Audits and Reviews

Strategic Research and Review

Recherche et examen stratégiques

Audit of the Immigration Program
In the Canadian High Commission Islamabad

May 2000

Review Unit   Unité d'examen
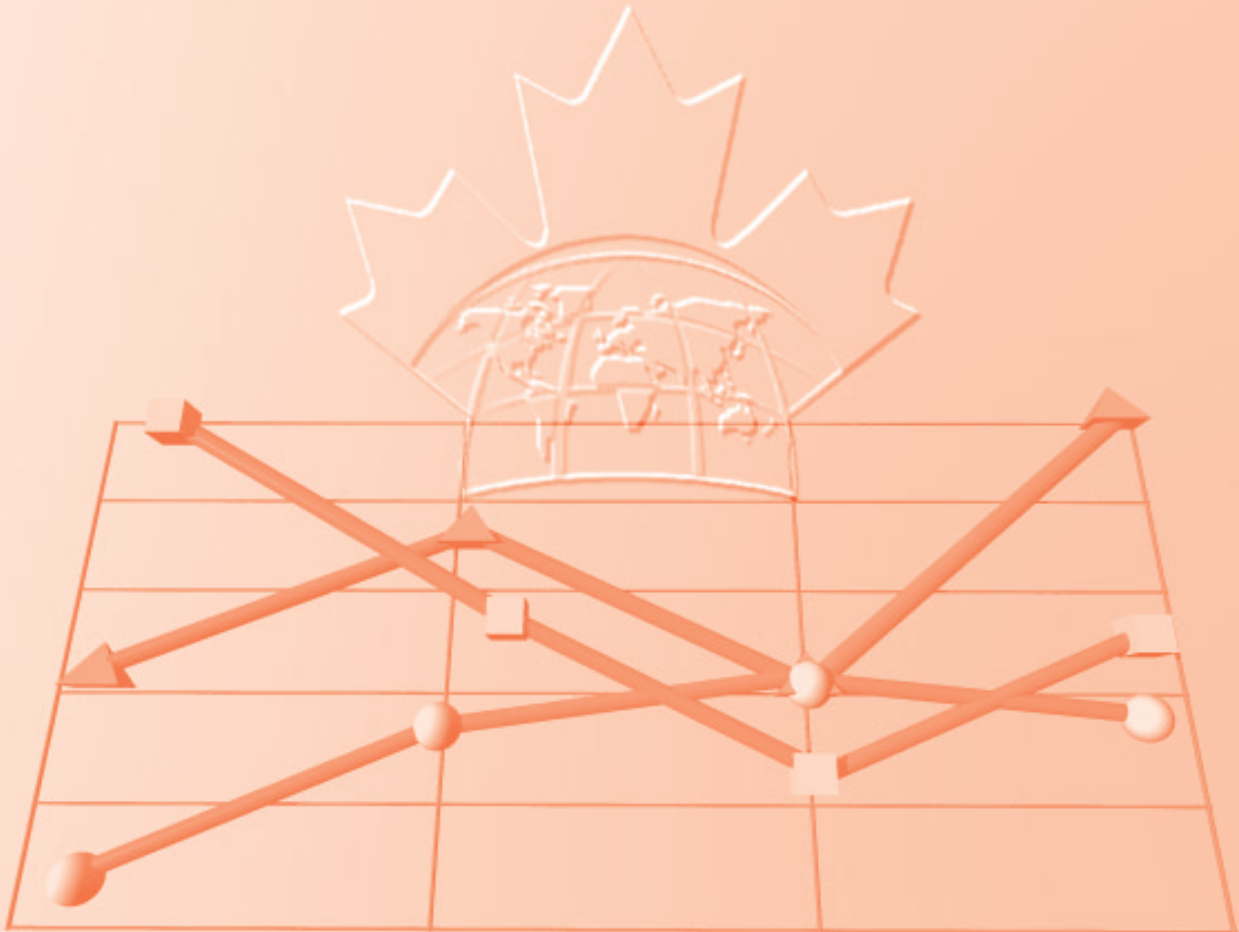
Canada

AUDIT OF THE
IMMIGRATION PROGRAM IN THE
CANADIAN HIGH COMMISSION
ISLAMABAD

AUDIT REPORT

**AUDIT REPORT OF THE
CANADIAN HIGH COMMISSION IN ISLAMABAD
NOVEMBER 1998**

1. INTRODUCTION

In November 1998, the Corporate Review Unit of Citizenship and Immigration Canada (CIC) conducted an audit of the Immigration Program delivered in the Canadian High Commission in Islamabad. The audit took place from November 1st to November 5th and was done in collaboration with the Office of the Inspector General of the Department of Foreign Affairs and International Trade (DFAIT). This joint initiative provided both parties the opportunity to consider the complementary nature of CIC and DFAIT activities.

2. AUDIT OBJECTIVE AND SCOPE

The overall objective of the audit was to examine the operational effectiveness of the Immigration Program Delivery in Islamabad and its compliance with CIC's procedures and sound management practices.

More specifically, the audit aimed to assess whether:

- The decision-making process for applications was efficient and well managed;

- Processing and right of landing fees were appropriately collected, accounted for and safeguarded;

- Key immigration documents were adequately protected and controlled.

During its visit, the audit team reviewed documentation and reports, interviewed Canada Based Officers and Locally Engaged Employees and reviewed a sample of immigration files and transactions.

In the area of immigration revenue and immigration documents the audit work was hampered by the fact that the CRO/FCO (Forms Control Officer) was absent during the week of the audit. Nevertheless, we were able to review a substantial portion of the cost recovery systems, procedures and controls in place, as well as certain aspects of immigration document control practices in place at the Mission.

This report presents the results of the audit.

Audit Report
Audit of the Immigration Program - Canadian High Commission in Islamabad
November 1998
Corporate Review Unit, CIC

2

3. BACKGROUND

The Immigration Program in Islamabad is operated by five Canada Based Officers (CBOs), including an Immigration Control Officer and 23 Locally Engaged Employees. As a full service mission, Islamabad offers immigration services related to all immigrant and non-immigrant categories. It also handles all steps of the process, from receiving the applications through to their final disposition, with the exception of medical decisions, which are handled by the New Delhi Mission. In 1998, Islamabad received approximately 4,291 immigrant applications of all categories and 10,665 non-immigrant applications.

