



Faces of Advocacy: Authorizations Index

Report on the Processing of Extended Family Travel Exemption Authorization Applications in the First Two Weeks

Authors: Nathalie Picard, Kate Lee, Justin Griffith, Dr. David Edward-Ooi Poon

Contributions: Kaylee Carson

With Data from October 26 2020

Introduction

On October 8, 2020 the Immigration, Refugees and Citizenship Canada (IRCC) began the new Extended Family Exemption process. This exemption allowed Canadian citizens and permanent residents to safely reunite with their foreign national siblings, adult children, grandparents, and committed partners in Canada. This process consists of signing a notarized declaration and submitting it to the IRCC along with information about the foreign national for travel authorization to enter Canada.

There were two core rubrics given by the IRCC to gauge the Extended Family Exemption program's success:

- 1) The Canadian government's official website states that the IRCC will contact the applicants within 14 business days of their application.
- 2) Government officials confirmed with the Faces of Advocacy founder, Dr. David Edward Ooi Poon, that these travel authorization requests would be processed in chronological order based on submission time. Additionally, IRCC officials said that any requests for extra information would not move an applicant to the end of the "queue."

However, internal data collected in the Faces of Advocacy group on the week of October 26 2020 revealed that the IRCC is failing to meet the 14 business day timeline for many, and has not been processing applications in chronological order.

Data Collection and Methodology

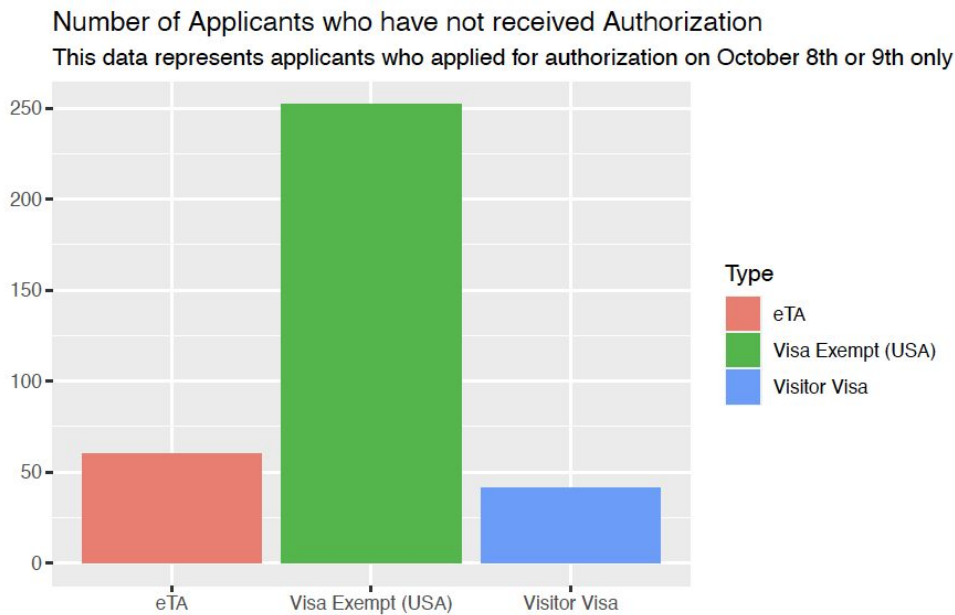
Because the IRCC has not provided official data regarding the Extended Family Exemption process, the data included in this review were collected from three surveys of the 8500+ members of the Faces of Advocacy organization.

1. Approval Data - completed by individuals who have received travel approval (collected through Google Form)
2. Submission Data - completed by individuals who have submitted an application (collected through a Facebook poll)
3. Early Application Data - completed by individuals who submitted their application on October 8th or 9th have had not received approval by October 26th (collected through a Google Form)

These surveys were conducted on a voluntary basis, and there is no guarantee that people completed both polls. However, we actively reached out to group members who received authorization in order to gain representative numbers. Where any discrepancies may have arisen, we relied on the more conservative assumption to reconcile the data. For instance, if the approval rating indicated by the data was over 100% on a given day, we reduced the number of applicants who have not received approval to reconcile to 100% approval. Where dates were entered incorrectly in the survey, if the error was a formatting issue (November 10, 2020 vs. October 11, 2020, for instance), we updated the data accordingly. If the entry date was irreconcilable (for example, a future submission date), we discarded the observation. These issues represent less than 5% of total records. The Approval Data contains 562 records, the Submission (pending) data includes 1,080 records and the Early Application Data includes a subset of the pending data containing 353 observations. These disclosures serve as a warning that all data and statistics serve as our best estimates based on collected data because the IRCC has not been transparent with official numbers.

