

NOC Submission on Behalf of CAPIC on Canadian Immigration and Citizenship Consultant

Please note that this document is supplementary to a duly completed NOC response form. This initiative is fully supported by the federal regulator, the Immigration Consultants of Canada Regulatory Council.

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About CAPIC

The Canadian Association of Professional Immigration Consultants (CAPIC) is the professional organization founded for Regulated Canadian Immigration Consultants (RCICs) on four pillars: Education, Information, Lobbying, and Recognition.

CAPIC's mission is to lead, connect, protect, and develop the profession, serving the best interests of its 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 that consults with federal and provincial governments and their respective departments (e.g. IRCC, CBSA, IRB, ESDC) on legislative, policy, and program improvements and changes. Hence, we are making this submission for NOC with the same objective.

We respectfully submit and request that there should be an independent NOC code identifying CANADIAN IMMIGRATION AND CITIZENSHIP CONSULTANT as a regulated profession as the case in 2004.

In fact, in 2003 a DACUM was performed in conjunction with Seneca College and under supervision of a certified DACUM. Please see the attached DACUM chart. This, however, has been updated in our proposal to meet today's main job duties, though there were only slight changes.

Preamble

In Canada, the federal government groups and organizes occupations based on a National Occupational Classification (NOC) system. Data for the NOC group can apply across multiple occupations.

Brief History of Canadian Immigration and Citizenship Consulting

Through the *Immigration and Refugee Protection Act*, in 2004 the Canadian government brought into existence a federal regulatory body for the regulation of what are known today as "Canadian Immigration and Citizenship Consultants" — the <u>Immigration Consultants of Canada Regulatory Council</u> (ICCRC). On March 19, 2019, the federal government brought forward legislation for the creation of an independent federal statute called the <u>College of Immigration and Citizenship Consultants</u> to regulate this profession, in its budget implementation Bill C-97.

According to the Honourable Ahmed Hussen, Minister of Immigration, Refugees and Citizenship, "These changes will protect both Canadians and prospective newcomers as well as the many good-standing consultants that are providing immigration and citizenship services ethically and professionally."

Parliament passed Bill C-97 on June 6, 2019, and it received royal assent on June 21, 2019.

Our submission on proposed changes and the rationale behind them will be discussed as follows:

- main work duties
- certification or licensing requirements (if applicable)
- educational background, tools, and technology used, as well as experience required for entry into the occupation
- current job titles used in the Canadian labour market
- · reports, studies, hyperlinks, experts, and sources of information used

Profile Description

A Canadian immigration and citizenship consultant is a professional who is a Canadian citizen or permanent resident. An immigration and citizenship consultant assesses, advises, and represents individuals, groups, and entities in the immigration and citizenship process by strategizing, preparing, and presenting oral/written submissions and supporting documents and by advocating on behalf of clients before government agencies such as IRCC, the CBSA, IRB, ESDC, and provincial and territorial immigration departments. They are also called:

• Regulated Canadian Immigration Consultant (RCIC). During transition to the new college, this acronym will likely change.

Minimum Education

This is evolving due to the new Act. A Canadian immigration and citizenship consultant must be a member in good standing of a federal regulatory body. Currently this is the ICCRC, which soon will transition to a college.

Immigration practitioner providers such as Humber College require an undergraduate degree or two-year post-secondary diploma to be admitted into the Canadian immigration and citizenship consultant program; for educational standards, please refer to the links provided at the end of this document. It involves successful completion of an ICCRC-approved Immigration Practitioner certificate. Queen's University Faculty of Law will be the sole accredited English language provider, and Université de Sherbrooke the sole French language provider, of a new Graduate Diploma in Immigration and Citizenship Law to be launched in 2021.

Regulated: Under Canada's *Immigration and Refugee Protection Act* (paragraph 91(2)(c)), a Canadian immigration and citizenship consultant, in Canada or abroad, who provides Canadian immigration services for a fee must be a member of the Immigration Consultants of Canada Regulatory Council (ICCRC) and accredited as a Regulated Canadian Immigration Consultant (RCIC). Details on mandatory requirements and the process for registration are available on the ICCRC <u>website</u>.

