



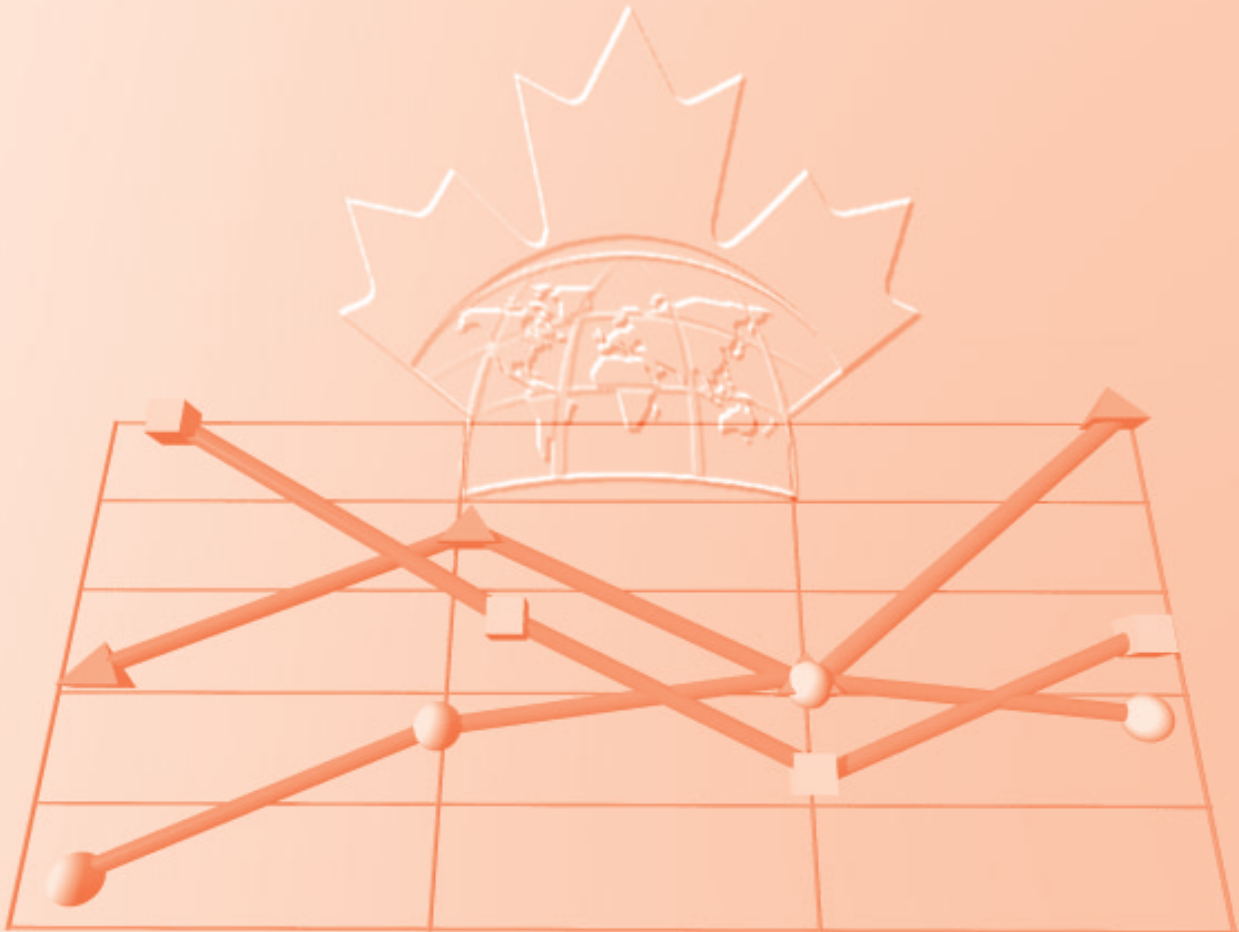
# Audits and Reviews

STRATEGIC RESEARCH RECHERCHE ET EXAMEN  
AND REVIEW STRATÉGIQUES

## Audit of the Immigration Program In the Canadian High Commission New Delhi

May 2000

REVIEW UNIT UNITÉ D'EXAMEN



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**AUDIT OF THE  
IMMIGRATION PROGRAM IN THE  
CANADIAN HIGH COMMISSION  
NEW DELHI**

