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Evaluation of the Immigration National Security Screening Program: Appendices

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Appendix A: Management response and action plan

Recommendation 1

1. The VP of Intelligence and Enforcement (I&E) should strengthen the measurement of the Program's performance. This includes:

- a. revising the logic model to ensure that the immediate and intermediate outcomes fully capture the Program's intended objectives and include logical flow from one outcome to the other
- b. revising the key performance indicators (KPIs) to align with the objectives in the revised Logic Model and assist NSSD's leadership with performance management accountability and decision-

making. The new KPIs should include establishing internal processing times that are independent from service standards communicated to Immigration, Refugees and Citizenship Canada (IRCC)

Management response

The VP of I&E agrees with the recommendation to strengthen the measurement of the Program's performance. The National Security Screening Division has introduced many improvements to performance measurement over the last four years, but remains limited by an aging case management system and database of security screening activity. Planned improvements to the program's IT infrastructure will enhance tracking of immigration security screening activities and support greater sophistication in performance measurement.

The Finance and Corporate Management Branch has already been engaged to revise the logic model to improve alignment of performance outcomes.

Management action plan	Completion date
Undertake internal consultations to establish internal service standards for case processing times.	May 31, 2021
Review and revise the immigration security screening program's Performance Information Profile (PIP), including Key Performance Indicators (KPIs).	June 30, 2021

Recommendation 2

2. The VP of I&E should enhance the NSSD's Surge Capacity Plan, so as to develop additional capacity within the Canada Border Services Agency (CBSA) to support a sudden surge in referrals. This includes the consideration of:

- a. identifying staff within CBSA, including Regional staff, who are able to conduct screenings and who can quickly be deployed on a part-time or full-time basis, and for an extended period if necessary
- b. providing regular training and refresher training to the above-identified staff
- c. applying QA to security screenings conducted by the above-identified staff

Management response

The VP of I&E agrees with the recommendation to enhance its surge capacity. The most recent surge support in 2018 was successfully supported by members within the National Targeting Centre (NTC) and the Border Operations Centre (BOC), given their familiarity with the required enforcement systems. A three-day (refresher) to five-day (full instruction) training course was provided on the refugee business line, the most probable business line to experience a surge. The NTC, BOC and recent former NSSD employees employed within other areas of the Agency are viewed as the optimum target groups to support with a surge. The NSSD will also conduct a preliminary feasibility study to consider regional staff its surge plan.

Given the likelihood of a significant time gap between the need for surge support, staffing turnover within these areas make it impractical to implement a regular/recurring training schedule, and to identify staff too far in advance of the need. The VP of I&E will, however, work to

enhance the readiness of a surge capacity plan by ensuring that a tailored training product remains updated and ready to deploy when required.

A QA framework exists. The applicable geographic desks within the NSSD will conduct systematic quality assurance reviews of the work being completed by surge support members using the NSSD's existing QA framework to ensure adherence to NSSD processes.

Management action plan	Completion date
The NSSD will update its tailored training products for the refugee stream so that it is ready to deploy when the need arises.	July 31, 2021
The NSSD will conduct a preliminary feasibility assessment of incorporating regional staff in its surge plan, including the impact of training, IT scalability, and information security; to be approved by the VP.	July 31, 2021
Review and update the QA framework if there are changes to the surge response posture as a result of the feasibility assessment.	September 30, 2021 (if required)

Recommendation 3

3. The VP of I&E should advocate for clearer articulation of the objectives of the new thematic indicators and their expected impact on the security screening process, and for the establishment of mechanisms to track the achievement of these objectives. This includes:

- a. advocating for the IRCC to develop and implement a standardized mechanism to track the specific security indicator(s) that trigger referrals to NSSD; this should allow for regular monitoring of their usage by IRCC missions and of the impact on the number of referrals made
- b. advocating for the development and implementation of a strategy to measure the ongoing effectiveness of the new thematic indicators in terms of their impact on the quality of referrals sent to NSSD

Management response

The VP of I&E agrees with the need for thematic indicators and an indicator tracking mechanism. Thematic indicators combined with a tracking mechanism is a cornerstone in the integrity and sustainability of the national security screening program.

The Intelligence Collection, Analysis & Production (ICAP) Division has responsibility for developing and maintaining thematic indicators and country profiles for the national security screening program. ICAP has established a priority list and has begun developing the initial thematic indicators and country profiles.

Management action plan	Completion date
Establish a process to identify the demonstrable change expected from the thematic indicators.	June 30, 2021
Collaboration with IRCC to build indicator numbering and tracking functionality in GCMS continues. Presently IRCC advises the probable earliest deployment in GCMS would be in Q2-Q3 2022 to 2023.	December 31, 2022

Management action plan	Completion date
IRCC, the Canadian Security Intelligence Service (CSIS), NSSD and ICAP will collaborate in the quality assurance mechanisms to determine the effectiveness of indicators. This will be dependent upon (1) regular publication of thematic indicators by ICAP, (2) implementation of thematic indicator numbering and tracking across all IRCC networks, and (3) sufficient number of cases to be referred to accurately assess the specific indicator's effectiveness.	March 31, 2024

Recommendation 4

4. The VP of I&E should engage in systematic outreach and communication activities with CBSA regional hearings and investigations units to increase mutual understanding of the HQ and regional roles and responsibilities in the front-end security screening (FESS) process, with a view to minimizing duplication and enhancing collaboration. This could include:

- a. establishing a working group at the managerial level to regularly exchange information on new trends and events of concern within countries, regions and globally, as well as best practices, lessons learned and challenges in screening claimants and in preparing well-documented cases for Immigration and Refugees Board (IRB) hearings
- b. establishing a mechanism through which NSSD analysts and regional officers have access to relevant intelligence (such as via

subscription databases), and systematically share intelligence obtained (such as emerging trends seen with claimants from a specific country, or information shared by local police services) to enhance each other's work

- c. enhancing communication, to raise awareness of NSSD's processes and procedures, including the procedures to follow when regions need to ask NSSD for more time before a referral is closed and IRB is notified about the completed screening

Management response

The VP of I&E agrees with the recommendation and commits to continuing to strengthen its existing relationships with CBSA regional colleagues across Canada. The NSSD has determined that capitalising on existing Manager/working-level groups to be the most effective mechanism for collaboration, as the regions are directly represented or represented by their HQ counterparts at these forums.

