandate under Standing Order 108(2) and the motion adopted by the Committee on Tuesday, October 4, 2016, the Committee has studied the modernization of client service delivery and has agreed to report the following:

TABLE OF CONTENTS

PREAMBLE.....	1
INTRODUCTION	2
BACKGROUND	2
A. Ongoing efforts to modernize client service delivery	2
B. Recent changes at IRCC	4
ISSUES BROUGHT TO THE COMMITTEE’S ATTENTION	5
A. The Call Centre	5
B. Departmental website and online applications	7
1. A website accessible to all.....	7
2. Online applications	7
3. Status updates	8
4. Innovation for the future.....	9
C. Returns and refusals	10
D. Facilitating access for non-English/French speakers	11
E. Opportunities for in-person service	11
F. Processing times and service standards	12
G. Fees.....	13
H. Customer service from other government departments	13
CONCLUSION AND RECOMMENDATIONS	14
LIST OF RECOMMENDATIONS	21
APPENDIX A: LIST OF WITNESSES	25
APPENDIX B: LIST OF BRIEFS	27
REQUEST FOR GOVERNMENT RESPONSE	29
DISSENTING OPINION OF THE NEW DEMOCRATIC PARTY OF CANADA.....	31

PREAMBLE

On 4 October 2016, the House of Commons Standing Committee on Citizenship and Immigration (the Committee) passed a motion to study the modernization of client service delivery at Immigration, Refugees and Citizenship Canada (IRCC).¹ A second motion, adopted on 24 November 2016, specified that the study include consideration, *inter alia*, of the following areas: technology; front line workers; the private sector; and third party suppliers.² The Committee heard from 14 witnesses during three meetings held 8 December 2016, 13 December 2016 and 1 February 2017 and it also received [written submissions](#).

1 Standing Committee on Citizenship and Immigration [CIMM], [Minutes of Proceedings](#), 4 October 2016.

2 CIMM, [Minutes of Proceedings](#), 24 November 2016.

INTRODUCTION

In 2016, Immigration, Refugees and Citizenship Canada (IRCC) handled over two million temporary resident applications and customer service interactions many times that number as people obtained instructions and submitted and followed up on applications. IRCC's clients include prospective visitors and immigrants, employers and sponsors in Canada, lawyers and consultants (known as authorized representatives), as well as permanent residents seeking citizenship and citizens seeking passports.

The modernization of client service delivery is identified as a priority by IRCC.³ According to its 2016 Departmental Performance Report, the department seeks to achieve this modernization objective through continuous innovation geared at improving services, reducing processing times and meeting service standards, while also gaining efficiencies and maintaining program integrity. Efforts in this regard are focused largely on permanent and temporary immigration, as well as on the citizenship and the passport programs.

Current priorities for client service modernization at IRCC, across all lines of business, include using innovative processes that make sense to clients, providing clients with greater assurance that their case is moving forward and listening to clients through surveys, feedback forms and complaint mechanisms.⁴

This report begins with an overview of IRCC's major initiatives to modernize client service delivery, including recent changes. The next section of the report identifies the various issues with client service that were brought to the Committee's attention by a range of witnesses, including lawyers, immigration consultants, groups that work with refugees as well as a representative from the private sector. An official from the Australian government also provided insight as to client service delivery operations within his mandate. The final part of this report concludes with the Committee's recommendations for improving client service delivery.

BACKGROUND

A. Ongoing efforts to modernize client service delivery

The use of technology is at the forefront of IRCC's modernization initiative. Within IRCC, the development of the Global Case Management System (GCMS), which allows the department to move from processing paper applications to using electronic applications, has yielded significant benefits in processing efficiencies. Other changes include the establishment of Express Entry to manage intake for most economic streams of immigration and the expanded network of visa application centres (VACs), where applicants can get personalized service.

3 Immigration, Refugees and Citizenship Canada [IRCC], [Departmental Performance Report for the period ending March 31, 2016](#), p. 16.

4 CIMM, [Evidence](#), 42nd Parliament, 1st session, Meeting No. 44, 8 December 2016, 1530 (Robert Orr, Assistant Deputy Minister, Operations, Department of Citizenship and Immigration).

The GCMS is an electronic business platform. It constitutes one of the major projects undertaken to modify IRCC's service delivery model and is described as "an automated, integrated case management tool to support [IRCC's] global business network."⁵ GCMS allows files to be transferred electronically, a feature that is helpful when there are huge spikes in demand in a specific office. The ability to process applications anywhere in the world has also allowed the department to triage files and separate the complex from the non-complex cases. Non-complex cases may be processed entirely in Canada, thereby freeing visa officers to concentrate resources on more complex cases. Paul Armstrong of IRCC explained that triaging applications allowed 56% of parent and grandparent sponsorship files to be processed in Canada last year.⁶ The only line of business not integrated into GCMS at this time is the Passport Program, which is slowly being migrated into GCMS.⁷

Another significant development in customer service at IRCC was the creation of the network of VACs.⁸ These centres receive applications for temporary resident visas, collect biometric information, offer information in the local language of the applicant and ensure that files are complete before being forwarded to a visa officer for a final decision. There are 132 VACs in 94 countries that provide services for IRCC.⁹

The Express Entry program was launched in January 2015 and is entirely online. Immigration applicants in economic streams first apply with an expression of interest: they are then ranked for their human capital and placed in a pool of candidates. At regular intervals, IRCC announces that a certain number of invitations to submit full applications pertaining to a particular economic stream have been issued. IRCC processes these applications within a six-month time frame.

The IRCC website and Call Centre are important aspects of client interaction with the department. The website has form-fillable PDF files for each type of permanent resident application, as well as an application guide meant to assist with the process. Applications for all temporary resident lines of business, as well as Express Entry, may be completed fully online. Applicants can verify the status of their application through the "Check my status tool" (eCAS) and "My Account". According to department officials, recent innovations to the website include the "Come to Canada" wizard, the online Help Centre and the addition of Google Search capability and a processing times calculator.¹⁰ Earlier in 2016, IRCC also released a new function called "link my application" that allows clients

5 IRCC, "[Status Report on Major Crown Projects/Transformational Projects](#)," *Departmental Performance Report for the period ending March 31, 2010*.

6 CIMM, [Evidence](#), 8 December 2016, 1620 (Paul Armstrong, Director General, Centralized Network, Department of Citizenship and Immigration).

7 CIMM, [Evidence](#), 8 December 2016, 1545 (Robert Orr).

8 IRCC, [Find a visa application centre](#).

9 Countries such as the United Kingdom also use VACs. See, VFS.global, Official Partner of UK Visas & Immigration, In Canada, [Visa Application Centre](#).

