

ACCESS AT ISSUE: THE UNSUSTAINABLE STATUS QUO

Systemic Investigation into Immigration-Related Access to Information Requests

Special Report to Parliament
May 7, 2024



Information
Commissioner
of Canada

Commissaire
à l'information
du Canada

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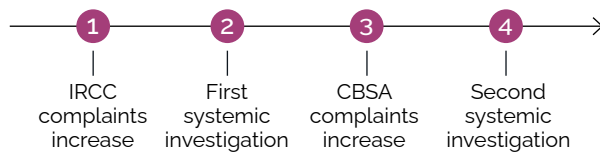
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Why a second systemic investigation?



Information Commissioner's update

Three years after my systemic investigation into Immigration, Refugees and Citizenship Canada (IRCC), requesters continue to use the access to information system to obtain information related to their immigration applications. What has changed is that not only are these requests being made to IRCC, but also to the Canada Border Services Agency (CBSA), which has access to the same data through shared tools.

As a result, the Access to Information and Privacy (ATIP) units of both institutions are being negatively impacted by IRCC's lack of progress in introducing a more efficient way of providing requesters with information concerning their applications than through the *Access to Information Act*. Currently, there is little indication that this will change anytime soon.

From April 2017 to February 2020, I observed a dramatic increase in access to information requests to IRCC for records related to immigration applications. My systemic investigation into this state of affairs resulted in the May 2021 Special Report to Parliament entitled [Access at issue: Challenging the status quo](#).

At the time, the overwhelming strain on ATIP resources at IRCC and the high volume of complaints submitted to my office against this institution led me to make recommendations aimed at addressing performance, process and resource issues. More importantly, noting that there are more efficient and effective ways of providing requesters with information concerning their applications than the *Access to Information Act*, I also made this recommendation:

"Implement or augment IRCC's plans and strategies to improve the availability of client immigration information so as to alleviate undue pressure on the access regime."

Since then, CBSA has seen its own dramatic increase in access requests related to immigration information. A surge in complaints alleging CBSA was not responding to these requests within legislated timelines under the Act led me to launch another investigation in 2023.

With this second systemic investigation into access to immigration-related information now concluded, there is no doubt in my mind that CBSA is being adversely affected by the "status quo" that continues to prevail at IRCC, and more specifically, the lack of progress on providing applicants with an alternative method of obtaining information related to their file. The response from the President of the CBSA is included as an annex to this special report. My findings and recommendations can be found in the [final report of the investigation](#).

Progress delayed brings challenges on multiple fronts

Back in March of 2021, in response to my IRCC systemic investigation, the Minister of Immigration, Refugees and Citizenship indicated that, among other planned measures, the new Digital Experience Platform and full roll out of the new MyAccount functionality was planned for 2023–2024. This new platform was meant to meet the objective of making information directly available to IRCC clients by means other than through an access to information request.

IRCC's plan to deliver these enhancements last fiscal year seemed a reasonable and achievable objective. It was also in line with the Government of Canada's [Digital Ambition](#), which seeks to make it easier for citizens and clients to interact with the public service and gain digital access to high quality, accessible, and efficient government services. The 2023 Ambition identified achieving measurable progress at foundational and transformational programs used to deliver immigration services as a priority.

Unfortunately, in August of 2023, IRCC indicated that it will take approximately two more years before this project is fully implemented, as explained in the response from IRCC Associate Deputy Minister included as an annex to this report. In the meantime, access requests made to IRCC continue to increase each year. In fact, IRCC access to information requests far outnumber those made to all other institutions combined. To make matters worse, CBSA now appears to be on a similar trajectory, as illustrated below.

As I previously identified in my IRCC systemic investigation, requesters' efforts to obtain information stored in the Global Case Management System (GCMS)—the tool

used to store and manage data related to immigration applications—is at the heart of the ongoing surge in requests. Since both IRCC and CBSA have access to this system, applicants or their representatives are able to submit access requests to either of these institutions, or both of them, regarding the status of an application.

IRCC, which has dealt with these types of requests for several years, has shown improvement in processing such requests, leading to a reduction in complaints. However, in the conclusion of my 2021 special report, I cautioned against ascribing too much value to this type of progress, noting:

"Simply attempting to make the IRCC's access to information system more efficient cannot be an end in itself. Instead, efforts should be concentrated where they are likeliest to find success. This means finding alternatives to access requests that provide information requesters are seeking, while simultaneously exploring ways to address other shortcomings in the system where they currently exist."

The results of this second systemic investigation into access to immigration-related information show that my advice was not fully heeded, and that the more challenging task of driving progress in developing such alternatives has not kept pace with these increases in efficiency in the processing of requests. It also puts the spotlight on a subject I have raised on previous occasions: the federal government must innovate and adopt a fresh approach to providing the information Canadians—and potentially, future Canadians—seek.

The *Access to Information Act* was never meant as a substitute for providing individuals what they need and expect from the federal government: timely access to the information they need to make decisions that affect them.