**AUDIT REPORT**

CORPORATE REVIEW UNIT  
CITIZENSHIP AND IMMIGRATION CANADA  
MAY 2000



**AUDIT REPORT OF THE IMMIGRATION PROGRAM  
CANADIAN HIGH COMMISSION IN NEW DELHI  
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 New Delhi Canadian High Commission. The audit took place from November 9th to November 20th. It was conducted in collaboration with officials from the Office of the Inspector General of the Department of Foreign Affairs and International Trade (DFAIT), who were auditing DFAIT's program at the same time. 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 New Delhi 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, promptly and adequately accounted for, and safeguarded;
- key immigration documents were adequately protected and their utilisation controlled.

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

This report presents the results of our audit.

**3. BACKGROUND**

The Immigration Program in New Delhi is the largest mission among Immigration Offices abroad in terms of number of employees, and one of the larger missions in terms of number of applications received. It is operated by 18 Canada Based Officers (CBOs), 2 Canadian Medical Officers, and 89 Locally Engaged Employees, including locally engaged officers.

New Delhi is a full service mission. It offers immigration services related to all immigrant and non-immigrant categories. It also handles the full decision making process, from receiving the applications through to the final disposition of cases. New Delhi covers a wide territory and immigration officers travel to seven cities. The medical unit of New Delhi is also responsible for making medical decisions on cases processed in Islamabad.

Case processing functions through two distinct sections: the immigrant processing section, composed of three immigrant processing teams, and the non-immigrant processing section. The immigration program is also supported by functional units -- the Case Analysis Unit, the Appeals and Litigation Unit, the Immigration Control Officer Unit and the Medical Unit.

In 1997, New Delhi received approximately 16,600 immigrant applications for all categories and 35,500 non-immigrant applications. During that same period, it collected approximately \$13 million in processing and right-of-landing fees.

#### **4. OVERALL CONCLUSION**

The delivery of the immigration program was well managed in the New Delhi Mission. The mission is constantly trying to find ways to enhance its efficiency and effectiveness.

Recent initiatives have been undertaken to streamline procedures, tighten controls and improve the quality of service to clients. For instance, a case analyst unit, made of locally engaged employees, has been created to conduct initial screening of immigrant applications. Correspondence for medical requirements have been centralised in the registry. Internal standards for "brought forward notices" were also being developed to reduce unproductive time spent on pulling files. An appeals and litigation unit has been created to co-ordinate and provide advice in the area of appeals and litigation. The non-immigrant processing unit has implemented streamlined procedures with respect to receiving applications for same day service.

Procedures were clear and well understood by employees and good management tools had been developed to monitor overall workload and performance. Processes and procedures were well documented, logs and registers were maintained to account for various individual interventions and operational reports were used to monitor, on a regular basis, the processing performance of the mission.

Our review of the management processes also revealed some areas where we believe that improvements are needed. Efficiency gains could be obtained by restructuring the activities in the registry, by improving the information system that supports the medical decisions, by reviewing the distribution of responsibilities between program assistants in the immigrant section and by systematic input of additional information in CAIPS notes for better monitoring of cases. Better information could also be provided to applicants

who are subject to medical surveillance. More systematic quality assurance reviews are necessary to ensure that cases are processed in a consistent manner. Interviews for immigrant applicants need to take place in an appropriate physical environment. As well, training should take place to ensure proper continuity in key functions.

In the area of the management of revenue and immigration documents, the Mission has implemented during the last year a number of new procedures and internal controls involving the handling of public money and of key documents. These procedures constitute a solid base upon which additional internal controls should be implemented to ensure comprehensive safeguarding of funds and forms.

However, our audit revealed that the mission needs to improve the control over collection of immigration revenues. We noted weaknesses in the protection of the collection of revenue information system (POS+), the protection of immigration funds and in the reconciliation of immigration revenues to the Mission's accounting statements. We also noted that improvements are required to effectively control immigration documents.