10 CIMM, [Evidence](#), 8 December 2016, 1545 (Robert Orr).

who submitted paper-based applications to access the same online account information as those who applied electronically.¹¹

The IRCC call centre provides services in Canada to those who have submitted applications from within Canada or online in two forms: an automated service available at all times as well as Call Centre agents who answer calls, in English or French, Monday to Friday from 8 a.m. to 4 p.m., local time. The IRCC Call Centre services web page indicates that Call Centre agents should be contacted only if an application is beyond normal processing times and it is not possible to check the processing status online.¹²

In order to inform ongoing efforts to improve client experience, IRCC conducts a client satisfaction survey every two years and uses information collected at the Call Centre as well as through the IRCC web form feedback. The department received 5,000 complaints through the web form last year; the top three concerns related to processing times, the Call Centre services and online accounts.¹³

In 2015, 85% of IRCC clients reported being very satisfied with the service; these survey results are based on responses from about 3,700 applicants, a response rate of approximately 11%.¹⁴ The lack of satisfaction among the remaining 15% of respondents stemmed mostly from the inability to access case status information. Other reasons cited for dissatisfaction related to having to work through processes that are not intuitive along with the feeling that they are not being heard.¹⁵ Error rates in applications are also taken into account, suggesting the need to review whether application kits are unclear, for example.¹⁶

B. Recent changes at IRCC

In 2015, IRCC's commitment to improving client service led to assigning a senior executive¹⁷ specifically to this file with responsibility for initiatives in this area. Robert Orr, Assistant Deputy Minister, Operations, explained that a new approach, centred on the applicant's experience, was recently developed to redesign the spousal class sponsorship kit.¹⁸ This redesigned kit was released in December 2016.¹⁹ Mr. Orr remarked that not only

11 CIMM, [Evidence](#), 8 December 2016, 1535 (Robert Orr).

12 IRCC, [IRCC Call Centre Services](#).

13 IRCC's response to a request for information made by the Standing Committee on Citizenship and Immigration on December 8, 2016 (Kwan 2).

14 CIMM, [Evidence](#), 8 December 2016, 1545 (Michelle Lattimore, Associate Director General, Centralized Network, Department of Citizenship and Immigration).

15 CIMM, [Evidence](#), 8 December 2016, 1550 (Michelle Lattimore).

16 CIMM, [Evidence](#), 8 December 2016, 1655 (Paul Armstrong).

17 In September 2015, Ms. Michelle Lattimore was appointed Associate Director General, Centralized Network. CIMM, [Evidence](#), 8 December 2016, 1630 (Robert Orr).

18 CIMM, [Evidence](#), 8 December 2016, 1530 (Robert Orr).

19 Immigration, Refugees and Citizenship Canada, ["Improvements to spousal sponsorship process: The New Application Kit,"](#) News, Backgrounder, 7 December 2016.

was the language revised from grade 11 English (which was felt to be too high) to be clearer and more concise in the application guide, but it was also modified on the departmental website.²⁰

Further, Call Centre agents were given increased scope to look at client files, as well as training so that they could provide more comprehensive answers when individuals call for case status enquiries.²¹ The Committee heard that all calls are now logged into GCMS, which facilitates any subsequent follow-up calls.²² Moreover, although agents are spending more time (16%) on a call, the new approach has reduced same-day repeat callers by 30%.²³ Officials explained that Call Centre agents received 23 weeks of training, with emphasis on soft skills, including how to ask questions to get to the core of the caller's request and the importance of the tone of voice used.²⁴ Officials said that lessons learned from modifications to the family class sponsorship would inform changes to other IRCC lines of business.

ISSUES BROUGHT TO THE COMMITTEE'S ATTENTION

Witnesses identified a broad range of issues and shared with the Committee a number of ideas for improving client service at IRCC. In particular, witnesses highlighted frustrations with the Call Centre, the departmental website and online applications, including the status updates provided online. More complex issues were also raised with the Committee, including the possible use of artificial intelligence in business applications; how to address minor errors that can result in applications being returned, potentially jeopardizing rights; how to facilitate access to IRCC's services for individuals with little English or French language skills; and the provision of in-person services. Finally, processing times, fees and customer service from other government departments may not be new issues but with the modernization certainly added new perspectives.

A. The Call Centre

The IRCC Call Centre has been the subject of numerous complaints about poor client service. Departmental officials provided detailed information regarding complaints received. Specifically, they noted that, with regard to the 4,453 feedback web forms received in 2015, there were 35 complaints specific to service at the Call Centre; of those complaints, four related to accessibility and 28 to Call Centre agents. After a review of the complaints related to Call Centre agents, it was determined that quality standards had not

20 CIMM, [Evidence](#), 8 December 2016, 1600 (Robert Orr).

21 CIMM, [Evidence](#), 8 December 2016, 1645 (Robert Orr) and CIMM, [Evidence](#), 8 December 2016, 1645 (Michelle Lattimore).

22 CIMM, [Evidence](#), 8 December 2016, 1535 (Robert Orr).

23 CIMM, [Evidence](#), 8 December 2016, 1555 (Michelle Lattimore).

24 CIMM, [Evidence](#), 8 December 2016, 1650 (Michelle Lattimore).

been met in 15 cases, because the agents lacked professionalism (8), lacked knowledge of program and procedures (5) or failed to communicate clearly (2).²⁵

The Committee heard that many Call Centre users were frustrated by the menu and the length of time it took to speak to an agent. As David Nurse explained, “I’ve personally found it very difficult to navigate the Call Centre. On many occasions I’ve navigated myself into a dead end. Either I’ve been disconnected or I was sitting there with a dead phone, wondering how clients manage this.”²⁶ Another issue raised by witnesses was the limited information that agents were actually allowed to impart to callers. For example, Stephen Green told the Committee:

[A]pplicants who call to inquire about the status of an application that is beyond the normal processing time will often be told by the Call Centre agent only that their application is “in process”, and will not be given any further information regarding whether any further documentation is needed, when the application can be expected to be finalized, etc. This type of answer is of no use to an applicant.²⁷

Other issues raised with respect to the Call Centre include barriers for lawyers and for those needing interpretation. Mr. Green told the committee that there are too many layers of verification questions, which are repeated for each client a lawyer represents.²⁸ While non-governmental organizations provide interpretation services for clients who speak little or no English or French, the Canadian Council for Refugees (CCR) explained that, in order for this to happen, the client must sign and send forms to IRCC, causing delays and multiple visits to the service-provider organization.²⁹

Some witnesses, such as Dory Jade of the Canadian Association of Professional Immigration Consultants (CAPIC), commended IRCC on recent changes to the Call Centre, saying that it was a more welcoming experience right from the moment the call connects, as the first words are now “Welcome. Thanks for calling Immigration and Citizenship Canada”.³⁰

A number of recommendations were put forward by witnesses to improve Call Centre services. Many called for a simpler navigational menu and additional training for agents to ensure a more client-friendly experience. Witnesses also recommended that agents use simpler language and facilitate the use of interpreters to support a person contacting the Call Centre. Mr. Jade recommended that IRCC assign senior agents to deal with authorized representatives, as well as certain areas of expertise; for example, a team of agents could be established to answer questions related to refugee programs. Mr. Jade

25 IRCC’s response to a request for information made by the Standing Committee on Citizenship and Immigration on December 8, 2016 (Kwan 2).