Management action plan	Completion date
The NSSD will actively highlight opportunities for collaboration through the Operational Issues Working Group (IRB-IRCC-CBSA), the Asylum Business Integration Group (IRB-IRCC-CBSA), the Integrated Claims and Assessment Centre (ICAC) Design and Implementation Working Group (IRB-IRCC-CBSA-CSIS) and the Taskforce for Less Complex Claims (IRB-CBSA-IRCC). This will also include exploring opportunities for collaboration with the new Refugee Unit within IEB in order to ensure coordination with the regions.	September 29, 2021

Management action plan	Completion date
<p>Through the Immigration Investigations and Hearings program management tables, the NSSD and Inland Enforcement will ensure integration by establishing a consultative committee of NSSD Advisors, Hearings Officers, Hearings Advisors and inland enforcement officers (IEOs) involved in immigration investigations to improve understanding of processes and to identify opportunities for program efficiencies and coordination with the Regions. The NSSD will also be invited to participate at the Director level Inland Enforcement Program Management meeting.</p>	<p>May 5, 2021</p>
<p>The NSSD will appoint an FB-06 resource to serve as a centralized point of contact for FESS related matters, including as a subject matter expert for regional liaison and representation at meetings.</p>	<p>March 8, 2021</p>
<p>NSSD and Inland Enforcement Division will develop a strategy for better information sharing of information and case law on serious inadmissibility cases including evidence that has been collected and sourced for NSSDs inadmissibility assessments and for use in preparing and presenting section 44 reports or refugee interventions in the Regions.</p>	<p>July 9, 2021</p>
<p>The Enforcement Directorate will initiate consultations with key IEB stakeholders, proposing the acquisition of a CBSA enterprise license to products such as JANES, a key intelligence database subscription that both HQ and the regions would benefit from.</p>	<p>September 30, 2021</p>

Recommendation 5

5. The VP of I&E should advocate to address a number of key interdepartmental issues through the fora referenced in the trilateral Memoranda of Understanding (MoU), including:

- a. the roles and responsibilities in performance measurement across the continuum
- b. the need for interdepartmental training
- c. adopting a whole-of-government approach to setting service standards, taking into account of inter-dependencies in service delivery
- d. the development and implementation, by IRCC, of a monitoring mechanism to determine whether all applicants who should be referred for screening are being referred

Management response

The VP of I&E agrees with the recommendation. The MoU has been finalized and only requires ADM-level signatures from CBSA, CSIS, and IRCC.

Service standards are not included in the MoU, as transformative initiatives such as Robotic Process Automation and the Security Screening Automation (SSA) project are expected to have a significant positive effect on CBSA's ability to consistently meet service standards, even during surge times. Future consideration will be given to adding service standards as a separate annex once transformative measures such as thematic indicator tracking and SSA are implemented and a whole-of-government strategy on service standards has been jointly developed and approved by CBSA, CSIS, and IRCC. The lead on a service

standards strategy would be IRCC as Citizenship screening service standards would also be included and CBSA is not involved in that activity.

There is no existing mechanism for IRCC to determine whether all applicants who should be referred for screening are being referred. This is a major undertaking which has not yet been identified to IRCC at this time, so it does not appear in the MoU. This initiative would be dependent upon implementation of thematic indicator tracking and would be an IRCC responsibility. Future consideration will be given to adding this as a separate annex once thematic indicator tracking is implemented in GCMS and a process for carrying out this work has been developed and implemented by IRCC.

Management action plan	Completion date
Interdepartmental training, a whole-of-government approach to setting service standards, and performance measurement across the continuum will be tabled and addressed through existing governance fora for the program in a progressive manner, commencing first with Tri-lateral Director Management meetings, before ending at the Permanent Body of Senior Officials.	February 11, 2022
CBSA will advocate IRCC to consider implementing a mechanism to determine whether all applicants who should be referred for screening are being referred.	May 19, 2021

Recommendation 6

6. The VP of I&E should ensure that NSSD analysts have reliable and up-to-date information on country- and region-specific concerns and that all GeoDesks and teams apply policies, procedures and processes consistently. This includes:

- a. conducting an internal exercise to map current security screening practices in each GeoDesk and teams within GeoDesks, and assessing whether improvements have been made in implementing a harmonized approach to security screening across NSSD
- b. introducing a standardized approach to collecting, storing and updating information on countries' social, political, economic changes, and to communicating such changes to analysts across GeoDesks in a timely manner

Management response

The VP of I&E agrees with this recommendation. The NSSD will review current procedures and assess where improvement can be made, and will leverage existing tools and develop new mechanism to collect, store and update information related to national security screening.

NSSD performs quality assurance to ensure analysts are following policies, procedures and processes. The NSSD holds regular meetings between supervisors from all GeoDesks to discuss practices.

Recurring/systematic sharing of relevant intelligence products occurs across GeoDesks on a regular and ad hoc basis, including on regular and secret networks.

Management action plan	Completion date
NSSD will update its Standard Operating Procedures in consultation with all GeoDesks.	December 30, 2021
The NSSD will pilot basic and advanced functionalities of Apollo to collect, store and update country specific information to facilitate centralised storage of information.	September 30, 2021
The Intelligence Collection, Analysis and Production Division (ICAP) has completed its first priority setting exercise and has identified 30 countries as the first tranche to be developed/updated.	March 31, 2023

Recommendation 7

7. The VP of I&E, in collaboration with the VP of ISTB, should develop a plan to:

- a. assess program priorities and, accordingly, make adjustments to Secure Tracking System (STS) and the future replacement system (Security Referral Request Service), to start collecting additional data to support performance measurement
- b. ensure that SSA is fully operational with all its advanced functionalities, including the text-query reading capability before retiring STS; this is in view of mitigating major risks associated with the transition to the new system

Management response

The VP of I&E and ISTB Branches agree with these recommendations.