The next sections of this report contain more detailed discussions and recommendations on matters that we judge important to the operations of the immigration program. While our observations are based on our review of the mission's operations, recommendations to address certain matters are directed to Headquarters given its role in issues for which the mission has limited control, or for issues that go beyond one specific mission.

## **5. OBSERVATIONS AND RECOMMENDATIONS**

### **5.1 MANAGEMENT OF CASE PROCESSING**

#### **Case Analyst Unit**

Approximately one year prior to our audit, a Case Analyst Unit was created to streamline paper screening of applications. Management has made innovative use of the Case Analyst competencies by having them review and make recommendations on cases. Each case analyst must be supplied with adequate tools such as CCDO and NOC manuals in order for the unit to be most effective, as sharing these tools results in valuable time lost.

#### Recommendation:

As the Case Analyst Unit is a pilot project, we recommend that the Immigration Program Manager undertake an evaluation of the merit of this initiative.

#### Management Response:

While the CAU is constantly reviewing its practices and procedures, the resources dedicated to it from its inception show that it was conceived as a permanent

feature of our operations. It was never seen as a “pilot” and ongoing review since the audit has confirmed its viability for this post. Given processing demands, it will remain in place and may take on expanded responsibilities. In fact, management has been successful in obtaining additional resources through the IRIMP process and will be increasing the current complement of IPOs and Case Analysts.

Sufficient copies of CCDOs and NOCs were provided to CAU staff some months ago.

## **Registry**

New Delhi has a large registry which relies on 27 employees, including the registry supervisor. A review of the registry activities reveals that the files are being passed and reopened by different employees to handle short routine tasks many times during a very short period. Efficiency gains could be obtained by reorganizing some functions within the registry and to make better use of available resources.

Management has already indicated its intent to take a closer look at the registry.

### Recommendation:

The Immigration Program Manager should, as was his intent at the time of the audit, review the registry function in an attempt to streamline activities.

### Management Response:

The Registry function and its physical organization were reviewed extensively resulting in enhanced roles, accountabilities and physical changes which all have had a positive impact on program integrity. All queries received in initial stages of processing are now actioned by registry, including case status requests from Members of Parliament, agents and CIC offices. All incoming correspondence is now reviewed and screened by recently created Asst. Level 4 so decisions could be taken on most incoming correspondence without delays and referral to Interviewing Teams. Physical changes and improved security measures were also implemented which now limit access to the registry. Staffing of a new Assist 6, Case Analyst in the registry is near completion. This new senior position will enable more decisions on incoming documents that will facilitate finalization of cases in process.



## **Medical Requirements**

The New Delhi Immigration Office is responsible for administering requirements with respect to medical clearances for applications being processed in New Delhi and Islamabad.

General and non-confidential correspondence related to medical requirements is centralized and handled by an employee in the registry. We consider this an efficient practice to handle this major step in application processing.

Once the medical examination has taken place, medical results are sent directly to the Mission's Medical Officer in charge. Results are then reviewed and a medical decision is entered in CAIPS by the clerks. Data entry occupies three employees on a full time basis. That activity is time-consuming because of the slowness of the system, especially for entries made in CAIPS for Islamabad.

There is no systematic quality review done to ensure that cases have been processed adequately both in terms of decisions and data entry. While the medical officer systematically reviews all cases where medical conditions are not "M1", the extent of his review is minimal for cases which do meet the M1 conditions. All cases are initially reviewed by a nurse and if they are M1 they are normally processed in CAIPS without being reviewed by the Medical Officer. We believe that this practice should be accompanied by a systematic in-depth review on a random basis to ensure quality in the initial screening process. Given that medical decisions are entered in CAIPS by assistants after the medical decision has been made, we also believe that random verification should be done to ensure that information entered in CAIPS reflects the medical decision taken.

For cases which require medical surveillance, we are concerned by the limited information given to applicants. Some information is included on immigration forms but it can be very difficult to understand from an applicant's point of view. We realize that this situation is not limited to New Delhi. Considering the importance of ensuring that applicants comply with medical surveillance requirements, we believe that additional information should be provided to applicants to clearly explain the reasons for the importance of medical surveillance, the importance of complying and the information needed to do so.