4. OVERALL CONCLUSIONS

The rotation of Canada Based Officers, during the summer 1998, has substantially affected the immigration program in Islamabad. At the time of our visit, in November 1998, the immigration team, which had been in place for only two months, was operating under tremendous pressure. All Canada Based Officers were new to the Mission except for the Immigration Control Officer and all the more senior locally engaged employees had recently left the Mission, over the previous few years. In the Fall, the immigration program was left with virtually no institutional memory or stability. Canada Based Officers were left in a situation of having to learn the mission's specific processes before they could delegate even the most routine tasks in the organization.

In the course of our audit we observed a committed and hard working immigration team who were building practices and procedures to improve immigration program delivery. For example, challenges facing this new team were the family class backlog and long processing times in all categories. Since the summer 1998, the Mission has adjusted priorities to focus on Family Class processing and has introduced more efficient processing procedures. As a result, the family class backlog and processing times have been reduced substantially.

We also found a number of areas which need to be addressed in order to improve the delivery of the immigration program. Notably, efficiency gains could be obtained by a reorganization of various routine tasks, better documentation of cases in the Computer Assisted Immigration Processing System (CAIPS) and revised paper-screening and interview strategies.

In the area of immigration revenue and documents, a number of important controls and procedures need to be implemented and/or tightened to ensure adequate control. This includes the need for increased involvement of the Cost Recovery Officer in the ongoing monitoring of revenues and forms control.

The following paragraphs describe in more detail our main observations and recommendations. However, based on initiatives commenced during the audit and information on subsequent changes, it is our view that management is moving in the right direction in addressing the areas of concern raised in this report.