In the same way historians use the [Act to get around the fact that Canada does not have a declassification program](#), IRCC's clients use it to gain access to information about their immigration application. This information should be made available to them directly through modern digital service delivery methods.

There are efficient ways to provide useful information to the public engaged in individual processes with the government that avoid adding pressure on the already burdened access to information system.

For example, Canada Revenue Agency's online portal allows taxpayers to retrieve their tax information without filing an access request.

The already overwhelmed access to information system is no substitute for purpose-built tools and mechanisms that allow individuals to obtain the information they need, quickly and easily.

After reviewing a recent [report from the Auditor General on outdated government information technology \(IT\) systems](#), I also have doubts that the Government will promptly address the underlying issues now causing an increase in access requests at CBSA. The [former Chief Information Officer's comments](#) on the Government of Canada's failure

to modernize its IT systems over the past 13 years only deepens these doubts.

Indeed, until the situation is fully addressed by IRCC and clients have a straightforward means of accessing immigration-related information, both IRCC and CBSA can anticipate a persistent high demand for this type of information through access to information requests.

To be clear, even if the hike in access requests to CBSA originates from challenges at IRCC, it does not relieve CBSA from its responsibility under the *Access to Information Act* to take all measures required to respond to such requests within legislated timelines.

A call to action for the sake of an overwhelmed access to information system

After two systemic investigations focused on requests for immigration-related information, I trust that parliamentarians now have a better understanding of the urgent need to bring the IRCC transformation project to completion. While planning is an important step in any complex project, eventually plans must result in concrete action, greater efficiency, and tangible results.

Canadians are entitled to government services that meet their needs, and it is reasonable to expect that IRCC's efforts at modernizing its client portal, GCMS, and related services will eventually stem the ongoing surge in requests. As I have stated on numerous occasions since the beginning of my mandate, the best access request remains the one that did not need to be made in the first place.

For the sake of an already overwhelmed access to information system, I call on the Government to take the necessary measures to prevent any further delays in the completion of this key technological transformation project.

Clearly, the status quo is unsustainable.



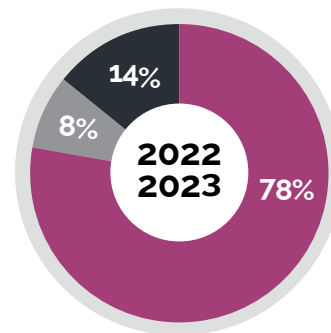
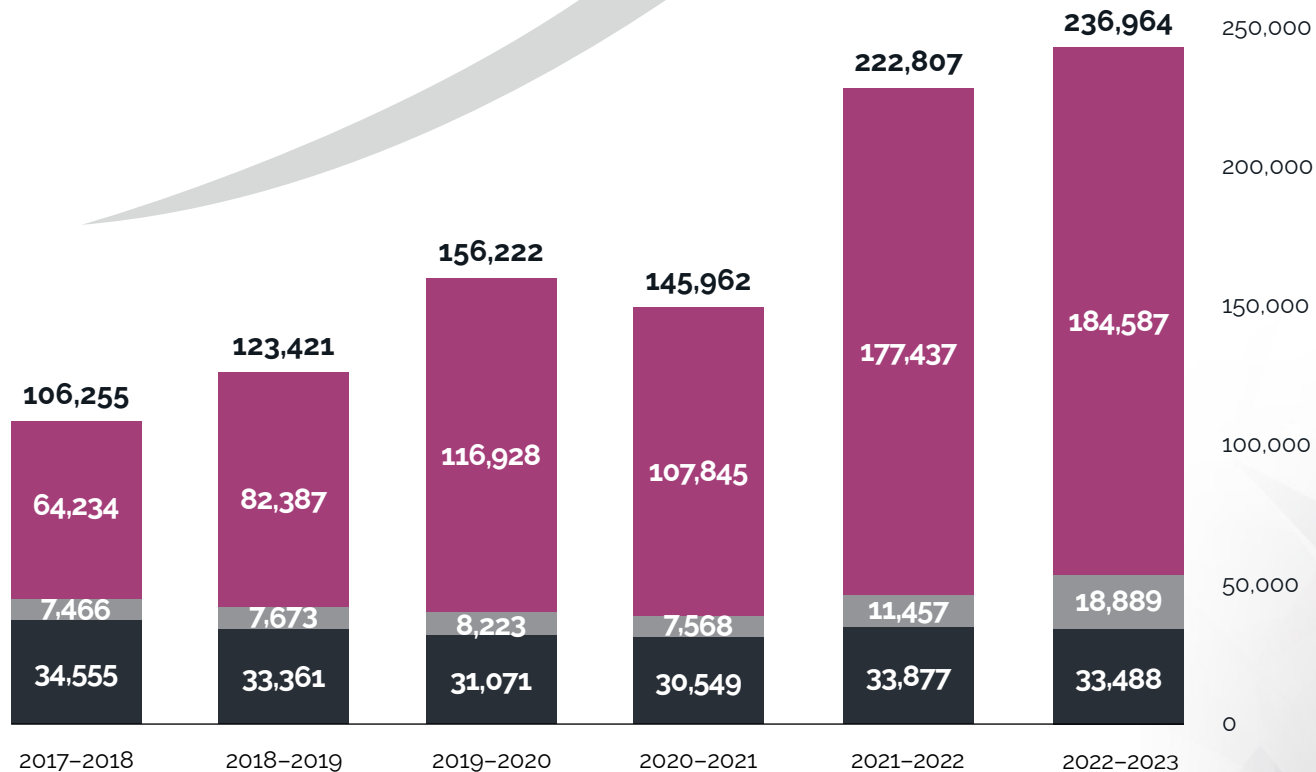
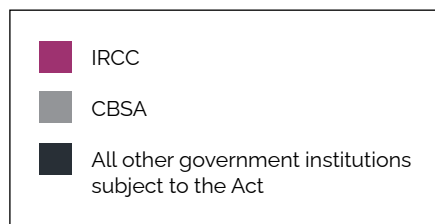
Caroline Maynard