Certification

A Canadian immigration and citizenship consultant must be a member in good standing of a federal regulatory body. Some provinces require the posting of a registration and/or bond. This is restricted to RCICs (members of the federal regulatory body, the ICCRC). To represent immigration applications to the provincial government of Quebec, an additional licence is required from the Ministère de l'Immigration, de la diversité et de l'inclusion (MIDI).

Proposed Changes and Rationale

We propose that this occupation be properly <u>recognized</u>, <u>categorized</u>, and <u>titled</u> as "<u>Canadian Immigration and Citizenship Consultant</u>" in the NOC as is stipulated under the <u>College of Immigration and Citizenship Consultants Act</u> recently passed by Parliament. Prior to this Act, it was recognized and under section 91(2)(c)) of IRPA.

It is a specialized occupation like patent agents and requires a postsecondary education/undergraduate degree and training, or a combination of equivalent experience in the occupation and education. We respectfully recommend that it be identified with its own specific NOC, as has been done with patent agents.

The NOC system is updated every five years to reflect changes in the labour market. In the past three updates, however, this profession has not been included. Government forms and labour market data may group and refer to an occupation differently, depending on the system used. Here is how this occupation is assumed to have been classified over time without a lead statement and main duties tailored to the profession:

- 2006 NOC: Social Policy Researchers, Consultants and Program Officers (4164)
- 2006 NOC-S: Social Policy Researchers, Consultants and Program Officers (E034)
- 2011 NOC: Social policy researchers, consultants and program officers (4164)
- 2016 NOC: Social policy researchers, consultants and program officers (4164)

Canadian immigration and citizenship consultants are part of the larger 2016 National Occupational Classification 4164: Social policy researchers, consultants and program officers.

It includes occupations in education; immigration; law; social, community, and government services; social sciences; and public administration, including front-line public protection services, developing government policy, and administering government and other programs.

Skill Level

In the context of the NOC, Skill Level corresponds to the type and/or amount of training or education typically required to work in an occupation. The NOC consists of four Skill Levels identified A through D, with each level assigned one of two numerical codes

ranging from 0 to 7. To illustrate this concept, have a look at the chart below to see the relationship between the alphabetical indicator of each Skill Level and its accompanying numerical digits.

Skill Level is primarily based on the nature of education and training required to enter an occupation. This criterion also reflects the experience required and the complexity of the responsibilities involved in the work, compared with other occupations. In most cases, progression to Skill Level A, from B, is not usually possible without completion of additional formal education, whereas progression from Skill Level D to C is often achievable through on-the-job training and experience.

Each Skill Level is intended to reflect commonly accepted paths to employment in an occupation. Where there are several paths to employment, the Skill Level most commonly identified by employers is used, considering the context of the occupation and the trends in hiring requirements.

The second digit of the NOC code represents the Skill Level for all occupations, except for Management, which will be discussed below.

The four Skill Levels (A to D) used in the NOC are identified in the second digit of the NOC code.

Skill Level (alpha) A - Occupations usually require university education.	Skill Level (digit)	Nature of Education/ Training University degree at the bachelor's, master's or doctorate level.
B - Occupations usually require college or vocational education or apprenticeship training	2 or 3	 Two to three years of post-secondary education at a community college, institute of technology or CEGEP or Two to five years of apprenticeship training or Three to four years of secondary school and more than two years of on-the-job training, specialized training courses or specific work experience. Occupations with supervisory responsibilities and occupations with significant health and safety responsibilities, such as firefighters, police officers and registered nursing assistants are all assigned the Skill Level B.

Duties

- Represent clients at tribunals and before administrative bodies, including Canadian visa offices abroad
- Advise clients on elements of immigration and citizenship law
- Conduct research on immigration and citizenship legal precedents and gather evidence
- Conduct research on country conditions for evidentiary purposes
- Prepare immigration and citizenship applications
- Plead clients' cases before tribunals and boards

In Canada, the role of a Canadian immigration and citizenship consultants is to advise and assist immigrants in navigating the immigration and citizenship system. They ensure applicants comply with or meet the legal requirements of Canadian immigration and citizenship criteria.