5. OBSERVATIONS AND RECOMMENDATIONS

5.1 MANAGEMENT OF CASE PROCESSING

Management of volumes and priorities

At the time of our audit, the immigration program in Islamabad had significant backlogs and long processing times. Based on the mission's operational statistics, immigration processing inventories totaled 8,669 cases as of April, of which 4,569 were pending paper-screening, 1,833 were pending interview and 1,425 were pending final decision. Most immigrant cases finalized in 1998 had required 27 months of processing times.

The audit team commends the program manager for having adjusted priorities to focus on family class processing as the number one priority, in accordance with Departmental norms. At the time of our audit, the program expected to eliminate the family class inventories by the end of 1998. Processing times for new Family Class Cases (FC1) have been brought down from well over one year to less than 6 months, which corresponds to the Departmental standard. This has been done by introducing efficient processing procedures such as issuing medicals up front and bringing cases which appear problematical to interview quickly.

The Immigration Program Manager also conducted a review of the refugee program and, at the time of the audit, refugee selection standards were being adjusted to bring them more into line with departmental guidelines and priorities. Refugee processing has become the program's second priority and resources are being shifted to handle CR1 processing and to come to grips with the serious CR3 backlog which has developed over the last two years.

Paper screening

We observed significant delays between the reception of applications and paper screening. The mission's strategy with respect to document verification appeared cumbersome to the audit team. Concerns about fraudulent documentation are well placed and mechanisms to address those concerns must focus on case resolutions and minimize processing inefficiencies. Furthermore, some cases had been delayed because officers were awaiting documentation which could have been requested earlier in the process.

Recommendation:

The mission should continue to review and clarify its approach with respect to document verification.

Program Assistants Responsibilities

Program assistants are responsible for a variety of tasks. These include interpretation, correspondence and other interactions for cases handled by the Canada Based Officer they assist. Program Assistants also answer phone inquiries which are not assigned on the basis of file responsibility.

Medicals -- The mission's recent approach of initiating medicals earlier in the process has already contributed to enhanced efficiency of case processing. The audit team believes that further efficiency gains could be obtained by centralizing and processing all correspondence related to medical requirements more systematically.

Inquiries -- The immigration section in Islamabad does not use an automated system to handle routine inquiries received by phone. All phone inquiries were being answered by three program assistants. This results in significant distractions from other tasks. The audit team believes that consideration should be given to the use of an automated system to answer phone call inquiries, as used in other missions. Furthermore, the mission does not systematically maintain statistics on inquiries received, even though a significant amount of time is spent on answering them.

Recommendations:

The Program Manager should
- review the distribution of responsibilities with respect to routine correspondence, such as the correspondence related to medical examinations, and assign them in a manner that would maximize efficiency
- review and adjust, if needed, the procedure in place to answer phone call inquiries, and
- put in place a procedure to keep records of inquiries the mission receives.

Management Response:

All routine tasks, such as issuing meds and dealing with correspondence related to medical processing, have been assigned to a specific staff member, though for each task there is at least one other person able to cover absences.

A request was made to mission management in June 1999 for Octel voice messaging to deal with immigration inquiries, but due to the frequent absences of

the mission technician and other matters this request has not yet been met, though it is expected that the system will be installed and operational by the end of May at the latest.

We do not consider that a record of all inquiries is necessary or practical, at least until an automated telephone inquiry answering system is operational. In 1999 Islamabad finalized 120% more immigrant cases, and issued 100% more immigrants visas, than in 1998. This increase in productivity was due to several factors, one of which was the elimination of work that did not move a case towards finalization. The section receives over 100-200 inquiries a day on average, by telephone, e-mail, fax, in-person, etc., most of which are routine, and has found it very difficult to respond to all inquiries in a timely fashion while maintaining these high levels of productivity. The introduction of a new process at this time, which would not expedite processing and would require the commitment of at least one full FTE, would be a step backwards. If/when backlogs are completely eliminated this recommendation could be considered more favourably.

