



The Honourable Kevin Sorenson, P.C., M.P.  
Chair  
Standing Committee on Public Accounts  
Sixth Floor, 131 Queen Street  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Mr. Sorenson:

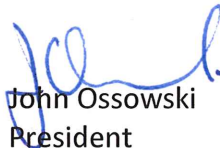
We are pleased to provide you with a report on progress made since the tabling on February 2, 2017, of the Government Response to the House of Commons Standing Committee on Public Accounts report entitled: *Report 2, Detecting and Preventing Fraud in the Citizenship Program, of the spring 2016 Reports of the Auditor General of Canada*. The Government Response which is available on your website indicated that four of the eight recommendations had been fully or partially implemented and committed to providing a progress report by March 31, 2017, on the remaining recommendations.

Immigration, Refugees and Citizenship Canada has worked in close consultation with the Canada Border Services Agency, the Royal Canadian Mounted Police and the Department of Public Safety in preparing the Government Response and we trust this report on progress addresses the remaining recommendations outlined in your report.

We appreciate the Committee's interest in further enhancing the integrity of the Citizenship Program. We continue to work towards deterring those who seek to commit fraud to obtain Canadian citizenship and we will remain committed to ongoing enhancements to the integrity of the Citizenship Program to ensure that only those who qualify obtain the valued status of Canadian citizenship.



Marta Morgan  
Deputy Minister  
Immigration, Refugees and  
Citizenship Canada



John Ossowski  
President  
Canada Border Services  
Agency



Bob Paulson  
Commissioner  
Royal Canadian Mounted  
Police

## **REPORT ON PROGRESS TO THE HOUSE OF COMMONS STANDING COMMITTEE ON PUBLIC ACCOUNTS ON DETECTING AND PREVENTING FRAUD IN THE CITIZENSHIP PROGRAM**

Pursuant to Standing Order 109, an official Government Response was tabled on February 2, 2017, and included progress reports on recommendations 1, 6, 7 and 8 of the Committee's eight recommendations.

The Government Response outlined that Immigration, Refugees and Citizenship Canada (IRCC) had:

- Developed a standard operating procedure for citizenship officers to systematically enter and update addresses in IRCC's database in order to better identify problematic or suspect addresses. Quality control exercises were undertaken and will continue to ensure procedures are followed.
- Taken significant steps to prevent and deter fraud in the Citizenship Program through improved training to detect and prevent ineligible applicants from obtaining citizenship.
- Developed an internal Citizenship Program Integrity Framework to monitor refusal rates and ensure instructions and fraud controls are being applied appropriately and achieving the intended results.
- Improved its information management practices and conducted, and will continue to conduct, regular program integrity exercises to ensure continuous improvement and adaptation to new and emerging forms of fraud.

With respect to recommendations 2, 3, 4 and 5, we are pleased to provide you with the requested progress reports below.

**RECOMMENDATION 2: That, by 31 March 2017, the *Department of Immigration, Refugees and Citizenship Canada* provide the House of Commons Standing Committee on Public Accounts with a report explaining its process to track seized documents and its joint training approach with the *Canada Border Services Agency*. This report should also outline the main results of the Department's quality assurance exercises on the process of document seizure.**

As stated in the Government Response, IRCC provided a high-level overview of the interim process to track seized documents and indicated that work is underway to develop a more permanent process through a system change in IRCC's database, the Global Case Management System. As well, the Response indicated that IRCC clarified its authorities related to document seizure, and provided detailed guidance to officers regarding the process to seize suspicious documents. In addition, Bill C-6, *An Act to amend the Citizenship Act*, introduced in Parliament on February 25, 2016, contains amendments that would provide new authorities for the seizure of documents under the *Citizenship Act* where there are reasonable grounds to believe that they were fraudulently or improperly obtained or used.

As for the results of the quality assurance exercises on the process of document seizure, as indicated in the Government Response, the Department will conduct these exercises by the end of March 2017, after which an analysis of the results will be undertaken. As such, a report on the results of the Department's quality assurance exercises on the process of document seizure is not available by March 31, 2017.

With regard to training, IRCC has developed a joint training approach with the Canada Border Services Agency (CBSA) where all citizenship officers who handle original documents will receive training to detect fraudulent documents. The CBSA's Level 1 Document Authentication training will be adapted to IRCC's needs as required. The CBSA will continue to deliver its level 2 Document Authentication training to key senior citizenship officers from IRCC who will then be able to deliver training to other citizenship officers to ensure basic tools and methodologies are used to detect fraudulent documents.

IRCC is also developing a specific eLearning training product to address training needs around the seizure of documents by citizenship officers.