26 CIMM, [Evidence](#), 13 December 2016, 1635 (David Nurse, Counsel, McInnes Cooper, as an individual).

27 Stephen Green, Green and Spiegel (Green), [Written Submission](#), p. 4.

28 Green, [Written Submission](#), pp. 3-4.

29 Canada Council for Refugees (CCR), [Written Submission](#), p. 2.

30 CIMM, [Evidence](#), 13 December 2016, 1530 (Dory Jade, Chief Executive Officer, Canadian Association of Professional Immigration Consultants).

also recommended that IRCC create a hotline for consultants to speak directly with immigration officers on specific files.

B. Departmental website and online applications

1. A website accessible to all

More than one witness found that the design of IRCC's website was not user friendly. Arleigh Lockett, of the private sponsorship group Syrian Refugees Gravenhurst, reported that it was difficult to find the information the group needed to submit an application.³¹ Loly Rico of the CCR expressed the feeling that the website was designed for persons who had assistance (such as paid representatives) and not for clients who were not proficient in English or French.³² Both she and the Inter Clinic Immigration Working Group (ICIWG) called for a simplified website. Vance Langford recommended the following changes for the website: "plain language, easy to follow check lists and perhaps systems in GCMS that require a document before you can file the application."³³

2. Online applications

Witnesses shared with the Committee their perception that applications processed online are completed more quickly than paper-based applications and recommended that all applications should therefore be processed online. Highlighting this perceived discrepancy, Mr. Jade and Mr. Nurse suggested that processing times under the still paper-based Family Class and Provincial Nominee Programs are much slower in comparison with the Express Entry program, under which applications are typically processed within six months of applying. They stated that the lengthy processing in other streams was perhaps a sign of the level of priority the department placed on those categories of immigration.

Witnesses observed that the linking function IRCC offers to connect a paper-based application with a client's online account could stand to be improved. The Canadian Bar Association (CBA) pointed out that this "link" function did not always work and that no technical assistance from IRCC is offered when there are problems in this regard. Mr. Green noted that clients often start an application process by paper but then seek legal representation to continue processing their application. He therefore suggested making the link function available to representatives so that they can electronically access a client's paper-based application through their representative portal.³⁴

Witnesses also raised a number of practical problems with the existing online application process, including having to fill out required fields not applicable to a particular

31 CIMM, [Evidence](#), 1 February 2016, 1635 (Arleigh Lockett, Representative, Syrian Refugees Gravenhurst).

32 CIMM, [Evidence](#), 13 December 2016, 1550 (Loly Rico, President, Canadian Council for Refugees).

33 CIMM, [Evidence](#), 1 February 2016, 1710 (Vance P.E. Langford, Chair, Immigration Law Section, Canadian Bar Association).

34 Green, *Written Submission*, p. 7.

case. For example, the CCR noted that refugees applying for a work permit may not have a current passport, yet the online form requires a passport expiry date set in the future. In these situations, applicants are instructed to fill in random numbers so that the application is validated in the system.³⁵ Another concern raised mostly in relation to the refugee stream is that applicants may not have access to computers or the expertise to use them, which means they must rely on others to help them complete the forms. To address this situation, Ms. Rico and the ICIWG recommended that IRCC simplify its application forms.³⁶ The CCR also recommended that “IRCC provide funding to community organizations who provide support to refugees and other vulnerable persons as they negotiate immigration processes”.³⁷

The inability of applicants to view their completed application once filed was also of practical concern to witnesses.³⁸ The Committee was told that applicants aware of this issue take screen shots or print every page before submitting their application. This allows them to provide consistent information across applications, as may be required. Mr. Green recommended that the online system allow applicants to maintain a complete record of every application filed.³⁹

Finally, online payments were identified as a source of difficulty for refugees. As newcomers, many do not have credit cards and may not have a high enough limit to pay by debit. As such, witnesses recommended returning to the previous policy of accepting proof of payment at a bank.⁴⁰

3. Status updates

Witnesses advised the Committee that the status updates offered to clients through their personalized account through the website or eCAS tool do not provide sufficient detail and are not updated often enough.⁴¹ Witnesses described four types of possible statuses: “open”, “in process”, “decision to be taken” and “closed”,⁴² adding that “in process” status can last from six months to a year.⁴³

Various measures were proposed by witnesses to address deficiencies. The CBA recommended that immigration program managers be provided with additional resources

35 CCR, *Written Submission*, p. 2. The Canadian Bar Association (CBA) notes that, for police clearances, not only are there fields that are inapplicable and random data must be put in, but there is a lot of uncertainty about police certificates that are sent by countries directly to IRCC. CBA, [Written Submission](#), p. 6.

36 CIMM, [Evidence](#), 13 December 2016, 1540 (Loly Rico); Inter-Clinic Immigration Working Group (ICIWG), [Written Submission](#), p.1.

37 CCR, [Written Submission](#), p.2.

38 Green, *Written Submission*, p. 7; CBA, *Written Submission*, p.6.

39 Green, *Written Submission*, p. 7.

40 CCR, *Written Submission*, p. 2.

41 CIMM, [Evidence](#), 1 February 2016, 1630 (Chantal Desloges, Lawyer, Desloges Law Group, as an individual).

42 CIMM, [Evidence](#), 13 December 2016, 1550 (Dory Jade).

43 CIMM, [Evidence](#), 13 December 2016, 1555 (Loly Rico).

to respond to status enquiries by email.⁴⁴ Chantal Desloges suggested that IRCC send automated emails when an application was outside standard processing to reassure the applicant that it was still moving forward.⁴⁵ Mr. Jade suggested that consultants have direct access to the notes in the GCMS through the Authorized Representative portal so that they can find out the case status without having to submit an Access to Information request. In response to these concerns, departmental officials informed the Committee that they plan to add more status information to online accounts.

4. Innovation for the future

Innovations from the private sector may provide ideas for IRCC's future directions. For instance, Saima Malik, Associate Vice-President of Digital Channels at TD Bank Financial Group, explained how, with the use of artificial intelligence, an interactive Question and Answer guides clients' queries, thereby reducing the number of enquiries that require clients to interact via video chat with an actual person.⁴⁶ Clients can also submit questions online, and the response is posted, after review, to the public on social media, so that clients can search there first to see if a question similar to theirs has been answered before. Other innovations of interest mentioned by Ms. Malik included online appointment booking and "slimmed down" processes that allow clients to access services on mobile devices.

Richard Kurland read to the Committee memoranda from IRCC released under Access to Information that explained in detail how the department is using artificial intelligence. He explained that IRCC's current information technology system does more than simply manage intake; it also conducts risk triage based on past performance and pulls information necessary for an officer to determine admissibility. Mr. Kurland stated that this technology allows for faster processing:

For example, it uses past performance. Where they see variables.... Where you have 95% acceptance rates, based on either a visa issued by another country or all of the particular case-specific factors, and 95 times out of 100 there is a positive decision, you tag the acceptable risk level of an adverse outcome and say, "Fine, we'll get it wrong 1 out of 50 times. It's worth the risk", and you end up with two- to three-day processing periods where it used to take three or four months.⁴⁷

In terms of other innovations, Ms. Desloges expressed frustration with the current way of booking interviews, and recommended that IRCC implement an online booking application.⁴⁸ Mr. Kurland reported that the United States already uses an online booking system.⁴⁹

44 CIMM, [Evidence](#), 1 February 2016, 1700 (Vance P.E. Langford).

45 CIMM, [Evidence](#), 1 February 2016, 1630 (Chantal Desloges).

46 CIMM, [Evidence](#), 1 February 2016, 1705 (Saima Malik, Associate Vice-President of Digital Channels, TD Bank Financial Group).