CAIPS

CAIPS notes should contain enough information on cases to enable officers to rely on CAIPS for routine follow-up, without having to pull physical files. For instance, details of requests for additional documents should be listed to facilitate follow-up of those documents. The audit team also observed that the mission's procedures with respect to the nature of the information to be entered in CAIPS is not clear. The team also identified a number of files where the information needed for effective monitoring and resolution of cases was incomplete.

Furthermore, the audit team noticed cases where the information entered in CAIPS on the status of the case did not reflect the information contained in the physical file. In such cases, it appears that the decision making process had been suspended because the case status in CAIPS did not indicate the readiness for further steps. Incomplete or inaccurate information may also affect operational statistics on inventories.

Finally, CAIPS did not indicate other key information that would provide better control on the process, such as the POS+ receipt number, information on who immigration documents were sent to or given to, whether FOSS had been verified, whether a police certificate had been received, etc.

Recommendation:

The Program Manager should
- develop an office procedure with respect to CAIPS notes and communicate it to all staff;

-   undertake a review of all pending cases to ensure that the status on CAIPS reflects the real status of cases.

Management Response:

It is presumed that most of the above-mentioned references to inadequate notes in CAIPS refer to entries made prior to the arrival of the new CBO team, as clear instructions on the entry of notes into CAIPS was given to all staff once they had arrived, in September 1998. This was followed-up by a full day training session for all visa section staff in January 1999, half of which dealt with the entry of notes into CAIPS. Further training to reinforce these practices was given in January 2000. All of the examples mentioned above have been dealt with (though of course human error continues to occur, ever more infrequently it is hoped), with the exception of three in the last paragraph. The entry of POS+ receipt numbers, and more detail on who documents were sent or given to, will begin now. FOSS verification is included in security screening.

The implementation of the second recommendation would probably require that we close the visa section to all other work for several weeks, as there are currently about 9000 files in active process, and 900 more pending receipt of complete application forms or correct fees, and some files could take an hour or more to fully review. We therefore view this recommendation as unrealistic and, given the training that has been given since the audit, and the ongoing monitoring of all files in process, unnecessary.

Quality Assurance

Even though there are no systematic quality assurance mechanisms to monitor the quality of the decision making process, the Immigration Program Manager assumed that function by reviewing and processing most cases when he arrived in the early fall, as very limited resources were available at the mission to process cases at all. That provided him a good understanding of how the immigration program was being implemented in the mission and allowed him to make sound adjustments on the process. We believe such mechanisms are important. As more officers are involved in decision-making, we encourage the program manager to institute systematic quality assurance mechanisms.

Recommendation:

The Program Manager should implement systematic quality assurance mechanisms to monitor, on a continuous basis, compliance with departmental standards, priorities and policies and to ensure consistency among officers.

Management Response:

Once all paperscreening backlogs were eliminated, a random selection of cases was chosen and interviewed in June 1999, from amongst those in which interviews had been waived at paperscreening, as a quality control exercise. No evidence was found of misjudgements or errors at that time. We intend to repeat this exercise in June of this year. The program manager attempts to monitor compliance with departmental standards, priorities and policies by periodically reviewing several hundred files at various stages of processing, from BF and other lists generated by CAIPS, and on a day to day basis by answering almost all representations received from parliamentarians and NHQ, often after discussing the case with the officer concerned. The supervisors of immigrant and non-immigrant processing deal with other non-routine representations in the same fashion, and also review periodically cases in process and decisions taken by those reporting to them. Given the volume and diversity of representations received, and the fact that most non-routine representations concern perceived complications in processing, this combines quality assurance with problem solving, and usually moves a case towards finalization. At this time, most screening is done by expatriate staff who are not authorized to make selection or final decisions, though they have been trained to screen and their work is carefully monitored by CBOs. This means that almost all cases have been seen by at least two persons, and often by more, including two or more CBOs.