Information Commissioner of Canada

Numbers at a glance

Tracking the surge

Access requests received, 2017–2018 to 2022–2023*



Access requests submitted to IRCC and CBSA have **more than doubled** since 2017–2018

* Statistics for fiscal year 2023–2024 are not yet available.

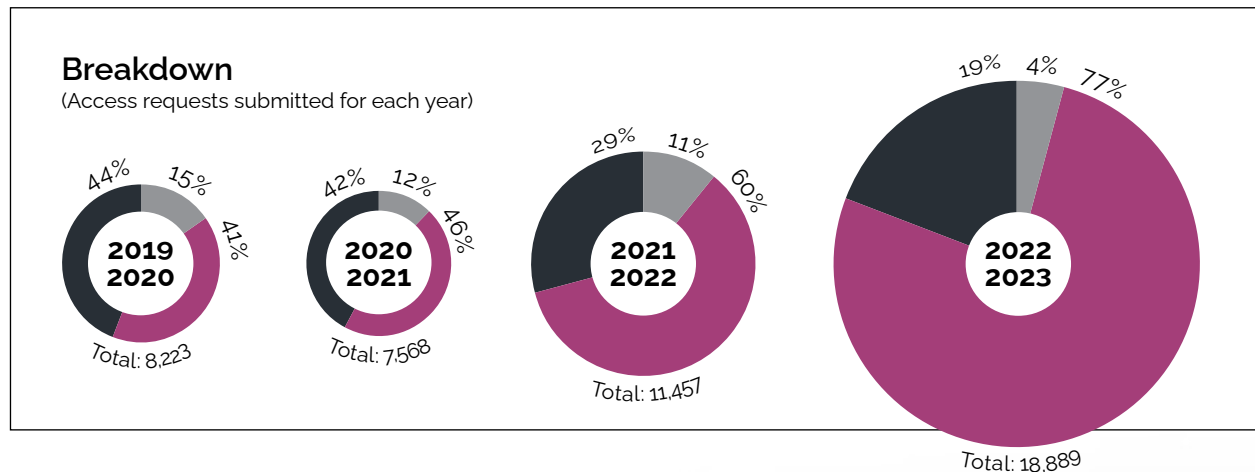
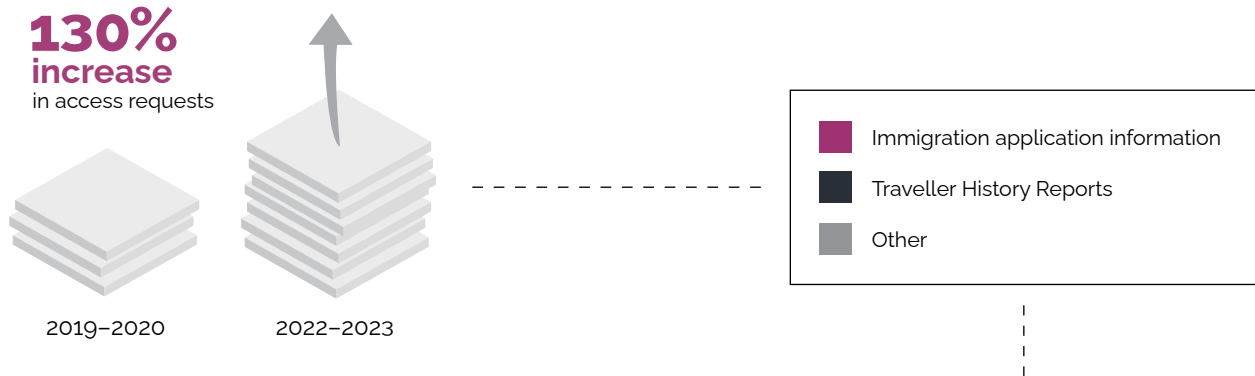
Canada Border Services Agency

CBSA has historically been in the top five institutions in number of access to information requests received annually. Between 2019–2020 and 2022–2023, there was a 130% increase in requests directed to CBSA.

Since 2021–2022, requests related to immigration applications have constituted the majority of the access requests submitted to CBSA, overtaking requests related to Traveller History Reports (THRs). CBSA collects information on THRs as a record of a traveller's entries and/or exits.