47 CIMM, [Evidence](#), 13 December 2016, 1720 (Richard Kurland, Lawyer and Policy Analyst, as an individual).

48 CIMM, [Evidence](#), 1 February 2016, 1630 (Chantal Desloges).

49 CIMM, [Evidence](#), 13 December 2016, 1715 (Richard Kurland).

C. Returns and refusals

The Committee heard that IRCC's administrative procedures and practices can have serious and adverse effects on an individual's application. Importantly, witnesses observed that IRCC's practice of returning incomplete applications can often put significant rights at risk. Examples highlighted by witnesses in this regard include children who "age out" and may no longer be considered dependents and workers who lose implied status because the application is not actually being processed.

The CBA suggested that IRCC's procedures include routine requests for additional information at the time when applications are received. For minor mistakes, Ms. Desloges stressed that it would be far better to request additional information from applicants by phone or by email.

The Committee heard that another cause for returned applications is the frequency with which IRCC updates its forms, often without advance notice or a transition period. Witnesses identified this practice as a major barrier that could be remedied by simply asking the applicant to resubmit the new form without penalizing him or her by returning the entire original package.⁵⁰

Mr. Kurland informed the Committee that currently the only way to deal with minor errors is to ask for "reconsideration".⁵¹ However, reconsideration is not always available. Other witnesses explained that, when a negative decision is received, there is only a 15-day time frame to submit an application for leave and judicial review to the Federal Court in an effort to protect the rights of their clients.⁵² If an application has been made to the Federal Court, IRCC officials will no longer reconsider the matter, communications being restricted to lawyers from the Department of Justice. To avoid such litigation, Mr. Green recommended that IRCC set up a "Reconsideration Committee" to deal with reconsideration requests within the applicant's 15-day deadline where clear errors have been made in processing applications.⁵³

Witnesses also told the Committee that improved client service also means providing more detailed refusal letters to clients. Vance Langford of the CBA observed that this could be done fairly easily by including the GCMS notes with a negative decision.⁵⁴

David Arnold, Chief Migration Officer with Australian Immigration and Border Protection, informed the Committee how visitor visa refusals are handled in the Australian system. He indicated that each refusal was accompanied by a detailed letter of up to six pages, explaining why the person was found not to be a genuine visitor or indicating any issues relating to character or health. Mr. Arnold further explained that refused applicants

50 ICIWG, [Written Submission](#), p. 2, CBA, *Written Submission*, pp. 7-8.

51 CIMM, [Evidence](#), 13 December 2016, 1715 (Richard Kurland).

52 Green, *Written Submission*, pp. 4-5; CBA, *Written Submission*, p. 7.

53 Green, *Written Submission*, pp. 4-5.

54 CIMM, [Evidence](#), 1 February 2016, 1635 (Vance P.E. Langford).

may launch an appeal at the Migration Refugee Tribunal, but that right is reserved only for those with a tie to the country, such as an Australian spouse.⁵⁵

D. Facilitating access for non-English/French speakers

A key concern raised by witnesses dealt with the linguistic barriers faced by individuals who are not able to interact with IRCC officials in either English or French. In order to facilitate access for non-English/French speakers, Ms. Rico recommended that forms be available in other popular languages, such as Mandarin and Spanish.⁵⁶ She explained that the website should provide guidance in other languages, in particular for the use of “My Account”, where, for example, entering a change of address can be arduous for non-English/French speakers.

In response to those concerns, Ms. Lattimore indicated that IRCC was looking at the business case for expanding the range of languages used in delivering client service but noted that factors such as the cost of translation and keeping the website updated had to be taken into account in determining what could be done in this area.⁵⁷

By comparison, the Australian immigration department provides some services in a range of languages. Mr. Arnold stated that they take a demand-driven approach; in the Americas, for example, forms are available in Spanish and their hotline for the region, based in Ottawa, provides service in four different languages. For clients in Australia, the department provides interpreters by phone at no cost at all times, including service to the Australian equivalent of 911.⁵⁸

E. Opportunities for in-person service

Witnesses emphasized that, behind every immigration application, there are real people. Mr. Nurse advised the Committee that the provincial immigration office saw an increase in walk-ins when the local Citizenship and Immigration Office closed. He suggested that this increase demonstrates that people value and seek out face-to-face interaction concerning their applications and recommended setting up a system to assist people in navigating the system, similar to the VACs. Mr. Green suggested that enquiries to Members of Parliament would significantly drop if a few centres were re-opened in limited circumstances.⁵⁹

However, in its written brief, the CBA cautioned that the *Immigration and Refugee Protection Act* allows for advice to be given for a fee only by lawyers and registered

55 CIMM, [Evidence](#), 1 February 2016, 1650 (David Arnold, Chief Migration Officer, Immigration and Border Protection, Australian High Commission).

56 CIMM, [Evidence](#), 13 December 2016, 1550 (Loly Rico).

57 CIMM, [Evidence](#), 8 December 2016, 1600 (Michelle Lattimore).

58 CIMM, [Evidence](#), 1 February 2016, 1655 (David Arnold).

59 CIMM, [Evidence](#), 1 February 2016, 1635 (Stephen Green, Lawyer, Partner, Green and Spiegel LLP, as an individual).

consultants.⁶⁰ This legal framework would impact on any future expansion of in-person services by third parties.

F. Processing times and service standards

Witnesses told the Committee that the need for faster processing was a client service issue. In relation to work permits, both the CCR and the ICIWG recommended streamlining the process by issuing work permits concurrently with other documents. For instance, work permits granted to refugees could be issued in tandem with their Interim Federal Health Program papers.⁶¹ The ICIWG also suggested that work permits be issued concurrently with the initial decision on applications for permanent residence on humanitarian and compassionate grounds (when the person is accepted in principle). Finally, they recommended that the validity period of work permits be a year rather than the current six months in order to take IRCC's processing times into account.⁶²

Mr. Kurland suggested implementing a pilot project, for emergency purposes, whereby applications could be processed more quickly for a fee, as long as the emergency was clearly established. He further recommended that IRCC delegate quality assurance of applications to the private sector to accelerate processing.⁶³

Several witnesses stated that publishing actual processing times and establishing service delivery standards are important elements of accountability as well as client service delivery.⁶⁴ Mr. Kurland suggested that, in order to provide reasonable expectations of a date of visa delivery, IRCC post the remaining target for the year and the outstanding inventory for each category.⁶⁵

Officials stated that they were aware of the level of performance for those lines of business with service standards. Mr. Orr explained that departmental officials monitor productivity levels and make adjustments as needed, adding that failure to meet service standards may relate to a spike in demand at a particular office.⁶⁶