Changes that can be made to STS to support performance measurement using existing data received from GCSM and collected by NSSD have been requested. Additional data required to support performance measurement is not being transmitted from GCMS; in order to receive the data, IRCC needs to change the information stored in GCMS and transmitted to STS.

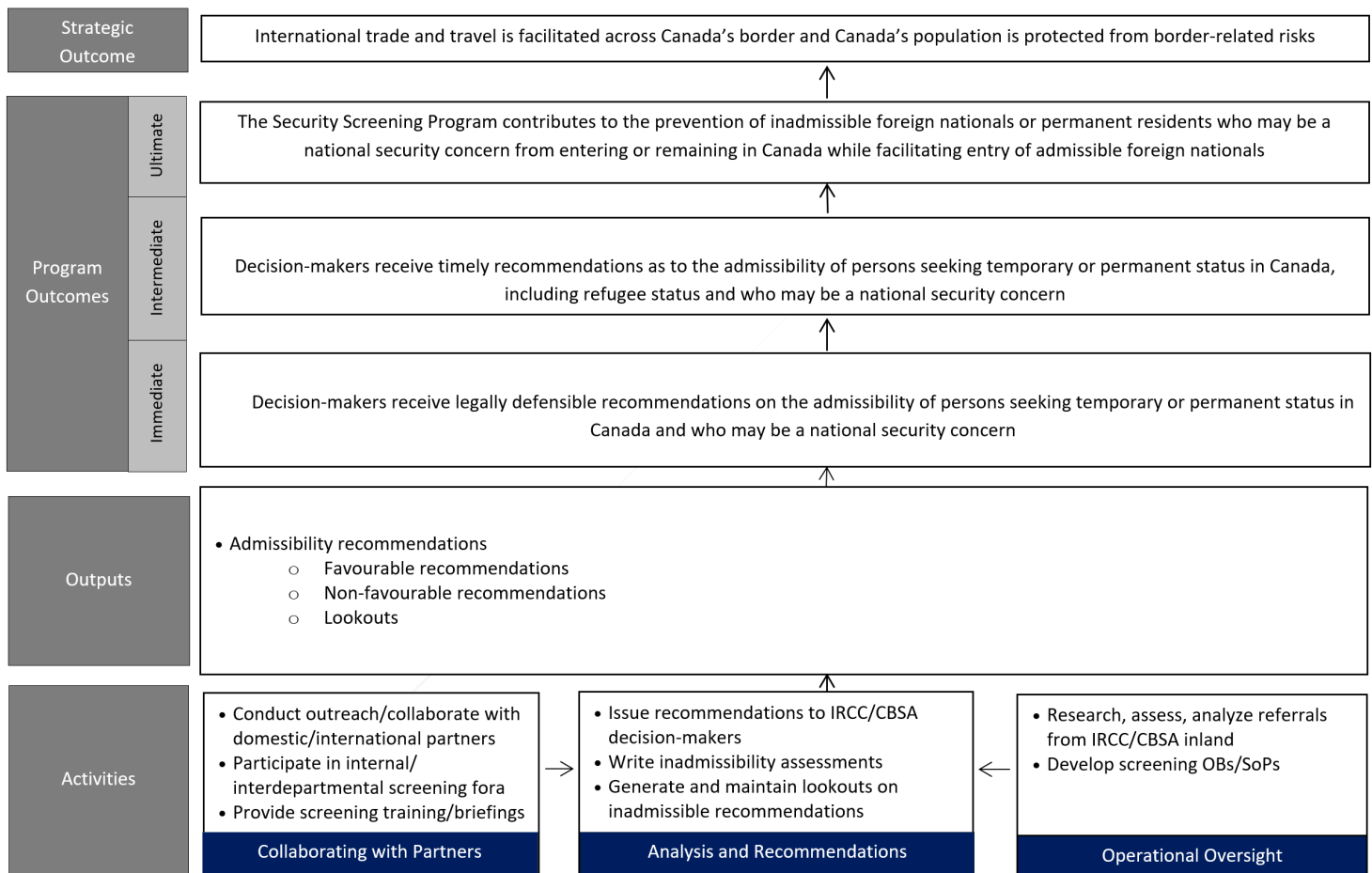
STS will remain as a repository of legacy files, cases, and documents. A new case management system to replace STS for processing national security screening cases will be implemented while the automated functionalities of SSA are being developed, tested, and approved.

Management action plan	Completion date
Request new elements in existing data fields of STS to capture national security screening steps.	Request completed, implementation scheduled June 30, 2021 by ISTB
Ensure the additional data fields to be transmitted from GCMS are included in the SSA business requirements.	May 31, 2021
Implement a new case management system for national security screening cases that incorporates advanced functionalities, and the ability to track sub-tasks and sub-processes of the national security screening continuum.	October 31, 2023

Management action plan	Completion date
Embed a quality control function in the new case management system to allow NSSD officers to confirm if SSA returned the correct assessment before its full implementation, which includes evaluating if the text-query reading capability is working as expected.	November 30, 2024

Appendix B: Immigration National Security Screening logic model

Appendix B: INSS logic model



LM version: June, 2019

► Text version: Immigration National Security Screening logic model

Additional observations on the Immigration National Security Screening Program's logic model

From a review of key performance measurement documents, the evaluation team identified opportunities for improvement with regards to some elements of the Program's logic model. Specifically, the logic model's immediate and intermediate outcomes are imprecise, as they mostly measure the quality of security screening recommendations, and not what the issuing of the recommendations is supposed to achieve.

A security screening recommendation, in itself, is an output listed in the logic model. A recommendation is issued within a certain time period, and with a certain rigour of research and consideration of legal precedent. As such, the immediate outcome should capture what the program expects will result from the issuance of timely and legally defensible recommendations. Similarly, the intermediate outcome should capture what the program expects will result from achieving the immediate outcome. For example, the immediate outcome could refer to decision-makers being able to make informed decisions on applicants' inadmissibility, while the intermediate outcome could address the legal defensibility of decisions based on NSSD's admissibility recommendations.

