



Canadian Association of
Professional Immigration Consultants

L'Association Canadienne des
Conseillers Professionnels en Immigration

CAPIC's Submission Concerning Reforms to Express Entry's Federal High Skilled Programs and Comprehensive Ranking System

May 14, 2026

Table of Contents

Introduction.....	3
Analysis and Recommendations.....	3
Recommendations	9
Conclusion	9
About CAPIC	10
Contact us.....	11

CAPIC's Submission Concerning Reforms to Express Entry's Federal High Skilled Programs and Comprehensive Ranking System

Introduction

This submission provides feedback on the Consultations on Reforms to the Express Entry's Federal High Skilled Programs and the Comprehensive Ranking System (CRS).¹ It is based on professional observations arising from the current Express Entry (EE) framework and the operational issues encountered in practice. It responds to the reform direction set out in the consultation materials.

Analysis and Recommendations

1. Federal High Skilled Programs

(1) Merging the Existing Three Federal Programs

The current EE framework operates through three functional layers:

- a. Program eligibility
- b. CRS score
- c. Category-based selection eligibility

Under the proposed direction, these layers will continue to exist. The CRS and category-based selection will carry a greater share of policy intent. This approach reflects how EE already operates in practice. Program eligibility has not been the primary determinant of outcomes since the EE launch in 2015.² Selection outcomes are driven largely by CRS ranking and, increasingly, by category-based selection.

As a result, the move toward a unified program with streamlined requirements appears to be a structural simplification rather than a substantive policy shift.

(2) Effectiveness and Opportunities

This approach is likely to improve both client experience and operational

¹ IRCC, "Consultations on Reforms to Express Entry's Federal High Skilled Programs and Comprehensive Ranking System," accessed May 13, [online](#).

² IRCC, "Offering 'Express Entry' to Qualified Economic Immigrants," announced April 8, 2014, modified December 14, 2016, [online](#).

efficiency, while creating a more flexible framework overall.

From a client perspective, a single set of eligibility criteria would make the system easier to understand, reduce confusion arising from program overlap, and improve transparency. From an operational perspective, streamlined criteria would simplify assessment, reduce duplication, and support greater consistency in decision-making.

More broadly, this direction allows policy objectives to be implemented more directly through CRS ranking and category-based selection, rather than through multiple overlapping program structures. The result is a system with clearer entry requirements and a more coherent relationship between eligibility, ranking, and targeted selection.

(3) Work Experience Requirement

The proposed approach to work experience is generally appropriate. However, there is an important consideration regarding how different types of Canadian work experience are treated.

Certain types of experience do not qualify as Canadian work experience.³ However, under current programs, some can support eligibility, e.g., work experience obtained as a full-time student in Canada may be counted for the Federal Skilled Worker (FSW) program.⁴ Examples also include self-employment in Canada in certain healthcare occupations.⁵

In a unified program, it will be important to continue recognizing these forms of experience for eligibility purposes. Otherwise, there is a risk that these candidates may be unintentionally excluded.

(4) Education and Language Thresholds

The proposed baseline requirements for education and language appear reasonable in the context of a simplified system. These thresholds appropriately function as minimum entry criteria rather than selection tools, which are consistent with the broader shift toward CRS-driven selection.

³ *Supra*, Footnote 1, “Defining Canadian work experience.”

⁴ IRCC, “Can I count student work experience toward the Express Entry work requirement?” modified April 17, 2026, [online](#).

⁵ IRCC, “Temporary public policy to facilitate the issuance of permanent resident visas for physicians providing publicly funded medical services in Canada,” modified May 2, 2023, [online](#).

(5) Other Selection Factors

The removal of duplicative program-level selection factors is logical and consistent with the overall restructuring. If eligibility becomes a thinner entry filter and the CRS is carrying more of the selection function, then maintaining additional program-

specific selection mechanisms become less necessary.

This is particularly relevant in the case of the FSW selection grid, as many of those factors are already reflected within the CRS.

CAPIC supports the removal of the certificate of qualification and job-offer requirements under the current Federal Skilled Trades Program (FSTP). These requirements have historically functioned as structural barriers that do not reliably predict labour market success and, in some cases, have prevented otherwise qualified tradespeople from entering the pool. Their removal, combined with the proposed introduction of points for Red Seal designation and apprenticeship experience, shifts recognition of trade qualification to verifiable, outcome-based indicators, which improves both fairness and program integrity.

2. Comprehensive Ranking System

(1) Retention of Core Factors

CAPIC supports the proposed retention of existing CRS points for education, Canadian work experience, and official language skills. These factors remain well-established and evidence-based predictors of economic integration, and their continued recognition provides important stability within an otherwise evolving framework. The comments that follow address the specific elements of the CRS that are under active review.

(2) Age Factor

CAPIC suggests using the current FSW age grid as a reference for allocating CRS points to age.⁶ The existing CRS strongly favours candidates under 30. Data indicate that 30% of 18-to 34-year-olds are willing to move to another country in the near future.⁷ Given ongoing concerns about permanent resident retention, it may be appropriate to assign greater weight to a slightly older cohort.