Witnesses asked that service standards be set for all lines of business, bringing the Committee's attention to the lack of service standards in the following areas: restoration of status (for temporary residents), inland Temporary Resident Permits, Permanent Resident Travel Documents, reconsiderations after judicial review (or consent), investigations on Permanent Resident card renewals, "one-year- window" applications for family

60 CBA, *Written Submission*, p. 7. See section 91 of the *Immigration and Refugee Protection Act*.

61 CIMM, [Evidence](#), 13 December 2016, 1545 (Loly Rico).

62 ICIWG, *Written Submission*, p. 2.

63 CIMM, [Evidence](#), 13 December 2016, 1715 (Richard Kurland).

64 CBA, *Written Submission*, p. 6; CCR, *Written Submission*, p.3.

65 CIMM, [Evidence](#), 13 December 2016, 1705 (Richard Kurland).

66 CIMM, [Evidence](#), 8 December 2016, 1615 (Robert Orr).

reunification for resettled refugees, and applications for dependants abroad of refugees and dependents of Live-in Caregivers.⁶⁷

G. Fees

The Committee heard that IRCC's fees should be reviewed, in part to reflect efficiencies gained under new processes. For example, Mr. Kurland noted that due to increased involvement of third parties, such as credential evaluation bodies, the cost of issuing visas has gone down. He suggested it may be time to subject immigration fees to the *User Fees Act*, which requires accountability in pricing.

Another fee-related concern was raised by the CCR. They explained that the new additional \$100 compliance fee for open work permits⁶⁸ was not consistently applied to the situation of failed refugee claimants. In their experience, IRCC provided inconsistent information about the additional fee, and some applicants who paid it received refunds, while others had their application returned for not paying it.⁶⁹

H. Customer service from other government departments

The IRCC delivers its programs in collaboration with other federal departments and agencies. For instance, IRCC partners with Employment and Social Development Canada (ESDC) and Service Canada in delivery of the Temporary Foreign Worker Program (TFWP) and the International Mobility Program. The Canada Border Services Agency (CBSA) may be an enforcement agency, but it also represents and delivers services on behalf of IRCC at the border: making decisions on temporary admission, work permits, residency obligations and landing for permanent residents.

The CBA observed that improved and successful client service delivery is possible only if it is a shared objective across all departments and agencies.⁷⁰ A recommendation that stems from this observation is for CBSA officers at ports of entry to be able to contact immigration officials for guidance at all times.⁷¹ Further, certain irritants in client service, such as "red flags" that are in the system for particular individuals, are under the responsibility of the CBSA. The CBA explained that red flags delay persons from entering Canada because these individuals are subject to further examination. Yet there is no standard process in place to remove these flags once they are investigated, a situation that the CBA recommended should be addressed.⁷²

To better serve Canadian businesses, witnesses suggested that CBSA officers need to be knowledgeable about the TFWP and the International Mobility Program, and in

67 CBA, *Written Submission*, p. 6; CCR, *Written Submission*, p.4.

68 IRCC, [Notice – Changes to strengthen employer accountability under the International Mobility Program](#).

69 CCR, *Written Submission*, pp. 2-3.

70 CIMM, *Evidence*, 1 February 2016, 1645 (Vance P.E. Langford).

71 CBA, *Written Submission*, p. 3.

72 CBA, *Written Submission*, p. 3.

particular with different requirements for work permits in each program. For instance, officers should know when employers are required to obtain a Labour Market Impact Assessment from ESDC. Such assessments demonstrate that there is no harm to the Canadian labour market if a foreign national enters Canada to work in a specific position. The CBA recommended creating a trusted employer program offering employers an expedited service for a reasonable fee. Another recommendation was to create centres of specialized knowledge that could include employees from each department where “advance opinions” could be obtained.

CONCLUSION AND RECOMMENDATIONS

The Committee recognizes that IRCC has made a priority of modernizing client service delivery. Testimony heard in the course of this study confirms both the necessity and the complexity of this endeavour. Immigration is a life-changing journey for individuals who should not be frustrated by processes and bureaucracy. As such, the Committee makes the following recommendations to build on the department’s efforts already under way.

Call Centre

The Committee was pleased to hear about the changes IRCC has implemented to the Call Centre for family class applications. These changes address concerns raised by witnesses and improve operational efficiency, as evidenced by the reduction in the number of same-day calls. The Committee encourages the department to implement similar changes in other lines of business and looks forward to hearing progress reports on further Call Centre improvements.

As IRCC moves forward with reforming the Call Centre, the Committee wishes to draw attention to several issues. The Committee heard that Call Centre agents do not communicate their knowledge in simple-to-understand terms for those who may be new to English or French; nor do they facilitate calls when interpreters are involved. The Committee also heard that callers often wait for long periods before being connected to a live agent. Finally, witnesses suggested that Call Centre agents could be assigned to a certain type of immigration application so that they could develop greater subject-matter expertise as a means of improving service. In light of this testimony and the important role that the Call Centre plays in conveying IRCC’s information to clients, the Committee recommends the following:

RECOMMENDATION 1

That Immigration, Refugees and Citizenship Canada train all Call Centre agents on client service excellence and on how to communicate with people who may have limited English or French speaking abilities.

RECOMMENDATION 2

That Immigration, Refugees and Citizenship Canada provide a standard process to facilitate calls between a client and a Call Centre agent when an interpreter is used.

RECOMMENDATION 3

That Immigration, Refugees and Citizenship Canada have a 15-minute standard for clients to be connected with an advisor or agent for all Call Centre operations.

RECOMMENDATION 4

That Immigration, Refugees and Citizenship Canada consider including specializations and subject-matter experts for Call Centre advisors and agents based on application type, including (1) temporary residence, (2) permanent residence, (3) refugees, including protected persons, (4) citizenship and (5) passports.

Website

The IRCC website is also an important client service interface. Witnesses drew the Committee's attention to certain problems with the website in its current form and also provided concrete suggestions for improvement. In light of what we heard concerning the IRCC website, the Committee recommends the following:

RECOMMENDATION 5

That Immigration, Refugees and Citizenship Canada consider, as part of the redesign of its website, using (1) client-centric design principles to produce digital channels for each business line, (2) plain language, (3) languages other than French and English, similar to what the Government of British Columbia is doing, and (4) virtual assistance.

RECOMMENDATION 6

That Immigration, Refugees and Citizenship Canada make improvements to "My Account" to allow clients to view and print applications before filing and during processing, and allow applicants to maintain a complete record of every application filed.

RECOMMENDATION 7

That Immigration, Refugees and Citizenship Canada improve the ability for applicants and their representatives to link paper applications with online accounts.

RECOMMENDATION 8

That Immigration, Refugees and Citizenship Canada provide alternative payment methods for individuals without access to online payment services and credit cards, such as returning to the previous policy of accepting proof of payment at a bank.