Human Resource Management

° **Institutional Memory and Training**

The Immigration Section in the Islamabad Canadian High Commission had been affected by a major turnover of Canada Based Officers during the summer 1998. During that period, four of the five Canada based officer mission complement were rotated, including the program manager. From mid-July to late August, three Canada Based Officers were operating the mission: the Program Manager, the Immigration Control Officer and a temporary duty officer. Such an important shift in Canada Based Officers has significantly affected the stability of the organization. This was reinforced by the fact that the mission had recently lost locally engaged employees. The immigration program was left with virtually no institutional memory. Canada Based Officers were left in a situation of having to learn the mission's specific processes before they could delegate even the most routine tasks in the organization.

Recommendations:

Headquarters should plan rotation of Canada Based Officers in such a manner that would limit the impact on the Mission.

The Program Manager should assign a CBO to replace the responsible cost recovery officer in his absence and provide that employee the necessary training.

Management Response:

Personnel (RIR) always considers the number of Canada based officers scheduled to depart a mission, when making assignment decisions. To the extent possible complete turnover is avoided. Efforts are also made to allow overlap between departures and arrivals of key personnel. During this handover period valuable information can be transferred from one officer to another.

Mission - A CBO was trained as a backup cost recovery and CAIPS manager within two weeks of the departure of the audit team. An expatriate LES has also been trained to use CAIPS Command Mode and she and other expat LES function part-time as CAIPS Operators.

° **Communication**

There is a general feeling among the staff that they are being left "out of the loop". Office meetings involving all levels of staff on a more regular basis would be beneficial. Regular meetings between the Program Manager and Canada based officers would provide a means to discuss and gain a common understanding of program related issues.

Recommendation:

The Immigration Program Manager should meet the Canada Based Officers, as a team, on a regular basis. He should also meet all staff on a regular basis.

Management Response:

Meetings of all CBO or of all staff are not held "regularly", but are held more often than was previously the case. As there are few shared interests and concerns between staff working on immigrant and non-immigrant processing it is the program manager's view that such general meetings are necessary only when there is a specific issue to be addressed. When such meetings are held, LES appear disinclined to "speak up", perhaps due to a reluctance to question authority, which is common in this culture. They are more willing to do so in a smaller group, however, so regular meetings are held within the various units: non-immigrants, immigrants, immigration registry, etc. Meetings are also frequently called to discuss issues, such as medical issuance and processing, practices at immigration reception , student processing, etc., with those concerned, and e-mail is much used

to disseminate information and engage in discussions. The program manager and supervisors also make a point of speaking to each of their officers, and most of the rest of their staff, almost every day, even if it is just a greeting, so that each individual staff member has the opportunity to raise any concern they might have. It is recognized that this is not the same as a meeting, but 1999's high productivity was largely due to the concentration of effort on case processing. As 2000's FD target is 6,000 cases, it is difficult to justify having all officers, or all staff, spend even -1-2 hours per week in meetings that do not seem to be necessary, given the less frequent but more focussed small group meetings, and other points of contact mentioned above.

° **Staffing**

Emergency LES continue to be employed at the Mission for periods of time well in excess of the established guidelines.

Recommendations:

The Mission should identify all long-term emergency LES positions to Headquarters (International Region).

Headquarters should decide whether or not to regularize their positions.

Management Response:

This recommendation concerns emergency employees. The following excerpt from a draft memo to CIC's Executive Committee on incremental human resource allocation addresses this recommendation.

In January, 2000 CIC participated in a series of meetings hosted by DFAIT known as the OGD consultations. The purpose of these annual meetings is to coordinate all aspects of resource deployment abroad, in particular, requirements for new buildings and expansion of existing offices to accommodate incremental staff. At these meetings there was agreement that a number of Missions abroad had reached a threshold in terms of space to accommodate additional staff and therefore deployments to those Missions could not proceed in 2000-01. For CIC these Missions were Moscow, Kiev and Islamabad.