As in any real-world program or intervention, the Program only has full control over its own activities and outputs, as higher-level outcomes are influenced by external factors. However, NSSD is in a favourable position to influence the achievement of the Program's broader outcomes. For example, the Division and the IRCC benefit from an established process for resolving potential disagreements between the two departments, which impacts the achievement of higher-level objectives. As well, both NSSD and

the CBSA regions process RC applications, which indicates an opportunity for an Agency-wide approach to performance measurement in this specific area. The close collaboration with IRCC and the shared mandate with CBSA regions should also facilitate NSSD's ability to collect the necessary data to be able to report on outcomes related to these partners and to objectively assess the NSSD's contribution therein.

Appendix C: Evaluation methodology and data limitations

The Security Screening Program has an approved logic model (see [Appendix B: Immigration National Security Screening Logic Model](#)), logic model narrative, and a performance measurement framework. The logic model was updated in June 2019. The Canada Border Services Agency (CBSA) Program Evaluation Division (PED) consulted these performance measurement tools during the development of the evaluation project scope and for the development of the evaluation plan.

The evaluation plan, which included the purpose, scope, and methodological approach for the evaluation, was developed in consultation with the Evaluation Advisory Committee. The Committee was comprised of Director Generals from key CBSA Branches as well as one Regional Director General. The evaluation plan also delineated the use of the CBSA's subject matter experts to support the evaluation team throughout the development of evaluation questions, data collection and analysis. This group of SMEs formed the Office of Primary Interest (OPI) and the Office of Secondary Interest (OSI) networks. Regular contact with OPI members, especially from the CBSA's Intelligence and Enforcement Branch, was essential to develop a good understanding of the program's activities and history.

Evaluation questions

The evaluation questions were outlined in an evaluation matrix, with corresponding sub-questions of interest, evaluation indicators, and data collection methods used. The following evaluation questions aimed at assessing the achievement of expected outcomes (effectiveness) and at demonstrating efficiency.

Achievement of expected outcomes:

- To what extent do decision-makers receive timely and legally defensible admissibility recommendations from the CBSA?
- To what extent has the Program contributed to preventing inadmissible foreign nationals who may be a national security concern from entering or remaining in Canada?
- How has the security screening process been experienced by diverse groups of applicants?

Demonstrating efficiency:

- To what extent are the necessary internal policies, processes and resources in place to support implementation of the program?
- To what extent have the interconnections between the CBSA and program partners (IRCC, CSIS) supported or inhibited program integrity and the ability of the Agency to achieve intended program outcomes (e.g., clarity and appropriateness of roles and responsibilities, effectiveness and efficiency of protocols, information sharing and system interoperability)?
- To what extent are program processes efficient and optimize the use of resources?

Data collection methods/sources

Multiple data collection methods and sources were used to address the evaluation questions, including:

- Document review
- CBSA financial and human resources data
- CBSA case management systems data (data on referrals)
- IRCC case management system reports (data on applications and IRCC decisions)
- Semi-structured interviews with stakeholders from CBSA, IRCC, CSIS, and IRB and
- Surveys with NSSD analysts and IRCC officers

The evidence that was collected based on the above-mentioned methods and sources was compiled and analyzed as a whole. The common themes that emerged from multiple lines of evidence contributed to the development of preliminary evaluation findings. These findings, alongside the evidence that informed them, were presented to the OPI/OSI networks and the Evaluation Advisory Committee for review and input. The feedback from these consultations was incorporated, where relevant, into the final evaluation report and recommendations.

Document review

Document review took place throughout the evaluation project, from the planning to the examination phases. It was used to inform the evaluation scope, plan, and questions. Over 60 documents were reviewed, including CBSA internal program operational guidance, program performance reports, records of discussion from program oversight committee meetings, past evaluations and audits completed, security screening

indicators, and MoUs between security screening program partners. Documents were reviewed systematically and, where appropriate, evidence was compiled and used to inform and address the evaluation questions.

Financial and human resources data

The CBSA PED collected and analyzed financial and human resources data to assess how the CBSA allocated resources towards Security Screening Program activities. The financial data was gathered through NSSD Reports, Cost Centre Hourly Reports, an Activity Monitoring Report, and a Salary History Report. The human resources data was collected through Timesheet reports, Overtime reports, and a Staff Movement Report. The analysis focused on assessing trends in the use of resources towards Security Screening Program activities each month, from April 2014 to March 2019.

Case management data

Case management data tracks the processing of applications throughout the security screening continuum and eventual enforcement actions. Considering the period scoped for this evaluation (2014 to 2015 to 2018 to 2019), the CBSA PED collected data reports from IRCC on all received permanent residence (PR) and temporary residence (TR) applications (reports from IRCC's Global Case Management System) and accessed data on all PR, TR, and RC applications referred to by the NSSD (data extracted from CBSA's Secure Tracking System, with the support of the CBSA's Information, Science and Technology Branch). Also, the CBSA PED analyzed data reports on applicants subjected to enforcement actions (reports extracted from the CBSA's National Case Management System). The analysis of case management data focused on identifying:

- Patterns of processing times across application types (PR, TR, RC)

- Patterns of recommendation types issued to different groups of applicants – based on gender, country of birth, and age group
- Patterns of removals and detentions of applicants that received different recommendation types from NSSD and
- Alignment between IRCC decisions on applications and NSSD's recommendations issued

Semi-structured interviews with Government of Canada stakeholders

Interviews were conducted in-person or via teleconference with 46 key program representatives from the CBSA (HQ and Regions), IRCC, CSIS, and the Department of Justice Canada (JUS) (see Table 4). Some of the interviews were conducted with more than one stakeholder at a time, specifically if stakeholders held similar positions and responsibilities within an organization.