Providing more frequent and useful information

Another important issue also raised in the course of this study is the need to obtain more frequent and useful case information from IRCC. Witnesses made a number of suggestions in this regard, including making GCMS notes available online and providing more detailed status updates through a client's online accounts. With respect to the private sponsorship program, witnesses suggested that the government establish standards for frequency of communication with sponsoring groups so that their resources can be used effectively and they can maintain support for the sponsorship.

The Committee heard from the department that providing clients with greater assurance that their application is moving forward is one of their current priorities for client service. We fully support this priority and make the following recommendations:

RECOMMENDATION 9

That Immigration, Refugees and Citizenship Canada contact clients via email or other channels when (1) processing exceeds times provided at the time of application (2) an incorrect payment is made (3) common or simple errors are made on the application.

RECOMMENDATION 10

That Immigration, Refugees and Citizenship Canada implement an online portal for clients and authorized representatives to track application progress, including but not limited to: (1) current status of the application, (2) any reasons for delays, (3) an estimated time for decision and (4) any missing information or complications with the application.

The Committee also feels that the department could consider providing more useful information on refusals, particularly for temporary resident visa applicants and humanitarian and compassionate applications. The example from Australia suggests that it is possible to provide failed applicants with a more fulsome explanation while maintaining fast processing. Further, as indicated by witnesses, proactive disclosure of reasons for refusal may lower the volume of Access to Information requests made to the department. In light of these observations, the Committee recommends the following in relation to providing clients with more useful information:

RECOMMENDATION 11

That Immigration, Refugees and Citizenship Canada provide more information and details to clients on the reasons for negative decisions.

Finally, in the area of providing more frequent and useful information, the Committee recommends as follows:

RECOMMENDATION 12

That Immigration, Refugees and Citizenship Canada examine ways, in collaboration with partners and stakeholders, to increase the number of pre-arrival service sessions available, including attendance, in Foreign Service locations.

RECOMMENDATION 13

That Immigration, Refugees and Citizenship Canada ensure Members of Parliament and Senators continue to have access to the Ministerial Enquiries Division.

Application forms

The Committee would also like to address the issue of application forms. We understand that the department plans to draw on its experience with revamping the spousal sponsorship application kit to make changes to other programs. The Committee supports regular review of application forms so that they can be as client-friendly as possible. The Committee would also like to address the issue, as raised by some witnesses, of clients being penalized by form changes that occurred after their application was submitted. On the matter of application forms, the Committee recommends as follows:

RECOMMENDATION 14

That Immigration, Refugees and Citizenship Canada regularly review all application forms to (1) simplify the form, (2) improve the client experience, and (3) evaluate common patterns in mistakes and errors made on applications.

RECOMMENDATION 15

That Immigration, Refugees and Citizenship Canada establish a process for notifying applicants when forms are changed and establish a mechanism to ensure that completed applications submitted with once-current forms are not rejected due to form changes.

Processing Times

Processing times and service standards were also identified as important client service issues by witnesses, who noted that not all IRCC lines of business are subject to service standards. Witnesses also noted that, for certain applicants working temporarily as they await a final decision that would allow them to remain in Canada, the validity period of the work permit does not correspond with the waiting period for the decision. To address these concerns, the Committee recommends as follows:

RECOMMENDATION 16

That Immigration, Refugees and Citizenship Canada consider establishing service standards and processing times for all business lines and publish the standards on the website.

RECOMMENDATION 17

That Immigration, Refugees and Citizenship Canada extend the validity period of work permits from six months to one year to take into account processing times at the department.

Performance Measurement and Client Feedback

The Committee heard that IRCC has mechanisms in place for soliciting client feedback and some performance indicators for client service. The Committee encourages the department to continue work in this area and recommends as follows:

RECOMMENDATION 18

That Immigration, Refugees and Citizenship Canada offer automatic client service feedback forms for applications to the department.

RECOMMENDATION 19

That Immigration, Refugees and Citizenship Canada review key performance indicators for all client service channels and review best practices from other immigration systems around the world, such as those of the United States, Australia, New Zealand and the United Kingdom.

Reconsideration

The Committee heard that errors in processing applications that could easily be rectified sometimes end up in court because there is no other way to address them. The Committee is of the opinion that it would be in everyone's interest to avoid this costly route, and we make the following recommendation accordingly:

RECOMMENDATION 20

That Immigration, Refugees and Citizenship Canada create a “Reconsideration Committee” to deal with reconsideration requests within applicants’ 15-day deadline.

Continuous Improvement in Customer Service

In the spirit of continuous improvement, the Committee feels that IRCC should conduct more outreach, including targeted efforts for employers and refugees. We also encourage the Department to examine the possibility of providing customer service in person, which is not currently possible. Specifically, the Committee recommends the following:

RECOMMENDATION 21

That Immigration, Refugees and Citizenship Canada conduct “client service and delivery” consultations with customer and client service experts, the private sector, former and current clients of Immigration, Refugees and Citizenship Canada and all Canadians on how the department can better provide service.

RECOMMENDATION 22

That Immigration, Refugees and Citizenship Canada consult with refugees to determine their issues with client service and take steps to address them; the review would include (but would not be limited to) the website, Call Centre, languages used, access to technology and payments.

RECOMMENDATION 23

That Immigration, Refugees and Citizenship Canada work to better serve Canadian businesses and employers by studying the possible benefits of the department creating a trusted employer program to offer employers an expedited service for assessments (subject to a fee); that this study include input from Canadian businesses and employers; and that IRCC make its findings available to the Committee.

RECOMMENDATION 24

That Immigration, Refugees and Citizenship Canada conduct a cost-benefit analysis on having regional immigration offices to deliver in-person service similar to Passport Canada and Service Canada locations.

For many Members of Parliament, a large percentage of their constituency work is related to immigration and citizenship applications filed with Immigration, Refugees and Citizenship Canada. The Committee recognizes that the department handles many

applications on a daily basis and generally delivers timely and professional service. It is our hope that the recommendations in this report will assist IRCC in its continued efforts to modernize its approach to client service and at the same time reduce the need for intervention from Members of Parliament.

LIST OF RECOMMENDATIONS

RECOMMENDATION 1

That Immigration, Refugees and Citizenship Canada train all Call Centre agents on client service excellence and on how to communicate with people who may have limited English or French speaking abilities..... 14

RECOMMENDATION 2

That Immigration, Refugees and Citizenship Canada provide a standard process to facilitate calls between a client and a Call Centre agent when an interpreter is used. 15

RECOMMENDATION 3

That Immigration, Refugees and Citizenship Canada have a 15-minute standard for clients to be connected with an advisor or agent for all Call Centre operations. 15

RECOMMENDATION 4

That Immigration, Refugees and Citizenship Canada consider including specializations and subject-matter experts for Call Centre advisors and agents based on application type, including (1) temporary residence, (2) permanent residence, (3) refugees, including protected persons, (4) citizenship and (5) passports..... 15

RECOMMENDATION 5

That Immigration, Refugees and Citizenship Canada consider, as part of the redesign of its website, using (1) client-centric design principles to produce digital channels for each business line, (2) plain language, (3) languages other than French and English, similar to what the Government of British Columbia is doing, and (4) virtual assistance. 15