CBSA also carries a significant backlog of access requests. In fact, the number of outstanding access requests carried over from one year to another almost doubled between 2021–2022 and 2022–2023. This growing backlog demonstrates that CBSA's ATIP unit has not been able to keep pace with the workload generated by the increase of requests for immigration-related information.

In 2023–2024, the Office of the Information Commissioner (OIC) registered 762 complaints against CBSA. The Agency currently has more pending complaints against it than any other institution, totalling 530 complaints.



In 2023–2024,
the OIC registered
762 complaints
against CBSA



530 complaints
are still pending

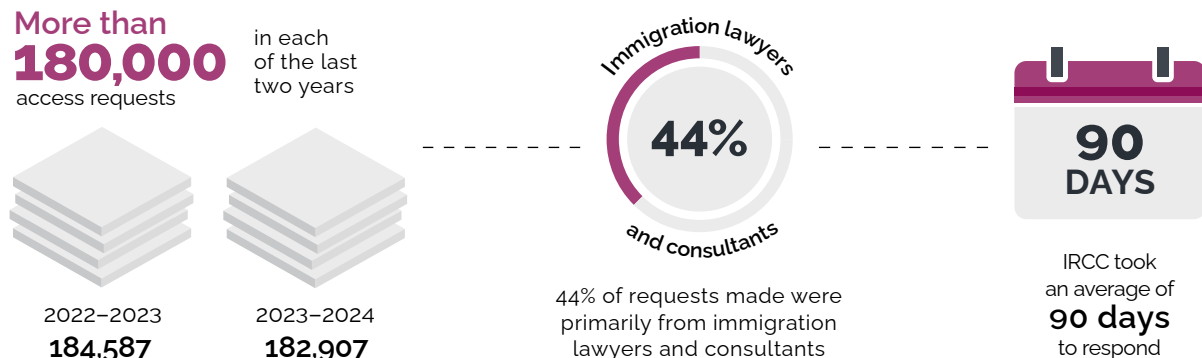
Immigration, Refugees and Citizenship Canada

On April 18, 2024, IRCC provided the OIC with its statistics for fiscal year 2023–2024. Throughout that year, the private sector, primarily immigration lawyers and consultants, represented the largest source of access to information requests to IRCC with 44% of requests made. The total number of access requests remained high, with IRCC receiving over 180,000 requests in each of the last two years. For requests closed in 2023–2024, IRCC took an average of 90 days to respond. Moreover, IRCC started the current fiscal year with a significant backlog of 51,192 unanswered access requests.

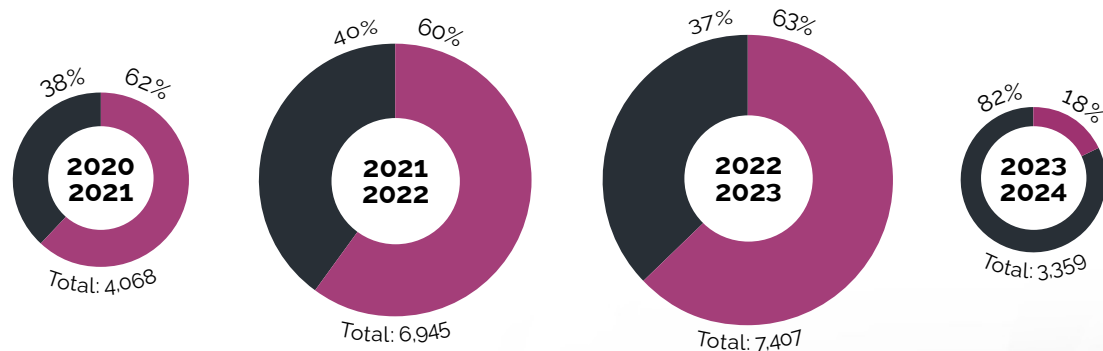
In addition, with the extension of the right of access to personal information to foreign nationals under the *Privacy Act* in July 2022, IRCC saw an increase of 188% in requests for personal information from 24,164 in 2022–2023 to 69,720 requests in 2023–2024.

IRCC accounted for more than 50% of the complaints registered by the OIC each year between 2019–2020 and 2022–2023. However, the 614 complaints registered against IRCC in 2023–2024 represented only 18% of all complaints. This reduction is in contrast to the persistently high number of access requests received.

While the OIC is now receiving fewer complaints against IRCC, the high volume of access requests received by IRCC and the significant size of the institution's backlog of requests are two more reasons why efforts should be focused on providing applicants with the information they are seeking by means other than through the access system.