### Recommendation:

- a) Headquarters should examine alternatives to speed up the medical decisions entry process.
- b) The Immigration Program Manager should implement a quality assurance process to ensure that the various screening decisions are being properly made and that the information entered in CAIPS reflects decisions taken.

- c) Headquarters and the Immigration Program Manager should work together to develop an information letter to be given to the applicant along with immigration documents providing information about medical surveillance.

Management Response:

- a) From HQ: New Delhi now has IMS. This system simplifies and improves the reliability of transfer of medical decisions to the CAIPS databases in New Delhi and Islamabad.

Mission: A new IMS (Immigration Medical System) application was installed in Mar 2000 and is presently in a shakedown period. It remains to be seen if it is faster than entering directly into CAIPS. There normally should be 4 clerks dedicated to data entry. In the old system one of the four was tasked with verifying records via remote CAIPS to Islamabad.

**Inquiries**

The New Delhi mission uses an "OCTEL" system to handle phone inquiries and to provide information to clients. The mission also has an information unit which handles inquiries. We found inconsistencies in the interpretation of the role of the information unit.

We also noted that logs kept by the mission to monitor inquiries from Members of Parliament did not reflect the actual status of inquiries received. Most inquiries had in fact been addressed where the logs showed that they were outstanding. Management had already started to address the problem during our visit.

Recommendation:

The mission should clarify and communicate to all employees its policy on inquiries.

Management Response:

The Octel system has been "re-recorded" to provide further clarification on how clients can obtain information related to immigration. The staff in the Information Unit have been provided formal training on the kind of information that can be released, procedures in dealing with client specific information and the proper documenting of information either given or received relating to specific cases. Similar training has also been provided to the staff in the Office of the Canadian High Commission in Chandigarh, including clarification on roles and responsibilities between the Information Unit in Delhi and the Chandigarh Office

## CAIPS

The Mission makes good use of CAIPS. It also has extensive in-house expertise in “CAIPS command mode”. It uses that expertise to generate useful information to manage and monitor its workload and performance.

In general, the cases we reviewed were appropriately documented in CAIPS. Officers and staff made good use of CAIPS notes to document key information that is not gathered in various data fields, including key information related to positive non-immigrant decisions. For the most part, these notes are concise and complete. However, the notes did not always include clear indications of the reasons for recommending an interview and did not always allow for a focused interview without a more detailed review of the paper file. For the cases we reviewed that were “M-3”, there was no indication in CAIPS notes that the officer considered the M-3 results during the review of funds.

We also noticed cases where the cost recovery receipt number was entered in CAIPS, as required by the mission’s procedure, but did not match the physical receipt kept in the physical file. In such cases, the goal of maintaining a transactions trail in CAIPS would not be achieved should there be a need to review the records. Furthermore, we believe that CAIPS notes should also include some information on how immigration documents have been delivered to the applicant to provide a transaction trail should it become eventually necessary to review a processed case.

### Recommendation:

The Mission should review its requirements with respect to CAIPS notes and communicate them to employees.

### Management Response:

Since the audit, analysts in CAU have been provided more concise instructions and guidelines on indicating as clearly as possible why interview waiver is recommended or interview required. As a result of these instructions, officers feedback indicates that they can now conduct more focused interviews because of review notes. Recent TD officers who have been in other posts without a review unit have informed us that they are able to do more interviews at this post because of the detailed, focused notes from the CAU.

With regard to entering in CAIPS the actual cost recovery receipt number, a review of our procedures shows we do not require this kind of entry. Such a requirement would be too cumbersome and would create an inefficient step in the process, when current procedures ensure a copy of the receipt is stapled to the file

with all pertinent information. In our opinion, this provides a sufficient and practical paper trail. CAIPS notes include information on how and when immigration documents are sent to clients, particularly when returning original documents to the client or issuing the visa.

## **Monitoring and Quality Assurance**

The Mission has developed good information management tools to monitor its overall activities. Senior management obtains, on a regular basis, reports which contain relevant management information to follow key factors such as processing volumes and times, inventories, etc. The appeals and litigation section also provides analysis and information which is communicated to officers and allows them to improve case processing.