Table 4. Number of stakeholders interviewed, by stakeholder group

Stakeholder group	Number of stakeholders interviewed
CBSA program representatives (Headquarters)	18
CBSA regional personnel	5
IRCC	11
CSIS	9
Department of Justice	3

In advance of the interviews, stakeholders received semi-structured interview guides with an outline of key issues and questions for discussion. The topics discussed during interviews varied based on the participant's position (e.g. Director, Manager, Program Officer) and nature of engagement with the Security Screening Program (e.g. delivering the Program, supporting NSSD in specific areas etc.). Most interviews took place between January and March 2020 and were conducted in-person. Consultations with CBSA regional representatives were carried out via teleconference between March and August 2020. For all interviews, at least one evaluation team member took notes of interviewees' responses and reflections.

The interview data was content analyzed by identifying common themes emerging from interviews. Results from this content analysis were discussed amongst evaluation team members to ensure that the data was interpreted in a consistent and accurate manner.

Surveys

Survey of NSSD Analysts

An online survey was administered to NSSD analysts from March 23, 2020 to April 6, 2020. The goal of this survey was to better understand the experiences of analysts while conducting screenings of PR, TR, and RC referrals, communicating and collaborating with counterparts at IRCC and CSIS. The survey was sent to analysts employed at NSSD at the time of the survey at FB-02 to FB-06 positions. Responses were received from 66 NSSD analysts, representing a 57% response rate. The structure and design of the survey ensured that respondents answered only those questions that were relevant to their roles, responsibilities, and levels of engagement with Program activities. For example, some questions were only asked of respondents that had previously issued an "inconclusive" screening result.

Survey of IRCC immigration officers based in overseas missions

An online survey was also administered to IRCC officers from August 17, 2020 to September 14, 2020. The survey was designed by the CBSA and programmed and administered with the support of the Evaluation and Performance Measurement group at IRCC. The survey was originally scheduled for March 2020 but had to be delayed because the work arrangements of the target population were heavily impacted by the COVID-19 pandemic. The goal of this survey was to better understand the views and experiences of IRCC officers when screening, referring, and making decisions on the admissibility of applicants. The survey was distributed to 284 IRCC officers in overseas missions around the world. Responses were received from 130 IRCC officers, representing a 46% response rate. Similar to the survey implemented with NSSD analysts, the structure of the survey ensured that respondents answered only those questions that were relevant to their roles and responsibilities. For example, some questions were only asked of respondents that screen applicants from countries for which the Program had developed the new thematic indicator packages (see [Quality and quantity of referrals](#)).

Key limitations, challenges and mitigation strategies

The evaluation timeline and data collection activities were impacted by significant delays in obtaining CBSA case management data. In addition, the COVID-19 pandemic caused the IRCC survey to be delayed and meant that IRCC officers at in-Canada Case Processing Centres (CPCs) were not able to be surveyed. During the analytical phase, the evaluation team faced challenges in terms of having the required computer power to process and analyze the large case management datasets. The timeline of the evaluation was extended to account for these delays, and to ensure that the necessary data could be collected and properly processed.

Appendix D: NSSD's service standards

Service standards are outlined in NSSD's internal guidance document referred to as "Standard Operating Procedures." ⁶¹ The service standards vary depending on the type of application being assessed (PR, TR, or RC), the urgency or purpose of the application (e.g., VIP application, electronic travel authorization), and on the location (by IRCC mission) where the application was submitted. Table 5 presents the service standards that were in effect from 2014 to 2015 to 2018 to 2019 for TR, PR, and RC referrals respectively.

Table 5. Service standards for processing TR, PR and RC applications (2014 to 2015 to 2018 to 2019)

Service standard	Type of case / country (mission)
Temporary resident applications	
2 business days	Very important persons (VIPs)
	Urgent cases
5 business days	China (Beijing; Guangzhou; Hong Kong; Shanghai)

Service standard	Type of case / country (mission)
10 business days (also referred to as tier 1 missions)	Pre-diplomatic cases
	Haiti (Port-au-Prince)
	India (Bangalore; Chandigarh; New Delhi)
	Lebanon (Beirut)
	Pakistan (Islamabad)
	Russia (Moscow)
	Saudi Arabia (Riyadh)
20 business days (also referred to as tier 2 missions)	All other missions
	Electronic travel authorization
Permanent resident applications	
2 business days	Urgent cases
110 calendar days	Cases referred and closed at Stage 2 (Assessment)
Refugee claims	
25 calendar days	Claimants from Designated Countries of Origin (DCO)
55 calendar days	Claimants from any country, other than DCO

Source: PED, in consultation with NSSD subject-matter experts.