IRCC complaints as a percentage of total complaints registered by the OIC



■ IRCC
■ All other government institutions

Progress report

A number of improvements have been introduced by IRCC since the 2021 Special Report:

- Expanding the **application status trackers**, which provides information about the general status of an application, for most lines of business. That said, it does not provide the reasons behind refused or delayed applications which, more often than not, is the information being sought.
- Testing the **proactive disclosure of officer's decision notes** for some refused Temporary Resident Visa (TRV) and Study Permit applications in order to reduce the need to file access requests. IRCC reported they found a 57% reduction in the number of access requests made by the first TRV study group.
- Implementing measures to **improve client communications** by modifying its Processing Times Tool to more accurately reflect up-to-date processing times for client applications. IRCC reports that by providing accurate processing times helps to manage expectations, decrease client anxiety and has resulted in reduced need for clients to make access requests.
- Upgrading and developing **new tools to process the high-volume of access requests** more efficiently, changes to the online access request form, and the implementation of Robotic Process Automation (RPA) tools. RPAs perform low-complexity/high-volume tasks such as data entry, file and folder operations, and other non-decision-making processes.
- According to the information received from IRCC in April of 2024, "a new online account being rolled out (beginning Spring 2024) will provide clients with access to more information than they have currently, including the case status information and officer decision notes mentioned above". IRCC expects that the **Digital Platform Modernization** initiative will "reduce the impetus for clients to submit access requests".

IRCC

The CBSA's ATIP unit has also made several improvements:

- In 2021–2022, CBSA **increased funding to its ATIP office**, starting with surge capacity funding which increased the following year. According to the [CBSA's annual report on access to information](#), the cost of its access program increased from \$2.3 to \$3.3 million between 2020–2021 and 2022–2023, with plans to stabilize the funding of its ATIP unit in 2024–2025 through an increase in its A-base funding.
- CBSA indicates that it **continues to invest in additional RPAs**. According to CBSA, the implementation of these tools, designed to automate repetitive processes, will enable the reallocation of human resources to tasks requiring decision-making. CBSA estimates that these tools will do the work of 15 full-time employees. Additional RPAs are planned for 2024–2025.
- In November 2023, CBSA **updated its delegation order** under section 95 of the *Access to Information Act*, giving the power to respond to access requests to more individuals in its ATIP unit. This allows individuals at more junior levels to make decisions when responding to access requests and generally improves efficiency.

CBSA

Conclusion

Insufficient progress has been made in improving the availability of client immigration information in the three years since the May 2021 special report entitled [Access at issue: Challenging the status quo](#) was tabled.

IRCC's efforts at modernizing its client portal, GCMS, and related services has **not resulted in a decrease** in the number of access to information requests received by CBSA or IRCC for immigration information.

In the absence of any alternative, hundreds of thousands of access requests continue to be made through an already overburdened ATIP system.

Removing these requests from the access system by making the information being sought available through other means would free up significant ATIP resources in both organizations that could be used for other purposes.

For years, IRCC has expressed its commitment to modernizing the technology and processes used to provide information directly to its clients. However, great plans do not always lead to great results and progress has been slow.

IRCC's inability to implement an effective system that would allow its clients to retrieve immigration-related information continues to significantly impact the ATIP operations of both IRCC and CBSA. Information related to immigration applications must be made available directly to these clients, outside of the access to information system.

The Government of Canada must ensure that its modernization initiatives lead to concrete results and improvements in digital client service delivery.

I would like to acknowledge that ATIP officials at both IRCC and CBSA fully cooperated with my Office during the course of this investigation. Based on the observations of my team, I am confident that they are making a genuine effort to deal with the hundreds of thousands of requests made each year.

The progress made by both CBSA and IRCC in increasing the efficiency of their respective ATIP units is commendable. They are, however, focused on treating the symptoms and not on curing the illness.

- Information Commissioner of Canada

ANNEXES

- I Response from the President of the Canada Border Services Agency
- II Response from the Associate Deputy Minister of Immigration, Refugees and Citizenship Canada



Response from the President of the Canada Border Services Agency

Dear Ms. Maynard:

Thank you for your correspondence of February 20, 2024, addressed to the Honourable Dominic LeBlanc, Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs, concerning your initial report on your office's investigation into the increase in complaints against the Canada Border Services Agency (CBSA). Minister LeBlanc asked me to respond.

I accept the important findings resulting from your investigation. Minister LeBlanc and I agree that the CBSA must continue its work to address the high number of complaints as well as to increase the efficiency of the Agency's Access to Information and Privacy Program.

Minister LeBlanc and I accept your recommendations and CBSA will take the following action.

Recommendation 1: Continue to develop Robotic Process Automation tools to improve efficiency.

In February 2024, the CBSA invested in an additional 20 Robotic Process Automation software licences to increase the efficiency of its Access to Information and Privacy Program. The following are examples of the functionality of Robotic Process Automation tools that the CBSA intends to implement in the coming months to increase its processing capacity and efficiency:

- Increased number of Robotic Process Automation tools to open requests;
- New Robotic Process Automation tools to automate the extraction of responsive information from corporate databases; and

- New Robotic Process Automation tools to automate the mailing of responsive records to requesters.