Even though the Mission has a number of control points in the process to control quality, it does not conduct systematic quality assurance reviews to ensure that cases are processed in a consistent manner. This particularly applies in the immigrant section where there is little rotation of employees within teams and where the team works independently from other teams, as opposed to the non-immigrant section where employees work with different colleagues.

### Recommendation:

The Mission should establish a quality control mechanism to ensure that cases are processed in a consistent manner.

### Management Response:

In terms of consistency of decision making, it is not possible to ensure complete consistency among nearly 20 interviewing officers. However, we strive constantly to ensure consistency of process. This is done through regular meetings within the teams, monthly all officer meetings, weekly supervisors meetings, wide distribution of HQ messages by e-mail and a recently created electronic manual containing local processing information. This manual is accessible to all staff. Quality control exists in the CAU with all recommended waived cases reviewed by a CBO and all visa issuances completed by CBOs. As we expand the decision-making function of the CAU, we will put in place a system of regular, random checks of files that will control quality of decision-making. We also have implemented a rotation program between officers in non-immigrant and immigrant processing which will further add to quality assurance

## **Accommodation for Interviews**

The Immigration Program Infrastructure was physically designed with numerous interview booths intended to provide an adapted space to allow officers to meet applicants. However, these interview booths are used on a very limited basis because they are considered to be inadequately designed.

## **Human Resource Management**

Most locally engaged employees' appraisals have been maintained up to date. However the process of setting objectives, mid-term review, etc. for the officers is not consistently followed. Training/guidance on the appraisal process could be improved.

### **a) Roles and Responsibilities**

In the immigrant section, there appears to be little difference in workload between the Canadian and local officers, and therefore little difference in the demands placed upon Program Assistants working respectively with them. The main difference, however, is that the Program Assistants working with Canadian Officers are required to provide interpretation services at interviews 4 days per week, and therefore have much less time to do the other tasks required. Management may wish to consider re-aligning some of the work of the Program Assistants, possibly by sharing the interpretation workload with the Program Assistants of the local officers, or giving the local officer's Program Assistants more responsibilities.

### **b) Training**

The functions of the Immigration Cost Recovery Officer and Cost Recovery Clerk are key positions to ensure due control of revenue collection and immigration documents. At the time of our audit there were no employees who were fully-trained to replace these employees should they be absent or leave the Mission.

#### Recommendation:

A backup for the Mission's Cost Recovery Clerk and for the Immigration Control Officer should be designated and fully trained.

#### Management Response:

A backup for the Cost Recovery Clerk was appointed some months ago and formal training was provided. The back up employee now spends two hours every Friday with the Cost Recovery Clerk to ensure continued knowledge and backup capability

### **c) Communication**

Many officers referred to the time when weekly officer meetings were held, and issues, procedural changes, etc., could be discussed. Many officers indicate that they feel out of the loop, that e-mail communication does not compensate for the ability to share experiences, ideas and concerns in person.

#### Recommendation:

The Immigration Program Manager should review communication mechanisms to ensure that they meet the needs of employees.

#### Management Response:

Management has recently reviewed communication mechanisms in light of the recent Public Service Survey Recommendations and has developed and implemented an action plans to address the recommendations in this area as a high priority. As part of the action plan, management has incorporated “all officers” meetings that are held on the last Thursday of each month. Open and transparent discussions are encouraged where various issues and subjects ranging from operational procedures, processes and policy to work environment can be addressed.

### **d) Staffing**

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

#### Recommendation

- a) The Mission should identify all long-term emergency LES positions to Headquarters (International Region).
- b) Headquarter should decide whether or not to regularize their positions.

#### Management Response:

- a) Since the audit, virtually all temporary and emergency staff have been regularized or otherwise terminated. Currently, the program has 4 emergency workers filling seasonal short term operational needs. None have been in place longer than 125 days.

b) Any emergency positions in New Delhi at the time of the audit team visit have either been regularized as of April 1, 1999 or are no longer staffed.