**RECOMMENDATION 3: That, by 31 March 2017, the *Department of Immigration, Refugees and Citizenship Canada* and the *Royal Canadian Mounted Police* report to the House of Commons Standing Committee on Public Accounts the optimal timing for criminal clearance in the citizenship process, and confirm that it has been implemented in their procedures.**

In the Government Response, IRCC and the Royal Canadian Mounted Police (RCMP) indicated they were working together to review the optimal timing for criminal clearances during the citizenship application process.

As a result of this review, the analysis demonstrated that the risk of a prohibited individual receiving citizenship is proportional to the amount of time elapsed between obtaining the clearance and the individual becoming a Canadian. To reduce the risk, IRCC will decrease the validity period of the criminal clearance. In the event the clearance expires, a new one will be required. In addition, the clearance will be sought later in the citizenship process; consequently further reducing the risk. System functionality and processing instructions are being updated to complete the implementation of these changes.

Finally, the possibility that a prohibited individual receives citizenship is further reduced by the information sharing processes in place that are outlined under Recommendation 4.

**RECOMMENDATION 4: That, by 31 March 2017, the *Department of Immigration, Refugees and Citizenship Canada* and the *Royal Canadian Mounted Police* report to the House of Commons Standing Committee on Public Accounts the failsafe process that they have implemented for sharing all information with one another, about all criminal charges against permanent residents and foreign nationals.**

In the Government Response, IRCC and the RCMP indicated that they have been reviewing their processes regarding the sharing of information about criminal charges against permanent residents and foreign nationals. The Response also noted that while IRCC and the RCMP are working to improve their processes and deter new and emerging forms of fraud, there are challenges in designing a process that is “failsafe.”

IRCC has taken steps to ensure that information on criminal charges against permanent residents and foreign nationals is available to citizenship officers. Procedures are currently in place for the RCMP to share information on criminal charges with the CBSA when there is a fingerprint match against the immigration database. The relevant information is subsequently made accessible to citizenship officers for the purpose of citizenship decisions. In addition, as IRCC and the CBSA move toward the expanded use of biometrics in 2018, IRCC will be well positioned to receive an increased volume of notifications from the RCMP.

While the RCMP has taken important steps to promote the sharing of information with respect to permanent residents and foreign nationals charged with a crime, the implementation of a notification process is limited by the following factors:

- Information regarding criminal charges is gathered by non-RCMP policing partners at the municipal and provincial level.
- Police services have the discretion not to share information with IRCC due to operational requirements or concerns about potential violations of the *Canadian Charter of Rights and Freedoms*.

The RCMP has made significant efforts to mitigate any gaps in the existing notification process. These mitigation efforts have been underscored internally to the RCMP to emphasize the importance of sharing information related to criminal charges against permanent residents or foreign nationals in order to prevent fraud within the citizenship application process. The RCMP has also informed the Canadian Association of Chiefs of Police of the important role it plays in protecting Canada’s Citizenship Program.

**RECOMMENDATION 5: That, by 31 March 2017, the *Department of Immigration, Refugees and Citizenship Canada* and the *Canada Border Services Agency* confirm to the House of Commons Standing Committee on Public Accounts that the Agency is sharing with the Department all information about immigration fraud investigations into individuals applying for citizenship; and that the Agency do so without jeopardizing those investigations.**

The Government Response acknowledged the need to share relevant information on immigration fraud in a timely and accurate manner.

IRCC and the CBSA confirm that information about immigration fraud is shared with IRCC, in a timely manner, without creating a negative impact on ongoing investigations.

Specifically, IRCC and the CBSA collaboratively developed procedures for their respective organizations, which outline the process for sharing specific information concerning subjects of investigations. On December 19, 2016, the CBSA published an Operational Bulletin outlining directions for investigators to provide IRCC with specific information on individuals including consultants and their clients under investigation for *Immigration and Refugee Protection Act* criminal offences. The CBSA will disclose information to IRCC related to criminal investigations that will allow IRCC officers to review the applicant's eligibility for permanent residence or citizenship status. This is being done in a manner to avoid jeopardizing ongoing investigations.

Finally, the Information Sharing Annex under the Memorandum of Understanding between IRCC and the CBSA has been revised to include provisions on the sharing of information on individuals who are under investigation or linked to an investigation for immigration fraud.

## **Conclusion**

In summary, IRCC, the CBSA and the RCMP are pleased to report to the Committee that significant progress has been made to implement the recommendations of the Auditor General. Several initiatives have been undertaken to review current fraud risk indicators and develop new ones. It is expected that these improvements will not only identify fraud more effectively, but also deliver the Citizenship Program more efficiently.

IRCC will continue to work closely with the CBSA and the RCMP to mitigate fraud and further enhance fraud prevention and detection in the Citizenship Program.

The Government recognizes the valued status and many benefits that come with Canadian citizenship and is committed to ongoing enhancements to the integrity of its Citizenship Program.