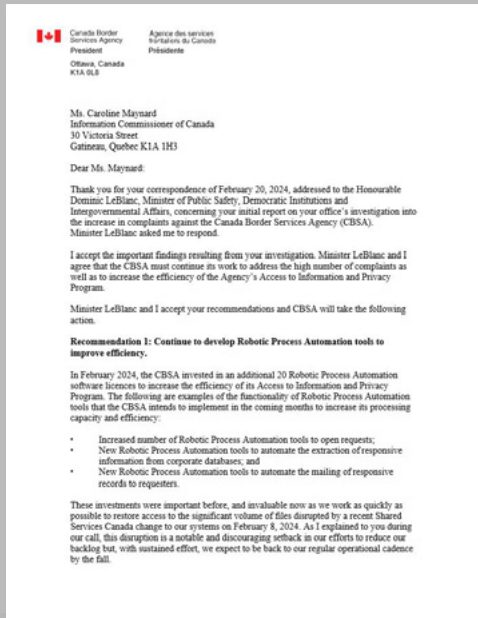
These investments were important before, and invaluable now as we work as quickly as possible to restore access to the significant volume of files disrupted by a recent Shared Services Canada change to our systems on February 8, 2024. As I explained to you during our call, this disruption is a notable and discouraging setback in our efforts to reduce our backlog but, with sustained effort, we expect to be back to our regular operational cadence by the fall.

Recommendation 2: Improve the consistent application of minimal exemptions by collaborating with Immigration, Refugees and Citizenship Canada and the Canadian Security Intelligence Service.

The CBSA has completed preliminary discussions with the Canadian Security Intelligence Service regarding the application of redactions, which will result in fewer redactions to immigration-related records. In addition, the CBSA has completed initial consultation with Immigration, Refugees and Citizenship Canada on a consistent approach to redactions for immigration-related records.

The CBSA expects to complete this work early in the new fiscal year.

Letter from the President of the Canada Border Services Agency received by the OIC on April 8, 2024, that responds to the Commissioner's findings and provides a further update regarding CBSA actions.



Recommendation 3: Collaborate with Immigration, Refugees and Citizenship Canada and other partners to ensure that best practices are adopted in a timely manner.

The CBSA Access to Information and Privacy Office continues to meet with its counterparts at Immigration, Refugees and Citizenship Canada on a monthly basis. As a result of this cooperation, Immigration, Refugees and Citizenship Canada is increasing the sharing of Robotic Process Automation tools to speed the development and implementation of automated processing steps at the CBSA. Additionally, the CBSA has shared its tools related to identification verification requirements with Immigration, Refugees and Citizenship Canada to increase the consistency between departments as it relates to requests for immigration records.

Strong collaboration continues between the CBSA and Immigration, Refugees and Citizenship Canada.

In addition, the CBSA is expected to become the first high-volume Access to Information and Privacy department to implement two government-wide best practices. In November 2023, the CBSA left the legacy platform hosted by Immigration, Refugees and Citizenship Canada and onboarded to the Treasury Board Secretariat-hosted government-wide portal for Access to Information and Privacy requests, joining 260+ other federal institutions on the portal to provide increasingly single-window service to requesters. The CBSA is also onboarding to newly procured Access to Information and Privacy software processing tools in April 2024, to enable Access to Information and Privacy experts to spend more time on quality of service and less time on manipulation of documents in antiquated formats and systems.

Recommendation 4: Secure adequate funding and human resources for the CBSA Access to Information and Privacy Office to meet its legal obligations under the *Access to Information Act* and ultimately eliminate its backlog of access requests.

The CBSA has taken steps to stabilize funding to its Access to Information and Privacy Office. As your report notes, it will take time for these efforts to show results, especially in light of the recent disruption to our systems. In addition to stabilizing funding and investing in modern tools, the CBSA is seeking emergency assistance from partner departments to help it recover from the system disruption. Taken together, at this time, Minister LeBlanc and I believe that the CBSA's Access to Information and Privacy Office has the necessary resources to meet its legal obligation under the *Access to Information Act*. We will continue to monitor progress closely in the months ahead to ensure that this continues to be the case.

Thank you again for your initial report and your recommendations on this important matter.

Yours sincerely,



Erin O'Gorman
President



Response from the Associate Deputy Minister of Immigration, Refugees and Citizenship Canada

Dear Commissioner Maynard:

Thank you for your recent request for a follow-up on Immigration, Refugees and Citizenship Canada's (IRCC) progress in addressing the increase in access requests for immigration application files, in light of your systemic investigation of the Canada Border Services Agency (CBSA).

We are aware that clients frequently make Access to Information or Privacy requests as a means to obtain information about the status of their immigration application or reasons for decisions. We also recognize that this impacts the CBSA, as clients are submitting ATIP requests to the Agency because it has access to the Global Case Management System (GCMS) and is able to respond with fewer delays.

CBSA is one of IRCC's key partners that helps the department carry out Canada's immigration objectives, and the CBSA and IRCC have a long history of collaboration on areas of mutual interest. IRCC's ATIP Division has been sharing information with CBSA about its Robotic Process Automation (RPA) tools and assisting CBSA to refine its ATIP report generated through GCMS and provided to requesters in response to Access or Privacy requests.

IRCC would like to thank you for recognizing that we have made significant strides in addressing the issues raised in the 2020–2021 systemic investigation of IRCC. The Department is continuing to address the recommendations that you made, and as of now, there is only one outstanding item in IRCC's ATIP Management Action Plan.