⁶ See [s. 81](#) of *Immigration and Refugee Protection Regulations*, SOR/2002-227 (IRPR).

⁷ Institute for Canadian Citizenship, "The Leaky Bucket: A Study of Immigrant Retention Trends in Canada," released October 31, 2023, p.5, [online](#).

(3) High-Wage Occupations

Rewarding candidates based on the typical earning level of their occupation is a substantial change in policy direction.

Introducing occupation-based wage data adds an important dimension that is currently missing in the CRS. At present, the system primarily rewards the quantity of experience, without adequately distinguishing the labour market value of that experience. Incorporating earning potential helps align selection more closely with actual economic outcomes.

At the same time, this factor should be applied with caution. Occupation-based earnings are a strong signal, but they may not always capture long-term potential. Many candidates enter the labour market in transitional roles and progress into higher-wage occupations over time. This is particularly relevant for candidates in regulated professions and for individuals building Canadian experience after completing their studies. If weighted too heavily, this factor may disproportionately favour candidates who are already established in high-wage roles, while undervaluing those who demonstrate strong long-term potential.

CAPIC is cautious about the proposed reintroduction of valid job offers from a Canadian employer in a high-wage job. Removing points for job offers has effectively curbed the black market of the labour market impact assessment (LMIA). Reviving CRS points for job offers may bring unintended consequences, undermining the integrity of the system, given that LMIA fraud is the most common instrument falsely presented to foreign nationals as a key to obtaining Canadian permanent residence.⁸

(4) Study Points

The proposal to restrict education-based CRS points to graduate-level studies completed in Canada warrants careful reconsideration. While graduate study is a meaningful indicator, this change would also remove recognition of Canadian bachelor's degrees and of one- to two-year post-secondary programs, both of which play substantial integration roles.

The available evidence does not support a clear conclusion that sub-graduate Canadian credentials lack economic value. A Statistics Canada study suggests that Canadian credentials, which refer to at least one year of Canadian study

⁸ CAPIC, "CAPIC's Recommendations for the Temporary Foreign Worker Program Reform," October 2, 2024, p.8, [online](#).

experience, translate into stronger economic outcomes in the longer term.⁹ In practice, one- to two-year programs often serve as transition pathways for candidates who already hold foreign degrees, with tacit knowledge that facilitates labour market integration through specialization, local familiarity, and employer recognition. Canadian bachelor's degrees, likewise, remain a strong signal of language, cultural, and labour-market integration.

(5) Family-Related Factors

While family-related factors may be weaker predictors of earnings, focusing exclusively on earnings risks adopting an overly narrow definition of successful integration.

Available research and professional practice suggest that social networks, including family support, can play a meaningful role in labour market outcomes. Family support can contribute to housing stability, childcare support, system navigation, and access to employment networks. These supports can reduce early instability and accelerate labour market integration. In addition, relocating a family is more difficult than relocating a single individual. With the retention rate of permanent residents becoming an issue¹⁰ and the sharp drop in the number of permanent residents applying for citizenship,¹¹ assessing a family as a whole could be a contributing factor in the long term.

Rather than removing these factors entirely, a more balanced approach would be to retain a low-weight factor that recognizes broader family presence in Canada. In addition, relatives in the adaptability factor in the current FSW point grid prescribed in s. 83(5) of IRPR may be considered as a replacement for the brother and sister factor in the current CRS points.

(6) Canadian Licensure

Recognizing Canadian licensure in regulated occupations is a well-targeted and practical measure. Licensure represents a clear and verifiable indicator of labour market readiness. It is also strong from an integrity perspective, as it relies on assessments conducted by established regulatory bodies. This approach aligns with both labour market needs and system integrity objectives.

⁹ Eden Crossman, Youjin Choi, Yuqian Lu and Feng Hou, "International students as a source of labour supply: A summary of recent trends," Statistics Canada, modified March 23, 2022.

¹⁰ Institute for Canadian Citizenship, "The Leaky Bucket 2025: Retention Trends in Highly Skilled Immigrants and In-Demand Occupations," released November 18, 2025, [online](#).

¹¹ Feng Hou and Garnett Picot, "The decline in the citizenship rate among recent immigrants to Canada: Update to 2021," Statistics Canada, released February 28, 2024, [online](#).

(7) French Language Skills

Category-based selection is an effective tool for targeting French-speaking candidates according to the available data. French language proficiency draws issued 48,500 invitations to apply (ITAs) in 11 rounds over the past 12 months, which is by far the most dominant category in Express Entry. French-language proficiency candidates received the highest share of invitations compared to any other draws combined: 48,500.¹² Therefore, CAPIC agrees that additional points for French language proficiency can be removed.

(8) Skills Transferability

Because the current Certificate of Qualification applies only to the FSTP and Canadian licensure is intended to be for CRS points, CAPIC suggests replacing this with Canadian Licensure and awarding 25 points to Red Seal candidates with CLB 7 or above in all four components of either official language and 50 points to regulated candidates with CLB 9 or above.