In general, Canadian immigration and citizenship consultants oversee all aspects of the immigration and citizenship process. They:

- Represent clients who apply for visas and/or citizenship;
- Assist clients with application preparation and other documentation for obtaining visas and/or citizenship;
- Represent clients before IRB and CBSA proceedings;
- Communicate with clients in person and in writing;
- Ensure all applications and documents are completed and submitted on time;
- Communicate with visa offices (IRCC), ESDC, the CBSA, the IRB, and other government departments/officials on behalf clients;
- Ensure information provided by the client is accurate and up-to-date; and
- Prepare all fee quotes and any information required by clients, colleagues, or authorities.

Canadian immigration and citizenship consultants may be required to train human resources personnel to enhance the latter's understanding of immigration rules. Some Canadian immigration and citizenship consultants work for organizations that employ foreign workers. Therefore, knowledge of and experience with the Temporary Foreign Worker Program or other Canadian immigration programs (e.g. the Provincial Nominee Programs) may be required.

Tools and Technology

Canadian immigration and citizenship consultants must possess excellent computer and PowerPoint presentation skills and telephone and communication technology tools [office administration, project management, and research and evaluation tools and technologies] to access the Internet as a research tool and prepare materials using various software programs.

Required Strengths

- General learning ability to act on issues within their jurisdictions
- Social interest in locating and interviewing witnesses and applicants
- Methodical interest in compiling information to search and study records, documents, and information
- Directive interest in consulting with and advising clients and in representing clients at tribunals and before administrative bodies
- Exceptional written and oral communication skills
- Clerical perception to draft briefs, pleadings, and other documents

Skills and Abilities

Canadian immigration and citizenship consultants need:

Strong consultation, interpersonal, and stakeholder relationship skills to maintain productive working relationships with external stakeholders (clients and government) to meet mutual goals.

Attitudes/Characteristics

- Responsive
- Ethical
- Honest
- Confident
- Goal-Oriented
- Entrepreneurial
- Focused
- Patient
- Professional
 - Knowledge
 - Standards
 - Upgrading
 - > Appearance
 - Assertive

Compassion

- Attentive to detail
- Diplomatic
- Energetic
- Determined
- Culturally Sensitive
- Straightforward
- Trustworthy
- Flexible

- Resourceful
- Intuitive
- Persistent

Knowledge

- Immigration, Refugee, and Citizenship Acts/Regulations
- Operational Memoranda
- Criminal Code
- All Relevant Legislation
- Immigration and Citizenship Manuals
- Enforcement Policy and Manuals
- Immigration- and Citizenship-Related Policies, Procedures, and Practices

Skill

- Problem-Solving
- Critical Thinking
- Communication Skills
 - Written/Oral/Presentation/Non-Verbal
- Computer Literacy
 - Word Processing/Internet/Excel/Data
- Entrepreneurial
- Project Management
- Research
- Time Management
 - Ability to Prioritize/Delegate
- Life Skills
- Networking
- Crisis Management

Educational Requirements

Canadian immigration and citizenship Consultants must take an Immigration Practitioner Certificate program from institutes that are accredited by the regulatory body. Currently these programs consist of six modules and 500 hours of in-class instruction. Some providers require an additional 160 hours of practical experience.

In an announcement on May 1, 2019, the ICCRC stated that Queen's University Faculty of Law will be the sole accredited English language provider, and Université de Sherbrooke the sole French language provider, of a new Graduate Diploma in Immigration and Citizenship Law to be launched in 2021.

An undergraduate degree, diploma, or equivalent practical experience is an entry requirement. Prerequisites also include a level of language proficiency in English or French, Canadian citizenship or permanent residence in Canada, or status as a Registered Indian within the meaning of the *Indian Act*.

Upon completion of the program, graduates must pass an institutionally-designed exam to obtain an Immigration Practitioner Certificate (IPC). This, and sufficient language proficiency, ensures they are eligible to write the ICCRC Entry-to-Practice Exam (EPE), administered and invigilated through an independent service provider.

Upon meeting these requirements, the ICCRC grants them membership with the Council and the title of Regulated Canadian Immigration Consultant.

To maintain membership, Canadian immigration and citizenship consultants must attend mandatory Practice Management Education (PME) courses, obtain 16 Continuing Professional Development hours of practical education in the form of points, and meet the requirements of compliance audits annually. They are also required to comply with a strict code of professional ethics and carry errors and omissions insurance.