Data Analysis

Issue 1. The IRCC is unable to meet their stated 14 business day response time.



Source: Data collected by Faces of Advocacy up to October 26, 2020

Figure 1 illustrated above

Figure 1 shows that on October 26, 2020, there were over 350 foreign nationals still waiting on a response from IRCC despite many submitting on October 8 or 9. With only one business day left to process October 8 applications, the IRCC was unable to meet the timeline that they established for themselves.

Looking at Figure 1, it is evident that there are a disproportionate amount of US applicants waiting for approval. Part of this disparity is due to the smaller amount of eTA and Visitor Visa applications, yet it is also an interesting discovery considering US residents normally do not need approval to enter Canada. This indicates that the IRCC was unprepared to process applications from a visa exempt country, with no prior system established to sort American applications. This lack of preparedness for American applications is evident in the emails from the IRCC received by over 200 American applicants. The emails contained misinformation and asked American applicants to provide information that the IRCC does not provide to American such as eTA or UCI numbers (see Appendices 1 and 2 for copies of these emails).

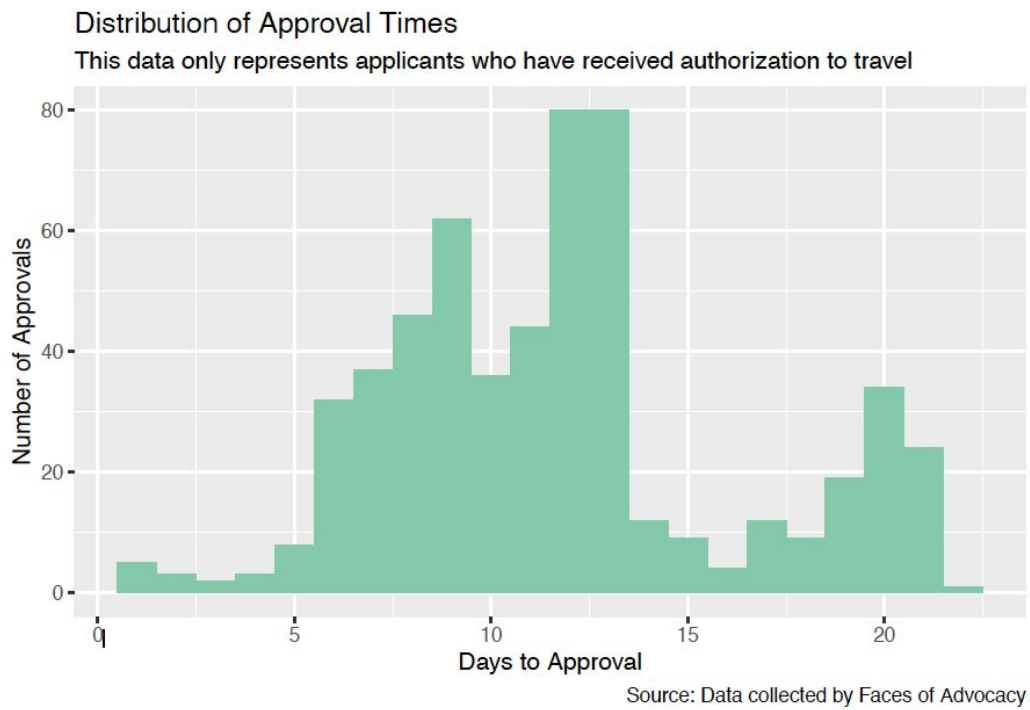
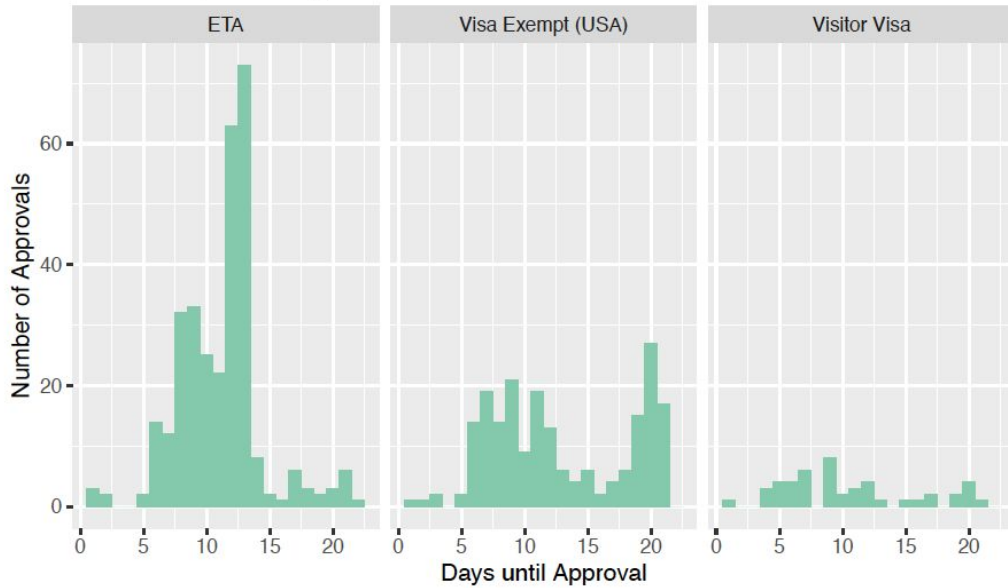