We are also improving our service delivery by providing clients with timely, accurate channels to better meet their information needs and in turn, reduce volumes of ATI requests submitted across the government. The Department also continues to make progress on reducing both ATIP requests and immigration application backlogs aided by additional staff and processing innovations.

IRCC is implementing a number of initiatives from a client experience perspective, focusing on improving transparency and communication with clients to address the root causes of the increase in access requests and complaints. We continue to expand the availability of Application Status Trackers to clients who have submitted applications for certain permanent and temporary residence programs. IRCC recently completed a project where we tested the proactive release of Officer Decision Notes (ODN) to some refused applicants in the Temporary Resident Visa (TRV) e-Application caseload. This gave clients additional information regarding the reasons for their refusal without submitting an access or privacy request. The results were promising and we are currently exploring options to implement this more widely.

Through the Digital Platform Modernization (DPM) programme, IRCC is redesigning its business to provide a modern client experience and more efficient immigration system, underpinned by new technologies and data capabilities. As part of this work, IRCC will begin rolling-out a new Client Experience Platform in late 2023.

OIC CBSA Systemic Investigation – IRCC Response

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Letter from IRCC Associate Deputy Minister received by the OIC on August 16, 2023, that responds to the Commissioner's request for a follow-up on IRCC's progress in addressing the increase in access requests for immigration application files.

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Please see below answers to the specific questions included in your information request.

What proportion of applications made to IRCC are in the Citizenship Grant or Permanent Resident (Family Class) categories?

Overall, Citizenship Grant and Family Class applications make up a small portion of all applications made to IRCC.

For 2022–2023 to 2023–2024
(data up to June 30, 2023)

- Family Class Permanent Resident Applications accounted for 1%; and
- Citizenship Grant Applications accounted for 3% of all the applications made to IRCC.

What feedback has IRCC received about the new application status tracker tool?

Feedback from IRCC clients and immigration representatives using the Application Status Tracker has been overall positive. Clients understood the general status of their application. However, IRCC is aware that clients continue to seek additional information – including the reason(s) for a decision (i.e., officer decision notes).

We also conducted feedback interviews with a handful of Members of Parliament offices,

after they had begun using the Application Status Tracker for their constituents' files. Overall participants found the Application Status Tracker useful, and would rely on it when providing initial updates to their constituents. It allowed them to save time and provide reassurance to clients with straightforward cases. They also provided some suggestions for improvements which will be used to inform future changes.

In support of implementing the Client Experience Platform, IRCC is working in collaboration with clients and key stakeholders to identify the right level of operational transparency to ensure that clients have access to, and understand, information regarding the processing of their application.

Why application status trackers have not been implemented for other categories, and what timeframe is planned for any intended implementation?

As of March 2023, IRCC has expanded its Application Status Tracker to additional lines of business, enabling more of its clients to self-serve and access information on their application at their fingertips.

The Application Status Tracker is now available to clients in most high-volume lines of business with the recent addition of Temporary Residence (Study, Work and Visitors) applications, the line of business with the highest volume of applications. Other lines of business include Express Entry, Citizenship Grant, and Family Class Spousal Sponsorship, which together represent a significant percentage of IRCC's application intake.

The goal remains to make application status information available to clients in all lines of business. With the third phase of the Digital

Platform Modernization programme, IRCC will be making enhanced application status information available to clients in all lines of business through the introduction of a new Client Experience Platform (CXP). The CXP will provide clients with a single online window to access the department's services, along with a suite of tools to support them in their application journeys. The CXP will be implemented gradually to clients starting in late 2023. It is expected that the enhanced application status information will be rolled-out starting in late 2023 and will be available to clients in all lines of business in 2025.

What changes IRCC has made or intends to make in order for the immigration application process to be more transparent for applicants without the need for access requests?

As part of DPM, IRCC is actively identifying and implementing digital tools and technologies aimed at improving client satisfaction, increasing program effectiveness and maintaining public trust in our services.

This includes introducing the new CXP that will further improve operational transparency by enhancing access to application information, including application status and officer decision notes, and improving the delivery of client communications.

The goal of DPM is to empower clients with more transparency through their new online client account, which will eliminate their need to seek this information through an access request. IRCC is actively identifying and implementing digital tools and technologies aimed at improving client experience, increasing program effectiveness and maintaining public trust in our services.

When a new user account interface with more opportunities to self-serve will be implemented as part of IRCC's Digital Platform Modernization Programme

The new online experience will be gradually introduced to clients starting in late 2023, continuing over two years.

Whether IRCC considers the impact on institutions such as CBSA when establishing procedures related to the processing of immigration applications

IRCC carefully considers the impact on all institutions and stakeholders when establishing procedures related to the processing of immigration applications. In order to ensure potential impacts are not overlooked, IRCC maintains regular contact with CBSA, both at the management and working levels.

Regular bilateral meetings at the senior management level (Deputy Minister, Assistant Deputy Minister and the Director General) to ensure consistent communication between respective organizations. Additionally, IRCC participates in a number of working groups and committees along with the CBSA. This ensures close collaboration on detailed issues of mutual importance.