## **5.2 CONTROL OVER IMMIGRATION REVENUE AND IMMIGRATION DOCUMENTS**

### **Documentation of Procedures**

The mission has invested significant efforts in analysing and building control systems and procedures at the Mission. These efforts have led to improved control procedures which had not, at the end of our visit, been documented. It is important that these procedures be documented to ensure that the mission maintains and develops its knowledge and understanding of revenue and forms control procedures.

#### Recommendation:

The Immigration Program Manager should ensure that current control systems and procedures in place, as well as those to be implemented, as discussed, are properly documented.

#### Management Response:

Several drafts of written procedures have been done a final draft for managerial approval will be submitted after the Summer peak season.

### **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 rigourously control and protect access to the software and the data it processes. While a large number of controls were properly implemented, some others were lacking.

#### Recommendation:

The Immigration Program Manager should ensure that the POS+ system and the access to the information and applications it contains are protected.

#### Management Response:

Access to POS+ has been restricted as per the recommendation.

## **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. Although applicants can pay the ROLF once they receive a decision on their application, many applicants choose to pay the ROLF at the moment they make their application. The refund process in place at the time of our audit could not prevent, in a satisfactory manner, the risk of inappropriate payments occurring. The weaknesses observed in the process were related to the need to ensure that reimbursements be authorized by the immigration section (as per section 34 of the Financial Administration Act), prior to initiating payments procedures in the DFAIT finance function, and the need to ensure that the mission has the right address of the applicant. While the audit team was in the mission, the immigration section had already started to address the issue and the audit team assisted the mission in developing a revised procedure. After the audit, the immigration section implemented an improved procedure to ensure appropriate control over reimbursement of ROLF. We are of the opinion that the revised procedure is appropriate.

## **Reconciliation of Immigration Funds**

The audit team noted deficiencies in the reconciliation process being used to account for collected revenues. These deficiencies are related to the responsibility of safeguarding reconciliation documentation and reports and to analysis being performed to ensure that all immigration revenues have been completely and promptly deposited in the bank.

### Recommendations:

- a) The Immigration Program Manager should ensure that: the immigration section retain possession of all of immigration's daily revenue documents after reconciling these, as well as Immigration's revenue control log book initialed by the Cashiers and the Cost Recovery Officer.
- b) The Accounting Section sets up its own control logbook. This account control logbook should be initialed by all parties taking part in the daily exchange of immigration revenue documentation from the bank to Accounts.
- c) The Immigration Section should reconcile immigration revenues to the month-end bank statements, and verify if the financial codings used by the accounting section in the Mission Finex system are accurate.



Management Response:

The immigration Cost Recovery officer personally reconciles all three bank cashiers daily and retains possession of the daily revenue documents. By doing so, the officer ensures that the three daily revenues collected are equivalent to the bank deposit and line object summary (1203A). In addition, a log book is kept to track the daily revenues and is monitored by the Cost Recovery officer, the bank and the mission financial section.

Reconciliation of immigration revenues to the month-end bank statements is currently done by the Mission accounts section. We do not complete a separate reconciliation as we do not feel that this duplication of effort is time or cost effective. We have no indication that Citizenship and Immigration Canada is not receiving the full amount due it by DFAIT

**Monitoring of the effectiveness of internal controls**

The Mission has implemented a number of excellent testing and monitoring procedures on revenue collection and forms controls. To be effective, these tests must pursue all transactions trails for each item being tested in order to "close the loop" of the control process. Furthermore, control tests must be performed on an ongoing basis. Finally, we believe that an analytical review to monitor collected revenue against key indicators, such as the number of applications received, could provide useful information to examine the integrity of revenues.

Recommendation:

- a) The Immigration Program Manager should ensure that additional ongoing controlling and monitoring procedures are implemented to ensure that all key internal controls over revenues function as intended. This will require that the Mission give sufficient time to perform these duties to the responsible officer.
- b) Headquarters should develop analytical tools to support the missions in managing the revenue collection function.

Management Response:

We conduct appropriate tests when time permits. However, these are very time-consuming, and at certain seasons of the year the Immigration Cost Recovery officer is primarily occupied with visitor visa processing issues. We need more resources to fully implement a proper year round schedule of internal audits and testing. We would welcome new tools/procedures and feel that Headquarters is best placed to provide them.