Career Handbook

4161.5/4164.6 Canadian Immigration & Citizenship Consultant or Canadian Immigration & Citizenship Policy Analyst

We propose a derivative of either of the above caption in the career handbook to clearly identify this specific occupation.

Canadian immigration and citizenship consultants conduct research of country conditions, analyze acts, policies, and regulations, and articulate the application of and/or compliance with immigration and citizenship law provisions by their clients.

Main Characteristics

- General learning ability to articulate and understand immigration and citizenship programs, legislation, and proposals based on demographic, social, and economic analyses
- Verbal ability to communicate research findings both orally and in writing
- Numerical ability to conduct statistical analyses
- Innovative interest in coordinating information submission to develop programs, legislation, and proposals based on analyses
- Direct and indirect interest in implementing and administering immigration and citizenship policy issues
- Social interest in consulting with government officials to write submissions on immigration and citizenship policy issues

Aptitude, or an individual's overall capacity to learn the skills needed to perform a given job's duties, is based on his or her specific aptitudes for acquiring information and transforming it into action.

Aptitudes, Interest, DPT, Physical Activities (PA), and environmental conditions are similar to other occupations in this group.



Working Conditions

Canadian immigration and citizenship consultants usually work in an office environment during standard weekday hours. However, some Canadian immigration and citizenship consultants may travel nationally and international, and overtime may occasionally be required.

Employment and Advancement

Canadian immigration and citizenship consultants are self-employed or employed by established consulting firms, law firms, or universities/educational institutions to oversee their international students and employee immigration matters. Those who are self-employed must market their services and maintain professional credibility. Canadian immigration and citizenship consultants employed by consulting firms may become team leaders and senior consultants. With experience in a consulting firm, many Canadian immigration and citizenship consultants set up their own firms. Even experienced practitioners who leave salaried positions to become consultants must often subcontract their services to established consultants before building their own client base.

Related Occupational Profiles

- Citizenship and Immigration Officer
- Foreign Service Officer
- Human Resources Professional

Other Sources of Information

https://www.parl.ca/DocumentViewer/en/42-1/bill/C-97/third-reading#ID0ECTGO

Canadian Association of Professional Immigration Consultants website: www.capic.ca

Immigration Consultants of Canada Regulatory Council website: www.iccrc-crcic.ca

http://noc.esdc.gc.ca/English/noc/QuickSearch.aspx?ver=16&val65=4164

http://noc.esdc.gc.ca/English/CH/QuickProfile.aspx?ver=16&ch=03&v=4164.1

https://business.humber.ca/programs/immigration-consultant.html

https://www.queensu.ca/gazette/stories/queen-s-law-launches-graduate-diplomaimmigration-and-citizenship-law

https://extendedlearning.ubc.ca/programs/immigration-laws-policies-procedures-certificate?gclid=CjwKCAjwmNzoBRB0EiwAr2V27SDCuMYkAl2CrHEFTYU_nottyuTqsZ_M7fRe-ACUU1j7JITixcq4zBoCVPwQAvD_BwE

https://www.ashtoncollege.ca/programs/immigration-consultant-diploma-imcd/?gclid=CjwKCAjwmNzoBRB0EiwAr2V27SfDtgRoZpw3rtd9x9Ym7aLrnH0lArc5J6hSHZKDS0RZFixqgFADVhoC2WQQAvD_BwE

https://bowvalleycollege.ca/programs-courses/careers-in-immigrant-advancement/immigration-practitioner

Alberta Learning Information Service (ALIS) website

Conclusion

With the recent parliamentary enactment of the *College of Immigration and Citizenship Consultants Act*, which will see the current regulatory regime under the CNCA transition into the College, CAPIC believes it is time for the NOC team and ESDC to create and identify "Canadian Immigration and Citizenship Consultant" as a regulated profession with an independent NOC code, and the resulting code in the career handbook. For further questions, please contact the writer.

Respectfully submitted,

Donald U. Igbokwe, B.A Hons. M.A, C.I.P, RCIC

Immediate Past President

The Canadian Association of Professional Immigration Consultants (CAPIC-ACCPI)



DACUM for Immigration Counsel/Consultant

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DACUM

The DACUM analysis was conducted in Toronto on February 20 and 21, 2003, by Marilyn Welsh of Egenuity Inc. The panel consisted of nine individuals who met the predetermined criteria of working professionals with a minimum of two years experience in the field.