Figure 2 illustrated above.

After 12 business days of processing applications, by October 26 it was clear that the IRCC was not processing the earlier applicants first. Figure 2 illustrates that the median processing time for all applicants has been 12 days thus far, with a standard deviation of 4.5 days. Although, there appears to be a sizable amount of approvals occurring within the 17 to 21 day area. The hundreds of applicants from Figure 1, who had not received written authorization by October 26 despite applying on October 8 or 9, do not have their wait times illustrated in the figure above.

Distribution of Approval Times

This data represents applicants who have received authorization to travel

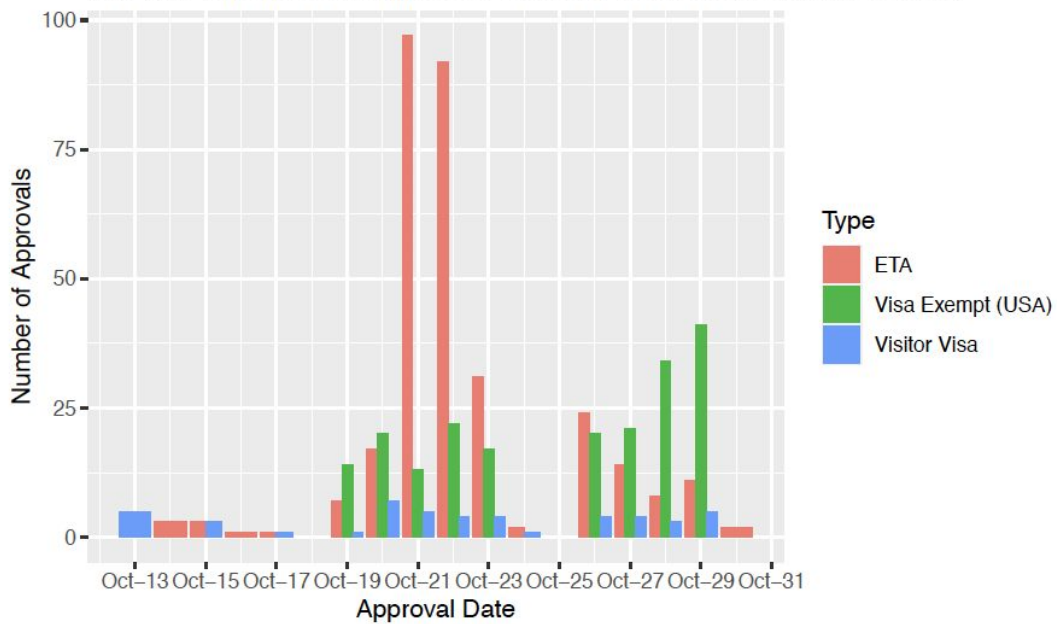


Source: Data collected by Faces of Advocacy

Figure 3a illustrated above

Number of Approvals by Day and Type

This data only represents applicants who have received authorization to travel



Source: Data collected by Faces of Advocacy

Figure 3b illustrated above

In Figures 3a and 3b it is clear that the distribution of approval time is also dependent on what stream an application was made through. In tracking the authorizations of eTA applicants, Visitor Visa applicants and Visa Exempt applicants, the Faces of Advocacy group saw extreme disparities in the numbers of applicants being authorized in the eTA stream as opposed to the Visa Exempt, particularly on October 21st and 22nd as is evidenced in Figure 3b. According to Figure 3a eTA applicants saw a large majority of approvals within the 10-14 day wait period, however Visa Exempt applicants never see a large number of approvals for a single wait period and have an uneven spread of wait times from 5 days up to 20.