How and when IRCC intends to follow through on all of its commitments made during my systemic investigation

In February 2023, IRCC updated its [ATIP Management Action Plan \(MAP\)](#), indicating that three more sub-items on the MAP were completed since its December 2021 update.

As of April 2023, item 5.1.2 (Implement the plan to secure adequate short-term human and

financial resources) is considered closed. IRCC restructured its ATIP programs to provide dedicated attention to its main lines of business and to provide oversight to common services for the ATIP Division.

As part of ATIP Modernization within IRCC, the Department recently tested the proactive release of Officer Decision notes to some refused applicants in the Temporary Resident Visa (TRV) e-Application caseload. This gave clients additional information regarding the reasons for their refusal, while at the same time aiming to reduce the number of access requests received. The results were very encouraging, showing a significant reduction (57%) in the number of ATIP requests in the study.

A secondary validation exercise, currently in progress, was launched in April 2023, targeting Study Permits (SP). This project is being done in collaboration with processing agents across the globe through our International Network. We are excited to see the results of this project, as we are anticipating a decrease in Access requests related to Study Permits. Both of these projects are interconnected, as part of the broader client experience initiative that encompasses the re-design of refusal letters.

The goal for both the TRV and SP exercises is to communicate a refusal decision to clients using plain language that is easy to understand, particularly when listing refusal grounds, and to provide meaningful information to clients. IRCC intends for all refused TRV applicants to receive the ODNs as part of their refusal package by the end of the fiscal year.

The remaining outstanding item in the ATIP MAP is:

- 4.1.2 - Reassess and adjust work plan initiatives based on the data modeling and root cause analysis results

This item remains in progress. Several measures are underway to help respond to access to information request volumes and to improve the availability of client immigration information, as part of a Department-wide *open by default* approach.

Anything else that IRCC would like to add in order to help the OIC to understand the root cause of the problem in regards to the improvement of the availability of client immigration information and the sustained need to access immigration application information.

IRCC has undertaken several projects to help understand client needs, behaviours and experience with IRCC products and services as they go through the client journey, with a view to making improvements.

We have provided a few examples below to illustrate how we are improving client experience, specifically with respect to how client anxiety, uncertainty and need for reassurance can drive them to submit access requests, and how we are using client research to address this.

Open Work Permit (OWP) Design Challenge

- IRCC undertook a human-centred research project to understand the client experience of the Open Work Permit applicants. One of the key insights that emerged was that clients want assurance at every stage of their client journey.
- Without automatic updates on their application status, or a website where they can access all information related to their file, clients resort to calling or emailing the Client Support Centre, submitting ATIP requests, or submitting multiple applications in the hopes that one would succeed.

Processing Times

- Processing times remain one of the top issues of concern for clients. Clients use IRCC's Processing Times Tool as a guide to understand how long they are likely to wait for a decision; it is one of the most visited pages on our website.
- Our departmental Client Experience Survey shows that client satisfaction increases when processing times are transparent, accurate, clear and easy to understand. However, when the content is not as clear, it leads to confusion and increased client anxiety which then leads to additional client enquiries, ATIP requests, litigation, and individuals reapplying needlessly.
- Since March 31, 2022, IRCC has updated the processing times tool on a weekly basis to include dynamic processing times for certain permanent residence and citizenship services. Dynamic processing times provide clients with more accurate information and are now calculated based on 80% of finalized applications over the previous 6 months, instead of the last 12 months.
- The Department continues to release updates to the tool including additional lines of business. The Processing Time Tool now incorporates over 50 lines of business providing clients with a general expectation for how long their application should take to be finalized.

- The Department has been conducting usability testing sessions with clients and immigration representatives to help ensure that the information provided in the processing times tool is correctly and confidently understood. This will inform future improvements to the tool.
- The Department is developing and assessing new methodologies, moving away from "backwards-looking" processing times, which look at how long it took to process files in a line of business in the past, to "forward-looking" processing times which can assess variables such as processing output, inventory of cases, and admission levels to model average processing times for the line of business. It is anticipated that forward-looking models provide a better estimate of how processing times will occur for new applicants.
- Personalized processing times would represent a major next step, where individual applications can receive a case-specific estimate of how long it will take for that particular case to be processed. This investment is expected to be developed through DPM in the future.

IRCC is committed to ensuring clients obtain information on their applications in a timely manner and to improving the meaningfulness and clarity of our communication/correspondence to clients. As well, we are implementing permanent and concrete solutions to address the root

cause of the over-reliance on the Access to Information regime. I am positive that our ongoing collaboration with both CBSA and your office will strengthen our client-focused service offerings.

We will continue to keep your office informed of new initiatives to improve Access to Information as they are implemented.

I would like to thank you and your organization for the ongoing open and collaborative relationship you have with the Department, as we work together to improve the ATIP regime, and provide enhanced access to information and a more positive client experience for all.

Yours sincerely,



Scott Harris
Associate Deputy Minister