Organizer: Gerd Damitz

Panel Participants:

Julia Brodyansky
Lucy Cardoso
Clement Ching
Dawn Moore
Russell Monsurate
Alan Nutbrown
Elda Paliga
Alain Sousa
Mark Varnam

Job Description:

An Immigration Counsel/Consultant* is a professional, based in Canada, who is a Canadian citizen or permanent resident and who assesses, advises, and represents individuals, groups, and entities in the immigration process by strategizing, preparing, and presenting oral/written submissions and supporting documents, and advocating on behalf of clients with government bodies.

* Despite exhaustive discussion, the group was unable to obtain consensus on the job title. Accordingly, they preferred to include both names and a summary of the discussion so that validators could add their voices to the debate before a final decision is made.

DUTY TASKS

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Prepare Case and Counsel Client	Create File	Obtain signed Authoriza- tion to Disclose	Prepare/ Adapt/ customize list of required documents and forms	Obtain required documents and/or forms	Develop case strategy	Check documents and forms for completion A-6	Repeat process until documen- tation is complete A-7	Revise strategy as necessary	Obtain required signatures A-9	Liaise with 3 rd parties /entities Indivi- duals	Consult relevant sources and references A-11	Prepare and file submission
Manage Case and Counsel Client	Monitor the prog- ress of the case	Document progress of case B-2	Follow-up with gov. bodies and comply with additional requests B-3	Identify problems and amend strategy accordingly B-4	Inform client at significant stages of process B-5	Prepare/ inform client for/of interview and hearings B-6	Respond to changes in law/ client situation and receive permission to proceed B-7	Liaise with 3 rd parties/ entities Individuals	Provide or arrange for orientation services B-9			
Assess Prospec- tive Clients for Eligibility	Pre- screen clients	Schedule client interview/ meeting C-2	Develop/ adapt/ customize question- naires C-3	Interview prospective clients C-4	Collect inform- ation from prospec- tive client C-5	Determine eligibility C-6	Inform client of eligibility C-7	Advise clients of immigration options C-8	Discuss terms and conditions with client C-9	Obtain approval of agree- ment from client C-10	Obtain instruct- ions from client	
Perform/ Manage Office Activities D	Establish/ monitor office proce- dures D-1	Manage human resources D-2	Respond to written/oral/ electronic commu- nication D-3	Manage files D-4	Apply project manage- ment tech- niques D-5	Perform/ manage accounting practices D-6	Record/ report financial data D-7	Review/ purchase/ maintain office equipment and supplies D-8				

Upgrade professional skills and knowledge continuously	Be a member of an immigration association	Maintain and upgrade reference material E-2	Attend educational workshops/ seminars/ courses E-3	Read news- letters/ journals/other publications	Network				
Market services	Prepare/ distribute print/audio-visual/ electronic media F-1	Out-source market activities	Prepare/ deliver presentations nationally/ internationally F-3	Collect and Present testimonials in a variety of formats	Write/ publish immigration articles	Perform pro-bono work	Promote business through social functions/ activities F-7		
Conduct research/ analysis/ verification G	Review case law G-1	Review relevant acts and regulations G-2	Review immigration manuals/ guidelines/ OMs	Analyze research findings	Request verification of findings from reliable sources G-5	Compile data	Study statistical data	Perform information searches G-8	Apply research to cases, etc.
Advocate for change in legislation policy/ procedures/ practices/ guidelines	Present papers/ Proposals/ recommendations to Parliamentary Committee of Canada (CIC) H-1	Participate in government committees and working groups	Present professional interests/ positions to politicians	Write articles/ press releases	Participate in media interviews				

Attitudes/Characteristics

Responsive; Ethical; Honest; Empathic; Confident; Goal-Oriented; Entrepreneurial; Focused; Patient; Open; Warm-Hearted; Professional (Knowledge, Standards, Upgrading, Appearance); Assertive; Compassionate; Attentive to Detail; Empathetic; Diplomatic; Energetic; Stamina; Culturally Sensitive; Straightforward; Trustworthy; Flexible; Resourceful; Intuitive; Persistent; Quick-Thinking; Positive-Thinking