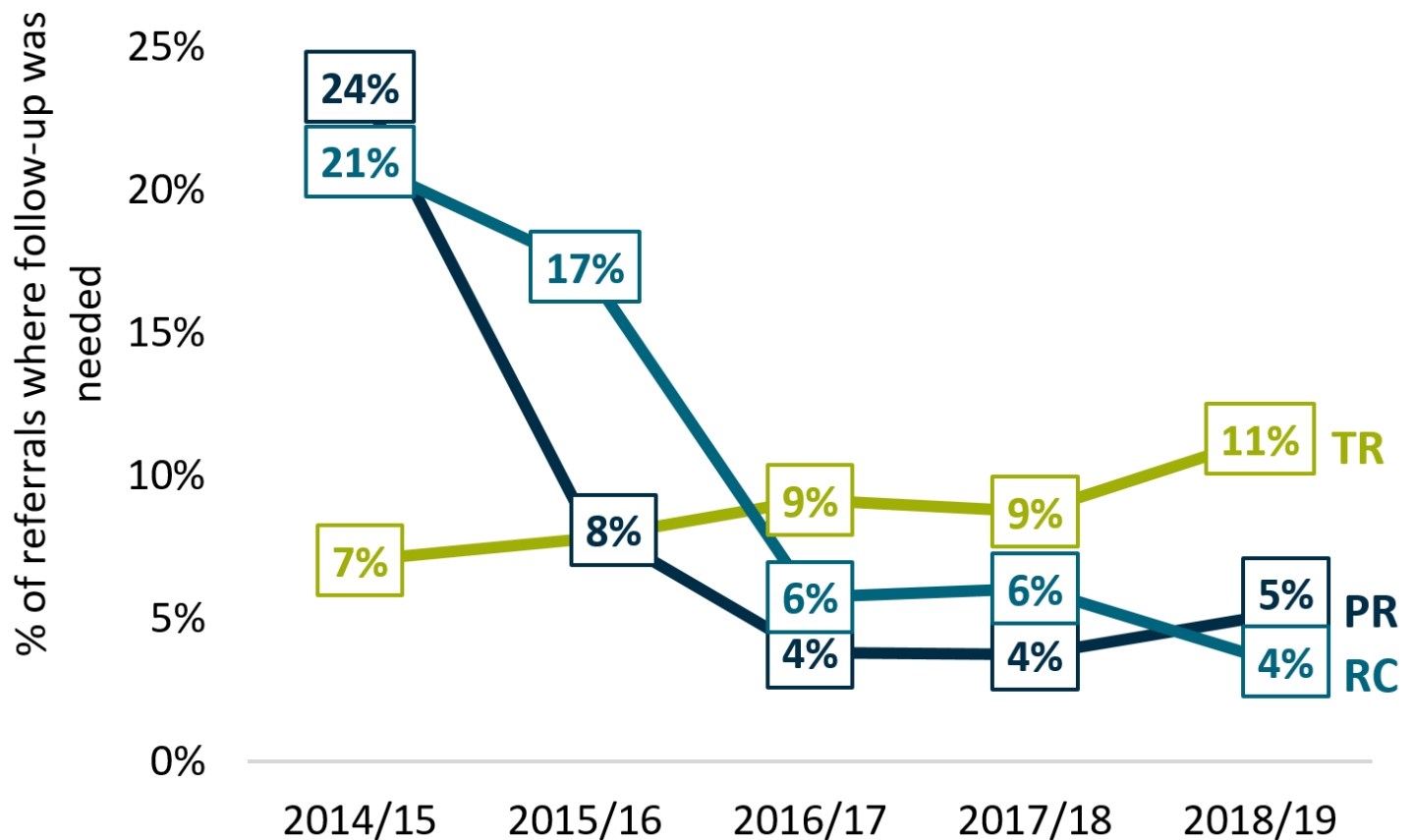
NSSD aims to process 80% of applications in each category within the established service standard for any given month ⁶². The remaining 20% are reserved for referrals that take longer time to process due to their complexity and/or interdependencies with other partners.

Appendix E: Trends in incomplete referrals

For referrals that do not contain all the information required to conduct a comprehensive screening, the NSSD reaches out to the office that made the referral to obtain the required information. The referring office could be an IRCC mission overseas or in Canada, or a CBSA region processing a refugee claim. NSSD needs to wait for a response, which generally requires the referring office to contact the applicant/claimant; this inevitably causes a delay in processing the referral.

During the evaluation period, the proportion of referrals that lacked all the required information declined steeply for PR and RC, but saw a modest increase for the TR business line (see Figure 23). This suggests the information requirements for PR and RC were streamlined and/or efforts were made to communicate the requirements to IRCC offices and CBSA regions ⁶³.

Figure 23: The proportion of incomplete PR and RC referrals plummeted over the evaluation period



Source: Compiled by the evaluation team using STS data

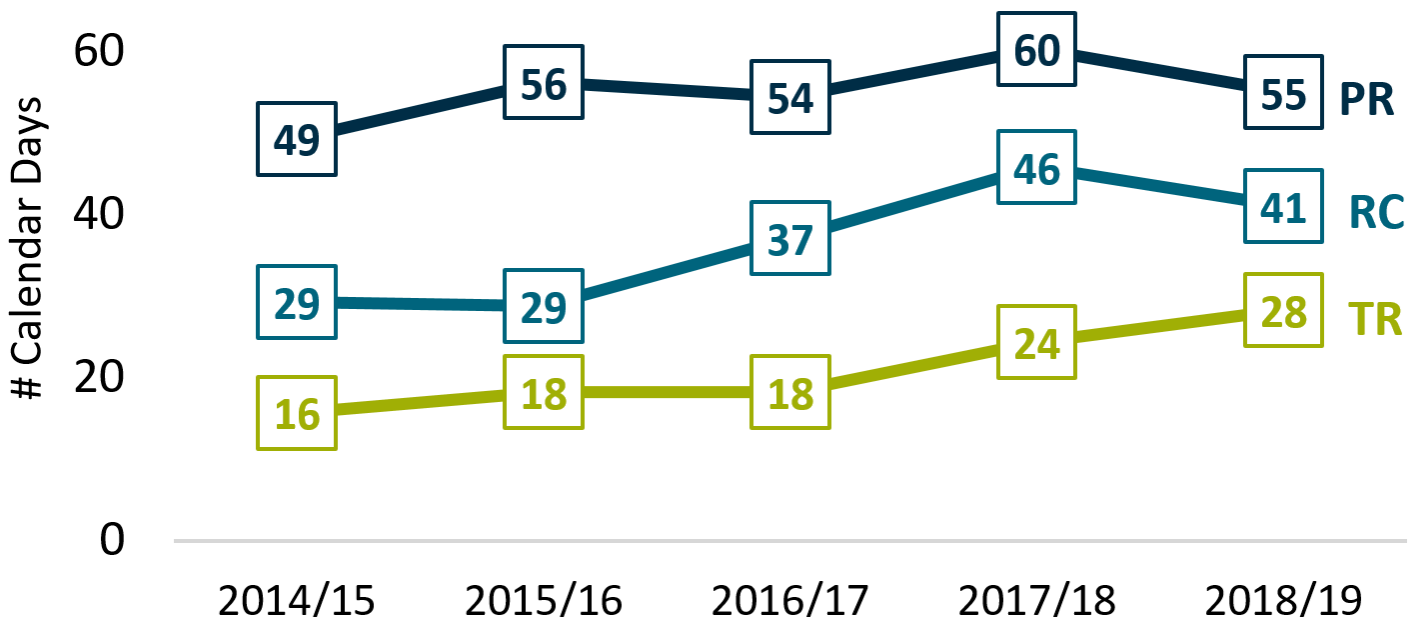
► Text version: Figure 23

Source: Compiled by the evaluation team using STS data

A number of IRCC missions and CBSA regions had a significant proportion of referrals that lacked the required information for the NSSD to complete the screening. While most IRCC missions sent complete referrals, one quarter (26%) of Chandigarh's referrals were incomplete, as were 18%-19% of referrals from Guangzhou and Ho Chi Minh missions. Among CBSA regions, 16% of GTA's were incomplete, as were 13% of those submitted by the Southern Ontario Region.