RECOMMENDATION 6

That Immigration, Refugees and Citizenship Canada make improvements to “My Account” to allow clients to view and print applications before filing and during processing, and allow applicants to maintain a complete record of every application filed. 15

RECOMMENDATION 7

That Immigration, Refugees and Citizenship Canada improve the ability for applicants and their representatives to link paper applications with online accounts. 15

RECOMMENDATION 8

That Immigration, Refugees and Citizenship Canada provide alternative payment methods for individuals without access to online payment services and credit cards, such as returning to the previous policy of accepting proof of payment at a bank. 16

RECOMMENDATION 9

That Immigration, Refugees and Citizenship Canada contact clients via email or other channels when (1) processing exceeds times provided at the time of application (2) an incorrect payment is made (3) common or simple errors are made on the application..... 16

RECOMMENDATION 10

That Immigration, Refugees and Citizenship Canada implement an online portal for clients and authorized representatives to track application progress, including but not limited to: (1) current status of the application, (2) any reasons for delays, (3) an estimated time for decision and (4) any missing information or complications with the application. 16

RECOMMENDATION 11

That Immigration, Refugees and Citizenship Canada provide more information and details to clients on the reasons for negative decisions..... 17

RECOMMENDATION 12

That Immigration, Refugees and Citizenship Canada examine ways, in collaboration with partners and stakeholders, to increase the number of pre-arrival service sessions available, including attendance, in Foreign Service locations..... 17

RECOMMENDATION 13

That Immigration, Refugees and Citizenship Canada ensure Members of Parliament and Senators continue to have access to the Ministerial Enquiries Division..... 17

RECOMMENDATION 14

That Immigration, Refugees and Citizenship Canada regularly review all application forms to (1) simplify the form, (2) improve the client experience, and (3) evaluate common patterns in mistakes and errors made on applications. 17

RECOMMENDATION 15

That Immigration, Refugees and Citizenship Canada establish a process for notifying applicants when forms are changed and establish a mechanism to ensure that completed applications submitted with once-current forms are not rejected due to form changes..... 17

RECOMMENDATION 16

That Immigration, Refugees and Citizenship Canada consider establishing service standards and processing times for all business lines and publish the standards on the website. 18

RECOMMENDATION 17

That Immigration, Refugees and Citizenship Canada extend the validity period of work permits from six months to one year to take into account processing times at the department..... 18

RECOMMENDATION 18

That Immigration, Refugees and Citizenship Canada offer automatic client service feedback forms for applications to the department..... 18

RECOMMENDATION 19

That Immigration, Refugees and Citizenship Canada review key performance indicators for all client service channels and review best practices from other immigration systems around the world, such as those of the United States, Australia, New Zealand and the United Kingdom..... 18

RECOMMENDATION 20

That Immigration, Refugees and Citizenship Canada create a “Reconsideration Committee” to deal with reconsideration requests within applicants’ 15-day deadline..... 19

RECOMMENDATION 21

That Immigration, Refugees and Citizenship Canada conduct “client service and delivery” consultations with customer and client service experts, the private sector, former and current clients of Immigration, Refugees and Citizenship Canada and all Canadians on how the department can better provide service..... 19

RECOMMENDATION 22

That Immigration, Refugees and Citizenship Canada consult with refugees to determine their issues with client service and take steps to address them; the review would include (but would not be limited to) the website, Call Centre, languages used, access to technology and payments. 19

RECOMMENDATION 23

That Immigration, Refugees and Citizenship Canada work to better serve Canadian businesses and employers by studying the possible benefits of the department creating a trusted employer program to offer employers an expedited service for assessments (subject to a fee); that this study include input from Canadian businesses and employers; and that IRCC make its findings available to the Committee..... 19

RECOMMENDATION 24

That Immigration, Refugees and Citizenship Canada conduct a cost-benefit analysis on having regional immigration offices to deliver in-person service similar to Passport Canada and Service Canada locations..... 19

APPENDIX A LIST OF WITNESSES

Organizations and Individuals	Date	Meeting
<p>Department of Citizenship and Immigration</p> <p>Paul Armstrong, Director General Centralized Network</p> <p>Michelle Lattimore, Associate Director General Centralized Network</p> <p>Robert Orr, Assistant Deputy Minister Operations</p> <p>Fraser Valentine, Director General Strategic Policy and Planning</p>	2016/12/08	44
<p>As individuals</p> <p>Richard Kurland, Lawyer and Policy Analyst</p> <p>David Nurse, Counsel McInnes Cooper</p>	2016/12/13	45
<p>Canadian Association of Professional Immigration Consultants</p> <p>Dory Jade, Chief Executive Officer</p>		
<p>Canadian Council for Refugees</p> <p>Loly Rico, President</p>		
<p>As individuals</p> <p>Chantal Desloges, Lawyer Desloges Law Group</p> <p>Stephen Green, Lawyer Partner, Green and Spiegel LLP</p>	2017/02/01	46
<p>Australian High Commission</p> <p>David Arnold, Chief Migration Officer Immigration and Border Protection</p>		
<p>Canadian Bar Association</p> <p>Vance P. E. Langford, Chair Immigration Law Section</p>		
<p>Syrian Refugees Gravenhurst</p> <p>Arleigh Luckett, Representative</p>		
<p>TD Bank Financial Group</p> <p>Saima Malik, Assistant Vice President Sales Capabilities, Digital Channels</p>		

APPENDIX B LIST OF BRIEFS

Organizations and Individuals

Canadian Bar Association

Canadian Council for Refugees

Green, Stephen

Inter Clinic Immigration Working Group

Syrian Refugees Gravenhurst

REQUEST FOR GOVERNMENT RESPONSE

Pursuant to Standing Order 109, the Committee requests that the government table a comprehensive response to this Report.

A copy of the relevant Minutes of Proceedings ([Meetings Nos. 44, 45, 46 and 52](#)) is tabled.

Respectfully submitted,

Borys Wrzesnewskyj
Chair

Modernization of Client Service Delivery: Supplementary Report by the New Democratic Party

Canada's immigration system can be very complex for individuals to successfully navigate through. While Immigration, Refugees and Citizenship Canada had made the modernization of client service delivery a priority, individuals and/or family members already in Canada often seek the help of their local Member of Parliament to provide needed assistance to ensure that applications and associated documentation are correctly completed and submitted. As a result, immigration related casework can be upwards of 90 percent of constituent casework for MPs. The volume of immigration related casework in MP offices, as well as the feedback from constituency office staff who provide these services, point to the need for reforms to be taken by IRCC to ensure that individuals can better understand how to navigate their way through the system.

With this need in mind, the Standing Committee on Citizenship and Immigration undertook a study to better understand what reforms could be undertaken to do this. The Committee had the opportunity to hear from 14 witnesses including IRCC officials, immigration lawyers, our international counterparts delivering similar services, comparable industries engaging in client service delivery improvements, professional immigration consultants, and refugee advocate organizations. Their valued testimony and recommendations formed the basis of the main report tabled by the Committee. New Democrats largely support the recommendations contained within that report. If undertaken by IRCC, the recommendations would significantly improve the ability for individuals within and outside Canada to successfully navigate through the application

process, allowing the cases to be determined on merit and allowing for applicants to better understand what stage of the process their application was in.

