



Canadian Association of
Professional Immigration Consultants

L'Association Canadienne des
Conseillers Professionnels en Immigration

CAPIC's Recommendations to CICC for the Improvement of IRB Specialization Program and Mentoring Program Delivery

May 5, 2023

Table of Contents

Background.....	3
Recommendations	5
Conclusion	6
About CAPIC	7
Our Mission.....	7
Our Vision.....	7
Contact Us:.....	7

CAPIC Recommendations to CICC for the Improvement of the IRB Specialization Program and Mentoring Program Delivery

CAPIC acknowledges that the implementation of the IRB Specialization Program (IRB SP) and Mentoring Program (MP) by the College of Immigration and Citizenship Consultants (the College) are methods to improve the competency of Regulated immigration and citizenship consultants (RCICs/licensees).

The IRB Specialization Program is intended to protect the public and benefits RCICs, their clients, and those seeking immigration services. CAPIC has gathered concerns voiced by our members regarding the delivery of the two programs. The issues and recommendations outlined in this submission aim to facilitate communication between our members and the College and improve the delivery of the programs.

Background

The common concerns raised by CAPIC members reside in two areas (i) communications and (ii) program delivery quality.

1. Lack of/delay in communications

CAPIC understands the limited capacity of the College's operations during the pandemic and post-pandemic phase, and the workload of the College in the transition period. It is acknowledged that the medium of email is and will continue to be the default communication channel between licensees and the College. Automated acknowledgement of receipt of emails is a practice that has been put in place by the College long before. Furthermore, the College has established standards for some email handling, e.g., the time limit for returning email inquiries from learners for instructors of the IRB SP.

The concerns received from CAPIC members are regarding circumstances when (i) seeking assistance or clarifications and (ii) unfair treatment when expressing concerns. Herein is our summary of such cases:

- Some contacting CICC experienced unanswered phone messages, unreturned emails, and long delays in replies when urgent assistance was

required for emergency issues. Examples of such cases include technical issues before the IRB SP exam when no technicians were available to assist with test system malfunctions.

- Boilerplate responses in response to questions about the IRB SP program. Some questions were more specific and required a clear reply.
- Some mentees at the Mentoring Program Pilot expressed their apprehensions over the way their expression of concerns was dealt with. Some noted that unfavourable comments and feedback postings about the program on MentorCity were deleted without any response to the issues raised in the comments.

2. Concerns over the delivery quality of the programs

The following is a summary of comments from CAPIC members who were learners at the IRB SP. Please note these were gathered to provide feedback to enhance improvements.

(1) The program does not incorporate the components of administrative law, which is essential to RCIC-IRBs.

(2) The program materials contain errors. Examples (2022-001 Version) are as follows:

- Incomplete citations: See the first case listed in CSID101: Optional Reading: Oremade v. Canada (Minister of Citizenship and Immigration). It only contains the first part of a citation, style of cause.
- Incorrect citations: See the fourth case listed in CSID101: Optional Reading: Poshteh v. Canada (Minister of Citizenship and Immigration), 2005 FCA 8. It is 85 instead of 8. See also the seventh case listed in CSIA101 Optional Reading: Singh v. Canada (Citizenship and Immigration), 203 FC 1075 (CanLII). It is 2013 instead of 203.
- Incorrect departmental names: See the name of the Canada Border Services Agency in CSID-101 Immigration Division Case File: It is misstated as Canadian Border Services Agent.
- Inaccurate definitions: See the Appeal and Counsel definitions on pp.2 and 3 of the Specialization Program – Education Resources Glossary of Terms, respectively. The IAD is not included in the Appeal definition. Counsel is defined only for the refugee claim process.
- Incorrect definitions: See the IRPR and Standard of Correctness definitions on pp.6 and 12, respectively, of the Specialization Program – Education Resources Glossary of Terms. The term IRPR explains the examination but not the Regulation. The Standard of Correctness explains how RAD applies to this standard, but not the standard.