The average number of days that NSSD waited for partners to provide missing information grew across all three business lines over the evaluation period. Waiting times were about 1-2 weeks longer in 2018 to 2019 than they had been in 2014 to 2015, although were on a downward trend for PR and RC referrals at the end of the evaluation period (see Figure 24).

Figure 24: The time taken to obtain information increased across all business lines



Source: Compiled by the evaluation team using STS data

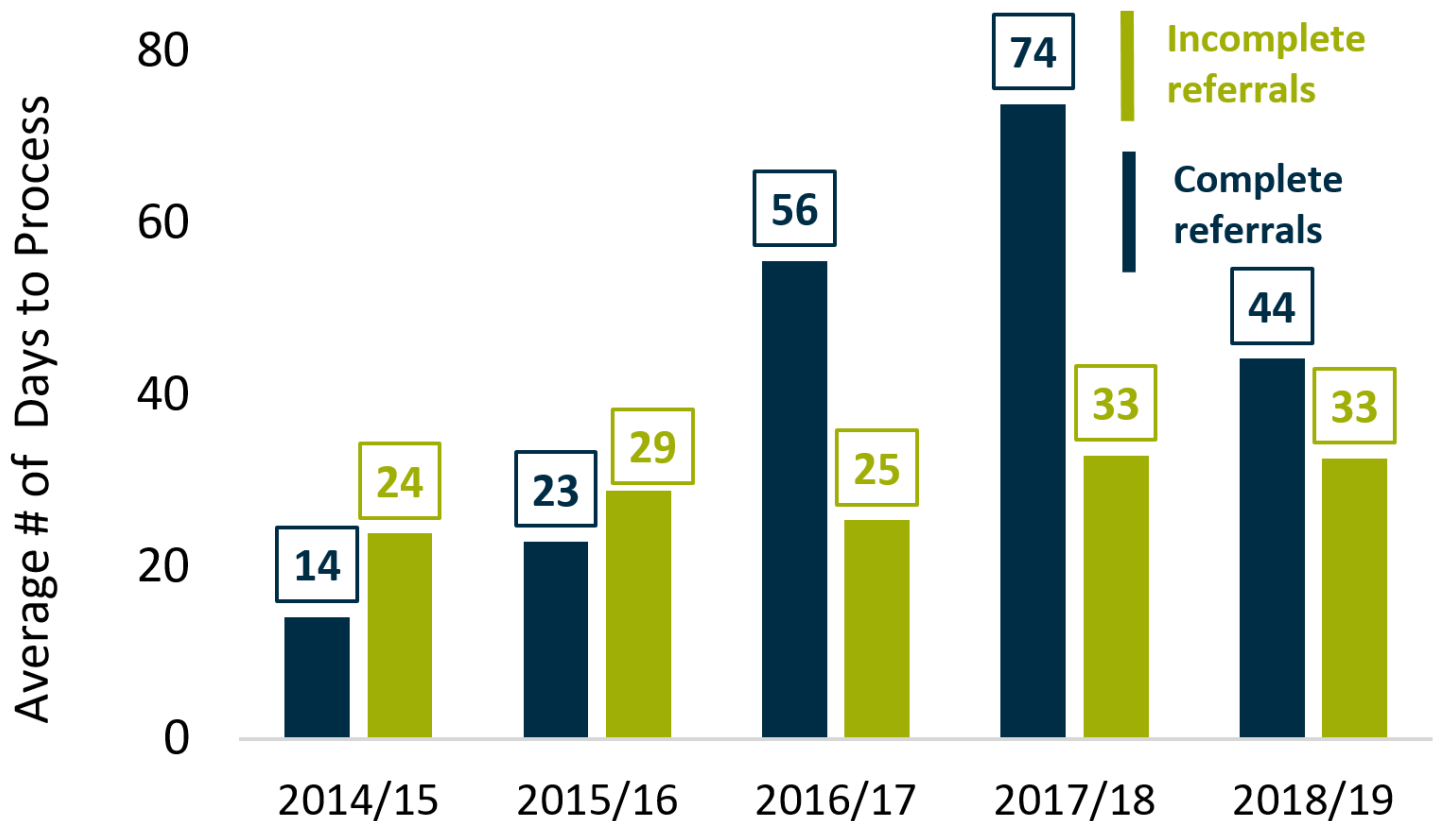
► Text version: Figure 24

Source: Compiled by the evaluation team using STS data

Data showed that incomplete referrals were processed faster than those received with all the required information. While incomplete referrals may extend the overall processing time, these referrals did not contribute to NSSD's backlog. In addition, when the backlog fell considerably in

2018 to 2019, the average processing time for complete referrals fell significantly, while average processing times for incomplete referrals remained stable compared to the previous year (see Figure 25).

Figure 25. After 2015–2016 (post-OSR), processing times were significantly longer for referrals that did not involve requests for missing information



Source: Compiled by the evaluation team using STS data

► Text version: Figure 25

Source: Compiled by the evaluation team using STS data

Appendix F: Inter-partner initiatives

Initiatives to develop and refine security screening indicators

Indicator review inter-departmental working group (IRIWG). Led by the CBSA, the IRIWG has brought together representatives of the CBSA, CSIS and IRCC, and also consulted with Global Affairs Canada. The working group sought both to develop and update [redacted] thematic indicator packages as well as to ensure [redacted] information in the *IC Manual – Chapter 2* and Indicator Packages were complete and up-to-date. Sixteen new thematic indicator packages were developed by the IRIWG in 2018 and 2019.

