

John Murray, CEO The College of Immigration and Citizenship Consultants (CICC) by email

May 6, 2022

Re: Specialization Program

Dear John,

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC), I would like to bring to your attention some of our members' concerns regarding the Specialization Program.

As you know, CAPIC is completely supportive of the College's mandate of protecting the public. Therefore, we are in favour of a peer practice concept which involves a specialization requirement, as per the College's Bylaw's Section 10.7, that every RCIC who practices before the IRB needs to hold the specialization.

However, the Specialization Program as offered by the College seems to be running short of cohorts to permit many current practitioners to be ready by July 1, 2022. We are concerned that the College has set a series of exams and result dates which appear to be falling short of that deadline.

We feel it will not be in the best interest of the public to lose representatives due to the College scheduling their exam schedules and results beyond July 1. The second exam's results are scheduled for release on July 27, and then the third exam's results aren't released until February 1, 2023.

Ultimately, we are concerned about the potential lack of access to justice and service that applicants before the Board will face if they are not able to utilize RCIC representation, with already established client-consultant relationships, as counsel and applicant prepare for upcoming hearings.

Many RCICs, in good faith, have taken the IRC specialization course or are in process, and yet there is little opportunity to take exams within the appropriate time, especially given that exam release dates are lengthy. As noted, changing retainers and passing clients to other consultants can be a lengthy process and often traumatizing for those who are vulnerable and who rely on the RCIC counsel that they have carefully selected.

CAPIC recommends the following:

- Open more exam slots with faster exam results released before July 1 and during July and August so the availability of RCIC counsel remains high to support immigration-seekers before the IRB.
- 2. Improve communication with RCICs and proactively advise them of any situations that may affect their practice.

In the long term, we recommend integrating the Specialization Program into the Immigration Program at Queens University and Université de Montreal to avoid similar situations in the future. We look forward to working with you on this matter.

Sincerely,

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