(3) The delivery method could be more interactive and engaging: The program contains five live tutorials. Except for the CSIR101, each consists of a brief introduction and a simulation session. Other times during the program, learners are either required to work in groups to conduct a mock hearing or go through the course materials on their own. Members suggested including more in-class instructions and hands-on training, e.g., moot court.

As for the Mentoring Program, the following feedback was collected from the participants of the mentoring pilot program:

- The instructions for the first Zoom meeting on November 24, 2022, were confusing.
- A clear and comprehensive orientation about MentorCity and the mentoring process could help clear the confusion.
- The delivery method of the program is a concern as it lacks real practice and is delivered in a virtual classroom setting. It is similar to a course, whereas “live practicum” could mirror an actual practice.
- Reduced years of experience to be a mentor: Many indicated concern that three years of practical experience might not be enough to be a competent mentor.
- Lack of adequate notice regarding notice of program implementation.

Recommendations

CAPIC understands the College’s role as a public-interest body, and its mandate is the protection of public interest. The noted concerns, including the lack of communication between the College and licensees and the quality of program delivery, are valid. Clear and timely communication is necessary in order to serve the purpose of the two programs. And in turn, it will help the College to fulfil its mandate.

1. Recommendations for improving communications:

- Set up communication strategies to facilitate clear and efficient communications between the College and licensees to improve transparency.
- Set up and publicize the communication standards to facilitate communications between the College and licensees.
- Hold regular information sessions for licensees to provide information and answer questions about the role and the policies of the College regarding the programs.
- Ensure various communication channels are more accessible to the licensees, e.g., setting up a helpline for licensees.

- Regularly seek feedback and comments for communication improvement.

2. Recommendations for improving the delivery quality of the IRB SP and the Mentoring Program

- Conduct a thorough review of the IRB SP course materials and correct the errors and update inaccurate and incomplete information.
- Recruit instructors who are experienced in IRB proceedings.
- Seek feedback from the members who were and are learners/mentees of the programs to incorporate more advocacy elements, e.g., administrative law, into the IRB SP program and hands-on opportunities for the mentoring program participants.
- Develop and hold information sessions for the programs to clarify the confusion and concerns.
- Develop a mentor recruitment strategy to attract experienced RCICs to join the Mentoring Program as mentors, including more incentives to mentors beyond CPD hours.
- Set up a dedicated email address and staffed phone number for the two programs to address participants' emergency requests.

Conclusion

CAPIC brings forth the noted issues so that they may be addressed properly, efficiently, and effectively so that all parties involved may benefit. The IRB SP and the Mentoring Program are well-intentioned new attempts to enhance the ethical and competent practice of RCICs. It is recognized that both programs are unique, with one being a pilot, and that further improvements and growth will take time. With some issues now identified and recommendations presented, CAPIC looks forward to ongoing improvements.

CAPIC is always ready to be in aid of any action that will enhance members' ethical and competent practice and is willing to work with the College to be part of the solution to issues.

About CAPIC

The Canadian Association of Professional Immigration Consultants (CAPIC) is the professional organization representing the interests of over 4400 Canadian immigration and citizenship consultants. It serves its members on the four guiding principles: Education, Information, Lobbying, and Recognition.

CAPIC is the sole association recognized by the Government of Canada as the voice of Canadian immigration and citizenship consultants. We are a major immigration stakeholder and consult with federal and provincial governments on legislation, policy, and program improvements and changes.

We are committed to promoting the ethics and competence of our members and protecting the integrity of the RCIC profession and the Canadian immigration system.

Our Mission

CAPIC leads, connects, protects, and develops the profession, serving the best interests of its members.

Our Vision

By 2024, CAPIC will:

- Represent a large majority of Citizenship and Immigration Consultants.
- Achieve optimum performance with sound governance principles centered on digital leadership.
- Lead as the point of reference in virtual and in-person professional development.
- Set the gold standard in immigration education.
- Remain the omnipresent SOLE voice of consultants in the Canadian immigration Domain.

Contact Us:

www.capic.ca

Stakeholders@capic.ca