(9) Canadian Work Experience and Full-Time Study

Greater clarity is needed regarding how Canadian work experience is assessed in relation to the “engaged in full-time study” exclusion.

IRPR does not define this term. The IRCC Glossary shows that full-time study status is determined by the students’ educational institution.¹³

Without a clear definition of full-time study, the following scenario may be open to inconsistent interpretations:

- Whether work experience obtained in Canada during remote full-time study at a foreign institution counts as Canadian work experience: s. 87.1(3)(a) of IRPR appears to indicate that the exclusion applies to this scenario. However, in this scenario, candidates do not have student status in Canada, which raises the question: could they be considered **engaged in full-time study in the context of Canadian immigration**? If such work experience counts for Canadian work experience, it would place students studying at a Canadian designated learning institution (DLI) at a disadvantage.

In addition, it would be difficult to justify excluding a full-time student in Canada

¹² IRCC, “Ministerial instructions respecting invitations to apply for permanent residence under the Express Entry system,” 1-3, modified April 27, 2026, [online](#).

¹³ IRCC, “Glossary,” modified June 30, 2025, [online](#).

who holds a work permit unrelated to their studies, even though awarding CRS points to this kind of candidate is not recommended based on the feedback from some DLIs.¹⁴

In short, full-time students in Canada should not be disadvantaged compared with foreign nationals in Canada who are studying remotely at foreign institutions, and full-time students with worker status should be considered under a balanced approach.

Recommendations

Based on the analysis above, CAPIC recommends the following:

1. Award maximum points to the age of 35 and up to the age of 46 inclusive.¹⁵
2. Continue recognizing work experience in Canada that is excluded from Canadian work experience for eligibility purposes.
3. Award CRS points to high-wage occupations only after it is confirmed by a thorough study that this approach contributes to the long-term economic establishment of favoured candidates.
4. Leave CRS points for job offer out of the reform to avoid misuse or abuse of LMIA.
5. Reduce additional points for one-to two-year Canadian education.
6. Retain spousal attributes but may consider reducing its weight.
7. Consider awarding additional CRS points to the relatives prescribed in s. 83(5) of the IRPR in place of the current factor of sibling in Canada.
8. Remove additional points for French proficiency.
9. Replace Certificate of Qualification with Red Seal and Canadian Licensure for the Skills Transferability factor CRS points.
10. Define “full-time study” for clarity.

Conclusion

CAPIC supports the overall direction of simplifying the Federal High Skilled programs and refining the CRS to better align selection with economic outcomes.

The movement toward a more standardized entry framework, combined with greater reliance on CRS ranking and category-based selection, reflects how EE

¹⁴ The Government of Canada, “Canada Gazette, Part I, Volume 158, Number 26: Regulations Amending the Immigration and Refugee Protection Regulations (Designated Learning Institutions),” Regulatory development, Consultation, posted June 29, 2024, [online](#).

¹⁵ See [s. 81](#) of IRPR.

already functions in practice and offers a meaningful opportunity to reduce duplication, improve transparency, and enhance administrative efficiency.

At the same time, the success of these reforms will depend on maintaining balance. A more targeted and evidence-based system should continue to recognize that long-term economic success is shaped not only by immediate earnings indicators, but also by broader integration factors such as Canadian study, family support, the proper recognition of legitimate Canadian work experience, and consistency between policy guidance and system design.

In CAPIC's view, the strongest reform outcome will be one that improves coherence without narrowing the system so far that it overlooks legitimate pathways to long-term economic establishment. Clearer rules, better alignment between operational guidance and digital system logic, and more balanced weighting of economic indicators would help support a system that is both more effective and fair.

About CAPIC

The Canadian Association of Professional Immigration Consultants (CAPIC) is a not-for-profit professional organization representing the interests of Canadian Immigration Consultants.

The organization advocates for competency, ethical conduct, and consumer protection in the immigration consulting industry. CAPIC's mission is to lead, connect, protect, and develop the profession, serving the best interests of its 4,000 members. It is the only association recognized by the Government of Canada as the voice of Canadian immigration and citizenship consultants. CAPIC is a major stakeholder consulting with federal and provincial governments and their respective departments on legislation, policy, and program improvements and changes.

CAPIC celebrated its 20th anniversary in 2025. Founded in 2005 through the merger of the Association of Immigration Counsel of Canada (AICC) and the Organization of Professional Immigration Consultants (OPIC), CAPIC has spent two decades as the national professional association for immigration consultants, advocating for the profession before Parliament, IRCC, the IRB, and provincial governments. CAPIC's sustained engagement with the Standing Committee on Citizenship and Immigration (CIMM) has produced tangible results, including the enactment of the *College of Immigration and Citizenship Consultants Act*, SC 2019, c. 29, s. 292, a federal statute that CAPIC first recommended to CIMM in 2017.



All CAPIC submissions are publicly available on the CAPIC [Advocacy](#) web page to facilitate communication between CAPIC and our 4,000-strong membership and the general public.

Contact us

www.capic.ca

Hui Zhang: stakeholders@capic.ca