Dory Jade, C. Dir. Chief Executive Officer CAPIC-ACCPI

RE: Your letter of August 16, 2021 on Representative Access to Online Portals

Dear Dory,

I would like to thank you for your letter and valued feedback regarding the digital solutions being released by IRCC.

IRCC remains committed to continuing our outreach with immigration practitioner groups such as CAPIC to provide you with the latest information on any new policies, tools and procedures as well as to answer questions you may have about our programs. We have greatly appreciated the opportunity to hear your input through regular monthly meetings between immigration practitioners and IRCC's Operations Sector; pain point discussions; and ongoing consultations on various tools and programs which have allowed us to strengthen and improve the overall client experience.

In your August 16th letter, you note that representatives have largely been excluded from a number of digital tools including the new Permanent Resident Digital Intake tool, the online platform for grant of citizenship applications and the Temporary Residence to Permanent Residence Pathway online portal (referencing your April letter), which prevents representatives from being able to adequately assist their clients. We acknowledge the seriousness and legitimacy of the CAPIC's concerns regarding the limitations of these tools and the potential consequences for clients. IRCC initially implemented these digital tools (minimum viable products) in order to enable clients to continue submitting applications at the height of the COVID-19 pandemic when IRCC staff were unable to be physically present in our processing offices. Due to these unprecedented circumstances, we were unable to develop a multi-credential solution in tandem - the integrity of the application process and security of applicants' personal information was the priority.

We recognize the critical role that representatives play in supporting applicants throughout the preparation, submission and processing of their clients' applications and that is why IRCC is actively working towards implementing processes and tools that will allow representatives to submit applications on behalf of clients.

Since IRCC's August 10th announcement of a new Permanent Residence Online Application Portal (PR Online Application Portal) for authorized representatives and as per our ongoing commitment to keep you apprised of new developments, IRCC invited CAPIC, the CBA and AQAADI to a preliminary demonstration of the representatives' portal. The August 19th demonstration provided an end to end walkthrough of the representative portal's functionality, including account creation, initiating, managing and submitting an application on behalf of your clients, and also the interaction with the client application portal.



The presentation was well received by your members, who shared questions, comments and positive feedback for the release. In fact, I am very excited to announce that the PR Digital Intake representative portal is now live as of August 31st. The representative portal was soft launched at 20% accessibility, and the aim is to remove the randomization and enable full implementation later in September. We understand there have been a few technical issues due to the deployment on August 31, 2021. We would encourage any feedback on the new representative portal that you or your members may have.

To date, permanent resident applicants are able to apply to the following PR streams through the online applications portal. The same will apply to the representative portal once it launches in September.

- Provincial Nominee Program
- Rural and Northern Immigration Pilot
- Agri-Food, Atlantic Immigration Pilot
- Quebec-Selected Investor Program
- Quebec Self-Employed Persons Program
- Humanitarian and Compassionate Considerations
- Self-Employed Persons
- Start-Up Business
- Protected Persons
- Quebec Skilled Workers Program
- Permit holder class
- Overseas Spouse and Partner
- In-Canada Spouse and Partner
- Adoptions
- Dependent Child
- Other eligible relatives
- Home Support Worker Pilot

In an effort to continue modernizing our Citizenship Program, on May 10, 2021, IRCC launched the new Citizenship Application Status Tracker, which allows clients who have applied for citizenship (adult or minor) or their representatives to consult up-to-date information on the status of their request at all times.

Applicants or their representatives can:

- view the timeline for processing their request, which includes, among other things, significant activities that have been carried out with respect to their request;
- details: clearly see the requirements that must be met before a decision is made;
- view next steps or any other missing information needed.

The Citizenship Application Status Tracker registration process invites clients who use the services of a representative to contact the representative to find out the status of their application.

In addition to the above, IRCC has also engaged in numerous consultations and usability testing with members of CAPIC and other immigration practitioners. A list of recent engagement can be found in annex to this letter.





IRCC appreciates the time and input that members of your organization have contributed towards these efforts. This feedback has helped us to develop digital tools with the representative user experience in mind. We hope it was helpful to your members as well.

Please note that representatives can continue to submit applications on behalf of their clients through the Authorized Paid Representative's (APR) Portal for the following application types: Express Entry (EE) and International Experience Canada (IEC) profiles; work, study and visitor permits; Electronic Travel Authorization (eTA) and Interim Federal Health Program (IFHP applications. Once an application is submitted it can also be linked to an APR Portal account which allows representatives to view the status of applications, view messages from IRCC, indicate a transfer from one Designated Learning Institution from another, pay online, and receive e-mail notifications once a change has occurred in their account.

Additionally, representatives continue to have the option to support and assist their clients in the submission of paper applications for all lines of business and programs.

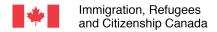
We recognize that there are limitations with our existing tools and that there have been some growing pains as we move our processes into the digital space. We hope that this added insight into the work we are doing shows that we are taking this issue seriously and are committed to working towards solutions. We also want to assure you that incorporating representative functionality into future digital tools remains a priority for IRCC going forward.

Thank you once again for your feedback, identifying CAPIC's six key areas of concern, and for raising these concerns with the Department.

Yours Sincerely,

André Baril Director General, Immigration Program Guidance





Annex: Recent Consultations Undertaken by IRCC with Immigration Representatives

Consultations	Details
PR Digital Intake	All 3 organizations were contacted on June 23 about usability testing
Representative	for the updated portal. This testing was led by our Client Experience
Portal	Branch and continued through August.
"APR Portal 2.0"	In order to help design a new Portal, discussions about issues with the current Authorized Paid Representatives (APR) Portal, led by IRCC's Transformation Branch took place with your organization in May-June. Additional consultations also took place in August.
Consultations on TR Process	The "Temporary Resident Journey Lab" undertook consultations with representatives and your members the week of July 5. Further consultations have been planned over the summer. These consultations may be done with representatives who expressed interest in the PR Digital Intake Portal.
Pain Points Discussions	 On July 15th, 2021 With each of the 3 organizations (CAPIC, CBA and AQQADI) we discussed issues with: IRCC Webform, Grace periods for IRCC forms Digital submission of the IMM5476 through the Portal IRCC agreed to remove the requirement that representatives applying for an APR Portal account provide an attestation from another representative We shared with practitioners that a Global Case Management System Disaster Recovery Project is currently being implemented that should reduce the amount of outages.