Knowledge

Immigration Acts/Regulations; Operational Memoranda; Canadian Government/Culture; Criminal Code; All Relevant Legislation; Immigration Manuals; Procedures; Practices

Skills

Problem Solving; Critical Thinking; Communication Skills (Written/Oral/Presentation/Non-Verbal); Computer Literacy (Word Processing/Internet/Spread Sheet/Data); Entrepreneurial; Small Business Operation; Project Management; Research; Time Management (Ability to Prioritize/Delegate); Coping Mechanisms; Language *Optional*; Life Skills; Networking; Crisis Management

Comments on Education

Throughout the two days, the committee made comments and recommendations about education for this job. These have been collected and are presented here.

Establish minimum standards and a variety of flexible approaches to gaining required standards through a combination of:

- Education
- Experience
- Portfolio (use prior learning assessment techniques to assess current knowledge, skills, and attitudes)

Make education more flexible and more accessible

- On-line
- Modularized (core + options depending on degree of specialization)
- Allow for longer time span to complete required education for "grandfathered" cases
- Create a graduated licensing system with mentors (5 years)
 - Probationary Licence (up to 2 years)
 - ➤ Associate Licence (2 5 years
 - > Full Licence (after 5 years)

Develop a comprehensive, fair assessment process for those who wish to challenge the educational requirements. Immigration counsel/consultants should have input into the development of tests. The evaluation process should go beyond theory and test for application through such methods as case studies, portfolio interviews, client testimonials, etc.

Appendix

During the DACUM session, four titles were suggested for the job classification:

- Immigration Counsel
- Immigration Consultant
- Immigration Practitioner
- Immigration Specialist

Comments on title for job description:

IMMIGRATION COUNSEL

- Gets the profession out of the negative misperception "had by all" of IMMIGRATION CONSULTANT;
- Is in keeping with reference in the Immigration Act and Regs;
- CIC would be unlikely to object to such an occupation classification for the profession, since it is in the Act and Regs;
- The Bar Association would be unlikely to object to such an occupation classification for the profession, since it is in the Act and Regs;
- The public would assume that these professionals are different from "immigration consultants" and therefore attach to them a level of respect.

IMMIGRATION CONSULTANT

• Negative misperceptions from Bar Association, media, and public

IMMIGRATION PRACTITIONER

- Very few use this title, although it is in the Seneca and UBC program titles
- Medical connotations
- Layperson would not recognize/understand it

IMMIGRATION SPECIALIST

Medical connotations



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BY EMAIL: NC-CONSULT-GD@hrsdc-rhdcc.gc.ca

July 18, 2019

National Occupational Classification (NOC) consultation Government of Canada Career and Labour Market Information Division | Skills and Employment Branch Employment and Social Development Canada Gatineau, QC, Canada K1A 0J9

Dear Sirs/Mesdames:

Re: Proposed NOC Code: CANADIAN IMMIGRATION AND CITIZENSHIP CONSULTANT

The Immigration Consultants of Canada Regulatory Council (the Council) is the national self-regulatory organization for Canadian immigration and citizenship consultants and international student immigration advisors. Pursuant to s. 91(1) of the *Immigration and Refugee Protection Act* (Canada) and s. 21(1) of the *Citizenship Act* (Canada) all individuals who provide or offer to provide Canadian immigration or citizenship advice or services for compensation, must be members in good standing of the Council unless they are members in good standing of a Canadian provincial law society, or the Quebec Chamber of Notaries.

We are aware of, and endorse fully the recent application by the Canadian Association of Professional Immigration Consultants (CAPIC) proposing the creation of a new National Occupation Classification (NOC) for Canadian immigration and citizenship consultants, as set out in CAPIC's submission in support of the application.

Immigration and citizenship consultants represent one of Canada's fastest-growing regulated professions – providing much-needed competent and ethical services to ever-increasing numbers of migrants and refugees who hope to call Canada home. In our view, the establishment of a specific NOC for such professionals is much needed and long overdue. Please contact the undersigned directly should you require further information.

Sincerely

President & CEO