

## **2020-10-21 Additional Questions and Comments Regarding Changes to the AINP**

1. The AB Express Entry application process noted that:

"You must use the email address you will be using to correspond with the AINP. If you are selected to apply, you will need to have a MyAlberta Digital ID (MADI) account using the same email."

Currently, all our clients' EE profiles are on our Authorized Paid Representative (APR) Portal. We use the same email address for all of them. As we transition to the AINP Online Portal, would you accept APR's email correspondences to inform you should our clients receive the NOIs?

As we advance, we will instruct our clients to create their individual MyCIC account and basic MADI account using their respective email addresses.

2. Is there a possibility that we, APRs, could link our client's basic MADI account to the APR's verified MADI account?
3. For AOS applications, it looks like the MADI system provides the functionality for APRs to create multiple clients' applications using the verified MADI account. Is there a possibility that AINP will allow APRs to do this for our clients, instead of limiting the MADI account solely for the candidates? This process would facilitate the efficient and faster completion of our clients' applications (for all parties involved - client, APR, and AINP).
4. As the expectation from the Government of Alberta is that no one except the candidate can use the MADI account, what should applicants without sufficient computer literacy do to create an account and complete the online forms?
5. As the application and payment processing will be online, will the Government of Alberta reduce processing timelines and impose processing deadlines, as is common in other provinces?
6. The AB form has a different declaration to sign for lawyers and consultants. Consultants are effectively treated as lesser representatives on their AINP declaration forms. The difference in the declarations forms is explained in the attached documents. Please see "AINP Attachment 1" and "AINP Attachment 2".
7. The AINP website explains that: "The AINP portal is only for candidates. You are responsible for your AINP online portal account. Portal access is not available for third party representatives and family members."

We are deeply concerned about this advice. How are we (authorized immigration consultants) able to properly advise our clients on legal questions for their AINP

applications? Some of our clients are working in industries such as oil, gas, and construction in small hamlets and isolated areas for extended periods on work shifts, and there is often no reliable internet access. The platform should have a feature like the ICCRC Representative Portal.

We are federally and publicly recognized as immigration consultants in Canada. If we cannot help for our clients with their online AINP applications, it will be contrary to federal law and our duty to help clients to the highest standard possible. If the AINP office does not revise the provision, it will be deeply problematic for our clients and our ability to meet our requirements under the IRPA.

8. Why is AINP refusing applications from people who are residing in different provinces, while applications from outside Canada are being approved? It is illogical to assume that the intention to reside in Alberta is stronger from a person who is outside Canada compared to a person who is from another province.
9. Re: AINP - Use of Representative Form: Declaration of Representative
  - Item # 12 states: "I will relay any correspondence received from the AINP about the candidate's file directly to the candidate without modification or undue delay, and I will provide the candidate with complete and accurate information regarding the AINP and immigration matters."

Comment:

- The MADi portal is owned and maintained by the applicant. Each MADi account has the applicant's email address. Therefore, it is the client's responsibility to inform us (authorized third party representative) of any correspondence received from AINP to guide them accordingly.
- I created an Authorization Letter related to the AINP Online Portal to facilitate the application's efficient processing. Please let us know if this is acceptable for AINP. Please see attached: "5. Authorization and Certification - AINP Online Portal".