Meanwhile, the number of eTAs processed in total over the course of the first 12 business days was greater than the Visa Exempt applications despite having half of the applicant pool. On the date this data was collected, eTA approvals continued to overshadow visa exempt applicants by one hundred despite the large number of Visa Exempt applicants waiting to be processed. *This further reveals the suspected lack of process established by the IRCC in processing specifically visa exempt American applicants.*

Issue 2. The IRCC processed applicants out of order.

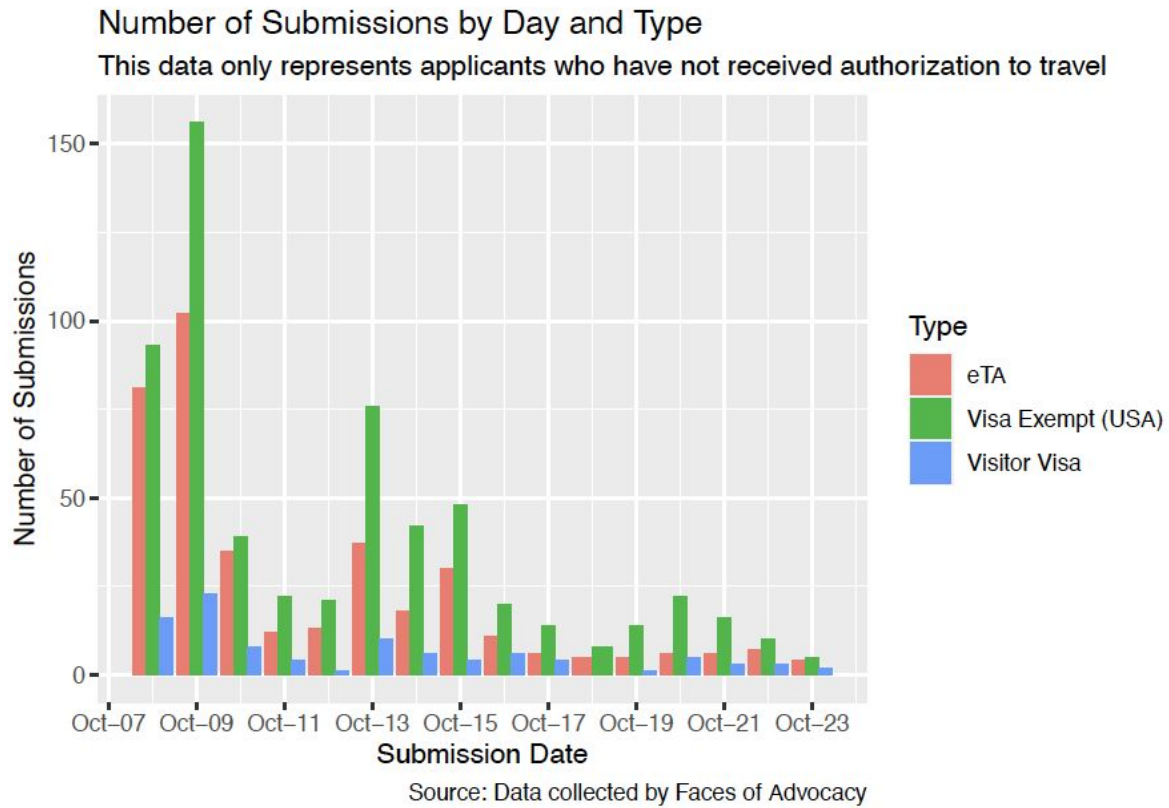


Figure 4a illustrated above

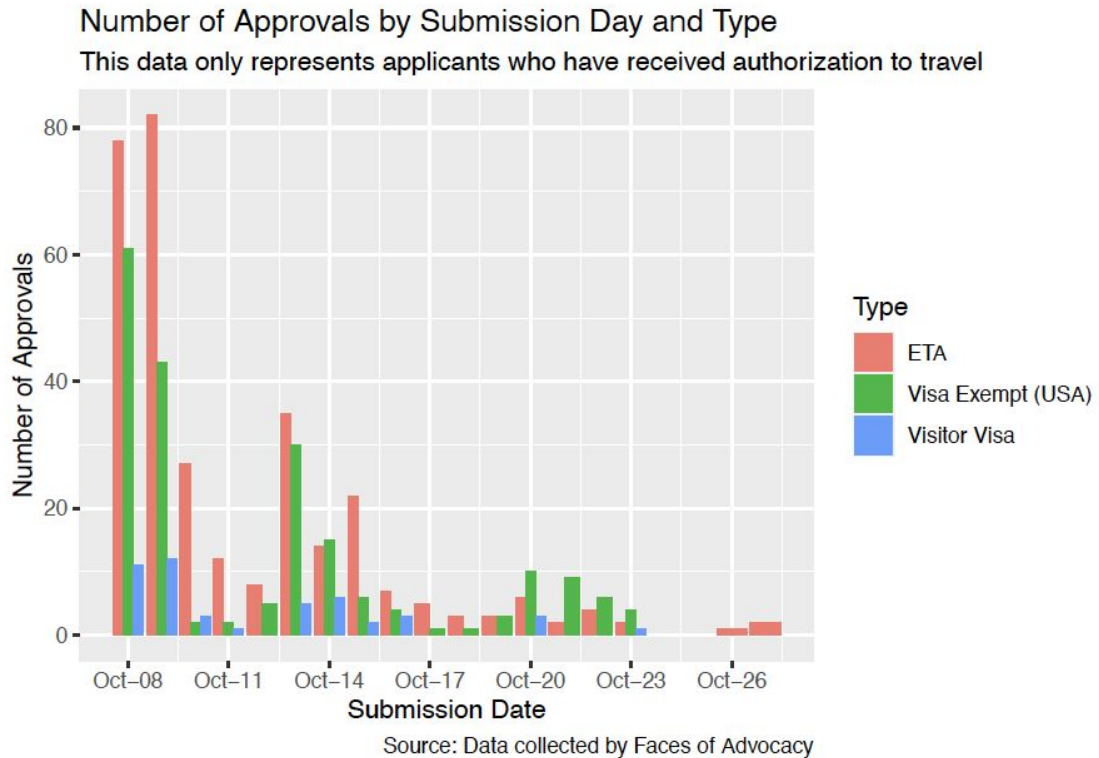


Figure 4b illustrated above

This is a trend that ultimately led to the failure to meet the 14 business day promise made by the ministry. As illustrated in Figure 2, **the discrepancy in processing times meant that IRCC left many early applications untouched while processing more recent submissions.**

The IRCC is inconsistently processed applications out of the 'queue' order, as is evident in Figure 4b where over 200 applications submitted between October 12-26 were processed while hundreds of applicants who submitted on the October 8-9 were left unsure about whether their applications had been forgotten. Due to the IRCC's promised 'queue' this *generated confusion and anxiety amongst members who had understood that early applications would be processed first.*

Conclusion and Recommendations

The IRCC's failure to process applicants in order of the 'queue', using a consistent process, and within the 14 business day window have caused *undue stress for applicants*. In addition to the data shared above, individual responses that the IRCC sent to applicants asking for extra information when everything was accurately included¹, or stating that American applicants didn't require authorization to cross the border² created confusion amongst applicants