However, it is also the opinion of New Democrats that there is more to be done to improve the system. Recommendations contained within this supplementary report will outline additional steps that IRCC can undertake to make the immigration system more accessible to those wishing to make Canada their home.

Providing More Useful Information

One of the biggest complaints that were brought to the attention of the Committee, as well as daily feedback from constituency office staff dealing with casework is that individuals going through the application process do not have access to enough information. Additionally, the information that applicants do have access to is not accessible enough for them to obtain and fully understand it. This can result in significant time being spent by applicants, constituency office workers, and IRCC staff, relaying basic information that should be simple to find. This would provide more time for all involved to focus on more complex cases which actually need additional attention.

In a brief submitted by the Canadian Council for Refugees (CCR) to the Committee, it is explained that for vulnerable groups of immigrants such as refugees often lack the language skills and financial resources to be able to meaningfully engage with IRCC during application processes. For example, a refugee claimant might not have adequate access to internet, and even if they did, they might not have the English or French language skills required to understand the forms or other information that can be found on IRCC websites. Individuals in these situations often turn to settlement services

organizations or other advocacy organizations that they have engaged with for other services to obtain assistance navigating the system.ⁱ Currently, these organizations are already financially stretched to provide the services that they are provide funding for, and these additional services to help individuals navigate the system are not part of their mandates. In order to address this issue, New Democrats recommend that,

Recommendation One:

That Immigration, Refugees and Citizenship Canada provide funding to community organizations that provide support to refugees and other vulnerable persons as they negotiate immigration processes.

The Committee also heard from witnesses that the vague stages an application is identified within such as “pending” or “in process” can be a source of confusion and frustration as applications can remain in these vague stages for significant periods of time. In addition to providing more detailed information to applicants regarding the status of their application, immigration lawyer and policy analyst Richard Kurland provided a simple and low-cost recommendation for IRCC to undertake which would allow applicants to better gauge where their application was in the system in relation to other applications and in the context of Canada’s immigration targets. If IRCC published the number of permanent residence visas that had been issued during the current year, alongside the outstanding inventory and the target range for PR visas for the year, by each category, applicants would better understand where they were in the queue and would therefore have a better understanding of the approximate timeline for their application to be finalized should it be successful.ⁱⁱ This is because IRCC processes

applications on a first come first serve basis. Therefore, New Democrats propose the following recommendation,

Recommendation Two:

That Immigration, Refugees and Citizenship Canada make publicly available the available immigration targets for the year and outstanding inventories for each immigration class.

Processing Times

Processing times for all classes of immigration remain a source of frustration for many. The longer the time between application submission and the issuance of a visa the more resources in terms of constituency staff and IRCC staff time are spent inefficiently doing update checks because applicants become frustrated and concerned about the status of things and request checks to be made. While the Liberal government has made significant commitments to reduce processing times throughout the system, much work remains to be done. This is especially evident in immigration streams with significant inventory backlogs such as Parent/Grandparent Sponsorship under the Family Reunification Program.

In some cases, relatively simple measures can be undertaken independent of backlog reduction efforts or other processing time improvement initiatives that can also make significant improvements. In a brief submitted by the Canadian Bar Association (CBA) to the Committee, it was highlighted in the case of the Temporary Foreign Worker Program (TFWP), that processing times for various stages of the overall process could not only vary, but were often excessive; for example, the issuance of work permits and

the Labour Market Impact Assessments (LMIA).ⁱⁱⁱ In cases where multiple permits or processes must be undertaken, IRCC should examine the feasibility of concurrent processing instead of starting the process for one stage only after the previous stage is completed. In the example highlighted by the CBA, doing so would provide an individual a work permit and implied status sooner, allowing them to begin working and contributing faster, reducing hardship on the individual and any dependents. It is the opinion of New Democrats that,

Recommendation Three:

That Immigration, Refugees and Citizenship Canada, when possible utilize concurrent processing of applications, permits, and the issuance of other documents.

Continuous Improvements in Customer Service

Outside of the frequent sources of frustrations within the immigration system, such as accessibility of information and processing times, there are other more ‘back end’ improvements that can be made by IRCC. While less visible to the public, these types of improvement will make the overall system more modern, accessible, and efficient for individuals to engage with.

In their brief to the Committee, the CBA highlighted an issue at ports of entry with the ‘red flag’ system on individual files and the lack of a standardized procedure for removing these ‘flags’ once they are examined and cleared.^{iv} Without a proper mechanism for removal, individuals can have inconsistent, and frustrating experiences at Canadian ports of entry, sometimes being stopped and interrogated for situations they know have been previously addressed. Therefore, New Democrats recommend,

Recommendation Four:

That Immigration, Refugees and Citizenship Canada establish a clear, standard process for the removal of 'red flags' on individuals in the system, once investigations are completed

Finally, it was brought to the attention of the Committee that IRCC has been and continues to go through modernization efforts that have increased efficiency and which have allowed for more to be done in a timelier manner, and at a lower cost. These improvements are welcomed and this study was about finding ways to continue moving the system in that direction. However, it was noted that despite these efficiency improvements and cost reductions, savings are not being passed onto the individuals engaging with the system. In fact, under the previous government, many fees were actually subject to significant increases. Richard Kurland expressed his surprise that a comprehensive fee review had not been undertaken as a result of these efficiency improvements, stating,

“I don't think fees should be increased. I suspect that the dividends from information technology over the many years and the operational adjustments over many years have resulted in lower costs to deliver visas. It's rather incredible that no one has taken the time to re-examine why we're charging what we're charging.”^v

In light of these improvements, the improvements already planned on being undertaken, and possible improvements stemming from IRCC undertaking any recommendations brought forward by the Committee, New Democrats strongly urge,

Recommendation Five:

That Immigration, Refugees and Citizenship Canada undertake a comprehensive review of all user fees to ensure that fee levels are appropriate based on cost efficiency improvements that have been implemented in service delivery

Conclusion:

IRCC deals with millions of people on an annual basis through the variety of services it provides. Individuals engaging with IRCC come from all over the globe and have incredibly diverse backgrounds, including in some cases some of the most vulnerable groups of people in the world. As a result of the diverse client base, IRCC must make extensive efforts to ensure that services provided are accessible, efficient, and affordable. While improvements are ongoing, there is always more that can be done. It is the opinion of New Democrats that the recommendations provided in this report would lead to significant improvements in client service delivery and the IRCC should examine undertaking these steps.

ⁱ [CCR Submission to Standing Committee on Citizenship and Immigration](#)

ⁱⁱ CIMM, Evidence, 1st session, 42nd Parliament, 13 December 2016, 17:05

ⁱⁱⁱ [Modernization of Client Service Delivery, Canadian Bar Association Immigration Law Section](#)

^{iv} Ibid.,

^v CIMM, Evidence, 1st session, 42nd Parliament, 13 December 2016, 17:05