Mission - Emergency staff have been engaged to assist in the elimination of backlogs. While the paperscreening backlog has been eliminated, there is still an inventory of cases pending interview. Once all backlogs have been eliminated, which may happen as early as the end of 2000, the new management may review the long-term staffing needs of the section.

A request was made in 1999 to regularize 3 emergency paperscreening positions as expatriates. This was approved by CIC, however, DFAIT regularized them as regular LES not expats. Given the very high potential for fraud and malfeasance, which was manifested by the firing of LES (including an LEP with 24 year's experience) in 1997 and 1998, the positions were not staffed. There will always be a need for some expatriate staff in Islamabad, yet DFAIT will not consider the regularization of emergency expat LES positions, despite the existence of three LEP expat positions already. This makes it impossible for the mission to make responsible recommendations on regularizing LES, and requires the employment of large numbers of expats as emergency staff or otherwise.

Meanwhile, an increase in the number of non-expat LES has been sought on several occasions over the past year. This request will be repeated in the next personnel resource IRIMP exercise.

5.2 CONTROL OVER IMMIGRATION REVENUE AND DOCUMENTS

Protection of the "POS +" System

The POS+ system captures and processes most information needed to manage revenue collection in the Mission. To be able to rely on that system, the Mission must rigorously control and protect the access to the software and the data and applications it contains. We found that improvements are needed to meet that objective.

Recommendation:

The Immigration Manager should protect the POS+ system and the access to the information and application its contains.

Management Response:

With rare exceptions, only one LES uses POS+. In his absence, two others have done so, but only under the careful supervision of the cost recovery officer. There should therefore be little question of responsibility should any malfeasance be detected. The POS+ workstation is located in a room to which only two LES and two CBOs have access, the other LES being the visitor visa assistant, as visitor visas are printed in the same room and are also carefully controlled.

Reimbursement of Right of Landing Fees (ROLF) and Visitor Visa Fees

A significant number of Right of Landing Fees (ROLF) of $975 per immigrant applicant are being refunded to applicants each month, whenever a final decision has been made to refuse the applicant. Although applicants can pay the ROLF once a decision has been made on their application, several applicants choose to pay the ROLF at the moment they make their application. The refund process in place does not include the controls needed to prevent, in a satisfactory manner, the risk of inappropriate payments occurring. The weaknesses observed are related to the need to ensure that reimbursements are authorized by the immigration section (as per section 34 of the Financial Administration Act), prior to initiating payments by DFAIT's finance function, and the need to ensure that reimbursements are sent at the right address.

> Recommendation:
>
> Adequate procedures and control mechanisms must be developed and applied to ensure ROLF refunds are effectively processed and controlled, and that no double payments or other inappropriate payments occur.
>
> Management Response:
>
> At the moment, there are very few ROLF refunds, as most applicants appear to choose to pay ROLF only when processing is positively completed. Those refunds that are given are authorized by a senior CBO.

Protection of Immigration Documents

We found that improvements are needed to ensure better control and monitoring of immigration documents.

> Recommendation:
>
> The Immigration Program should ensure that spoiled/voided visitor visa labels are adequately documented and that systematic daily reconciliation procedures are implemented to account for the utilization of documents.
>
> Management Response:
>
> All key forms and visitor visas are held by CBOs only, and are reconciled by the relevant CBO at the end of each day. Quarterly inventories of forms are current.

Resources allocated to Manage Immigration Revenues and Documents

Although the audit team could not precisely measure the time and efforts spent by the Cost Recovery Officer/Forms Control Officer to perform duties related to the control of immigration forms and revenues (as the Cost Recovery Officer/Forms Control Officer was away at the time of the audit), it appeared that the organization would greatly benefit by allocating more time and continuity to these monitoring and control functions. To achieve the above, it is imperative that the Immigration Program Manager fully support and provide sufficient time for the Cost Recovery Officer and Forms Control Officer to perform monitoring and control functions. Such functions need to be performed constantly, consistently and effectively, in order to yield benefits, and value-for-money for the Mission.