who didn't have clear instructions on how to proceed or if the information that they were receiving from an official government email should be trusted. The Faces of Advocacy organization evolved into a de facto ombudsman, becoming the source for answers not given publicly by the government ministry.

Dr. David Edward-Ooi Poon's recommendations on October 27, 2020 at the Standing Committee for Citizenship and Immigration call for large-scale IRCC Infrastructure Reform. To address the two failures outlined in this paper, the Faces of Advocacy recommend:

- 1) A clear, transparent process to immediately have applications processed on the 14th business day. At the moment the call center, Members of Parliament, webform, and email systems all appear disconnected and therefore cannot guarantee processing time.
- 2) Publicly available IRCC processing totals identifying the dates in which processed applications were received, to ensure in-order processing.
- 3) If either criteria cannot be met, the notarized declaration of extended family should be considered sufficient to approach the border and CBSA agent, similar to how a marriage or birth certificate does not require IRCC approval.

¹ See Appendix 1: IRCC email requires information excluded from application instructions

² See Appendix 2: IRCC email incorrectly informs American applicants they don't need authorization

Appendix 1:

[IRCC Application Requirements for Visa Exempt Visitors:](#)

If you don't need a visitor visa or eTA (for example, US citizen)

If you don't need a visitor visa or eTA to travel to Canada, you still need a written authorization if you're coming to unite with an

- extended family member
- immediate family member who is in Canada temporarily if you're travelling from any country other than the US

Note: If you're coming from the US to unite with an immediate family member who is in Canada temporarily you **do not** need written authorization.

Send your request for a written authorization to this email address: IRCC.COVID-TravelExemptions-Exemptionsdevoyage-COVID.IRCC@cic.gc.ca.

Make sure you include

- your full name
- your date of birth
- your passport number
- a detailed reason for travel
- the dates you plan to travel
- where you live now (current country of residence)
- your supporting documents to show you're eligible to travel to Canada at this time (for example, the application for authorization and statutory declaration for extended family members)

We'll contact you within 14 business days of getting your **complete request**. If your request is missing required information, it may take us longer to respond.

If we approve your request for a written authorization, we'll send it to the email address you used to contact us.

Email us only if you're [eligible to travel to Canada](#) at this time. We won't respond to any other inquiries.

Application submitted by American applicant, containing all required pieces:

Tyler [REDACTED] Thu, Oct 8, 8:00 PM ★ ↩ ⋮

to IRCC.COVID-TravelExemptions-Exemptionsdevoyage-COVID.IRCC, me ▾

Hello,


I have attached all required documentation for the application concerning extended family members entering Canada. If you require further information or evidence of our committed romantic relationship, please see photos included in this [folder](#).



Full name: Tyler [REDACTED]
Date of birth: August 21, 1988
Passport number: 988810020

Detailed reason for travel: To visit and stay with my partner of four years in Canada and spend time together there.
The dates you plan to travel: In the next week or weeks, as soon as the written authorization is provided.
Where you live now (current country of residence): United States of America
Supporting documents to show you're eligible to travel to Canada at this time: Attached is the application for authorization and statutory declaration for extended family members.

Please let me know if you need anything else.


Tyler [REDACTED]
Cell: [REDACTED]
Email: [REDACTED]
[LinkedIn](#)

2 Attachments 



The IRCC requested further information that was not included in their original instructions:

From: COVID-Travel Exemptions / Exemptions de voyage-COVID (IRCC) <IRCC.COVID-TravelExemptions-Exemptionsdevoyage-COVID.IRCC@cic.gc.ca>
Date: Thu, Oct 22, 2020 at 9:45 AM
Subject: RE: Extended Family Member Application for Written Authorization for Entry into Canada - Tyler [REDACTED]
To: [REDACTED] <[REDACTED]>

 Government of Canada / Gouvernement du Canada

Subject: Authorization for Exemption from Canadian Travel Restrictions for the Purpose of Family Reunification

Good day,

Please be advised you have not submitted all the required information or documents for us to assess your eligibility to be exempt from the restrictions to travel to Canada.

Therefore, we are unable to process your request.

If you wish to continue applying for an Authorization for Exemption from Canadian Travel Restrictions for the Purpose of Family Reunification, you need to resubmit your request and include the missing information or document(s):

- Full name
- Date of birth
- Client ID number (UCI)
- Application Number
- Passport Number
- Detailed purpose of travel
- Proof of relationship with an immediate or extended family member in Canada
 - *Note: If you are applying for reunification as an [extended family member of a Canadian Citizen or permanent resident](#), you must also provide a complete signed statutory declaration attesting to your relationship.*
- Proof of Citizenship or Permanent Residence of the extended family member
- Proof of Temporary Resident Visa or Electronic Travel Authorization (if applicable)
- Your current country of residence

Appendix 2:

IRCC sent incorrect information to American applicants:

Request to be exempt from Canada's Travel Restrictions for the Purpose of Family Reunification 2

La version française suit le texte anglais.

Good day,

Thank you for your enquiry.

As someone travelling to Canada from the United States, you do not need a written authorization from the Government of Canada.

Upon your arrival to Canada, an officer from the Canada Border Services Agency (CBSA) will determine whether you are permitted to enter Canada.

Please review travel requirements and required documentation on our website: <https://www.canada.ca/en/immigration-refugees-citizenship/services/coronavirus-covid19/travel-restrictions-exemptions.html>.

If you're travelling by air, you will need to pass a health check before you're allowed to board your flight. [All air passengers](#) must have a [non-medical mask or face covering to cover their mouth](#) and nose during travel.

Anyone who shows symptoms of COVID-19 will not be allowed to travel to Canada. Do not travel to Canada if you feel sick. If you are sick, delay your travel plans until you are feeling well.