Pilot study to track the use of the new indicators. In 2019 to 2020, the CBSA and IRCC launched pilot projects to improve the tracking of the usage of security screening indicators by IRCC officers. The first small-scale pilot was followed by a larger one; however, it was interrupted by the COVID-19 pandemic. Once evaluated, the results will inform the development of an expanded, full-scale project to track how IRCC officers use security screening indicators in assessing every application (for more information, see Appendix F).

NSSD analysts advising IRCC officers in CPC-Ottawa. Historically, the CPC-Ottawa has generated large numbers of referrals to NSSD, but has a low percentage of non-favourable recommendations. Since 2018 to 2019, and with a view to improving the quality of referrals, the NSSD has been sending a couple of its analysts to the CPC-Ottawa on a regular basis, to work alongside IRCC case processing officers. Feedback has indicated that having direct access to NSSD analysts has assisted the CPC's case processing officers in correctly understanding and applying the security screening indicators in the initial assessment of applications.

Initiatives to measure the effectiveness of indicators and improved quality of referrals

NSSD alone or in collaboration with IRCC carried out several initiatives to assess the performance of the new thematic indicators. In 2019 to 2020, the NSSD assessed the impact of the first four thematic indicator packages on the Division's workload by comparing the number of referrals received from the respective IRCC missions and from one of the Case Processing Centres (CPC) in Canada. The goal of the initiative was to identify any new trends in numbers of referrals received from these missions and in the types of NSSD recommendations issued on these referrals. Similar to the quantitative analysis described above, NSSD compared the number of referrals for applicants **[redacted]** received in the one-year period before the launch of the indicator packages (August 2017 to July 2018) to the one-year period after (August 2018 to July 2019) ⁶⁴. However, this initiative did not consider the increasing numbers of applications seen by IRCC in that same period. The patterns varied across the four groups, meaning that no specific impact of the new indicator packages could be determined. Multiple factors may have contributed to the varied results of the trend analysis, including:

- New business line for the CPC located in Ottawa
- Suspension of one mandatory indicator **[redacted]** shortly before the implementation of the new thematic indicator package and
- End of Operation Syrian Refugee (OSR) family reunification applications

Regarding the type of NSSD recommendations issued on these referrals, there was an increase in the proportion of Non-Favourable recommendations for referrals **[redacted]** and from two missions with large numbers of applications that process applicants **[redacted]**. On the

other hand, the proportion of Non-Favourable recommendations decreased for TR referrals **[redacted]** and from two other missions with large numbers of applications that process applicants **[redacted]**.

Other, more targeted initiatives were carried out jointly by the CBSA and IRCC, and aimed at assessing the impact of security screening indicators on the quality of referrals:

1. In 2019 to 2020, the CBSA (Europe, Africa and Iran Geographic Desk) participated in a three-month project where IRCC officers were required to record into a notes field in GCMS which indicators led to their decision to refer applications to the NSSD. According to NSSD, the results from this assessment were shared and discussed with IRCC, leading to an increased quality of referrals. ⁶⁵ However, it was also noted that recording this information into an unstructured field in the system and conducting any follow-up analysis is labour intensive
2. An ongoing program initiative led by the IRCC and supported by the CBSA (NSSD) is working to develop, test, and implement a numbering system that will enable IRCC officers to systematically track and record security screening indicators that led to the referral of applications to NSSD and CSIS. ⁶⁶ The numbering system will be accompanied by a change to available GCMS fields, which will facilitate the entry of such data through a drop-down menu of the codes
3. In 2018 to 2019, the CBSA (Asia and Oceania Geographic Desk) completed a review of referrals received based on the first version (August 2018) of the thematic indicator package developed **[redacted]**. The NSSD's assessment of these referrals informed the development of a new version (January 2019) of the thematic indicator package **[redacted]**, designed to reduce the number of unnecessary referrals received from applicants **[redacted]** ⁶⁷

Overall, the initiatives carried out by the CBSA and IRCC do not provide a conclusive assessment of how effective the thematic indicators are. The pre-post analysis conducted by NSSD did not confirm any quantitative or qualitative patterns that could be clearly attributed to the introduction of the new indicators. The other initiatives, while modest in scope, allowed the NSSD to better understand how IRCC officers used the thematic indicators. This resulted in the update of one thematic indicator package [redacted] and in the revision and improvement of how referrals are identified in one specific IRCC Mission. The project that aims at tracking how thematic indicators impact referrals, once implemented, will allow for a more comprehensive assessment of the effectiveness of security screening indicators.

Initiatives to improve policies and procedures

NSSD engaged in several significant efforts to improve its policies and procedures:

Standard operating procedures (SOPs)

NSSD updated its SOPs as part of its backlog reduction efforts in 2018. These procedures provided detailed instructions on how to conduct screenings and specified the roles and responsibilities of the different staff involved

Business mapping report

In 2018, a trilateral business mapping exercise was conducted in which NSSD was heavily involved. A formal report resulted, along with recommendations; some of these were found feasible to implement while others were not

Backlog reduction and transformation action plan (BRTAP)

NSSD introduced a suite of policy and procedural adjustments in 2018 to 2019 (see [Backlog reduction and transformation action plan](#) for

more information) that served as the catalyst for reducing inventory and backlog in 2018 to 2019

Trilateral security screening diagnostic (TSSD)

In the midst of rising numbers of referrals and growing inventory and backlog in 2017 to 2018, NSSD, IRCC, and CSIS conducted the TSSD to identify inefficiencies in the security screening continuum and to propose solutions. The most notable of these were:

- Developing new thematic screening indicators (see Quality and quantity of referrals)
- Eliminating incomplete referrals from IRCC (referrals that do not contain all the required information to conduct the screening) ⁶⁸
- Allowing Non-Favourable recommendations to be valid indefinitely ⁶⁹

CBSA National Security Screening Business Enhancement Review (NSS BER)

In 2016, the CBSA Business Enhancement Initiative conducted a workflow review of Permanent Resident and Temporary Resident processes to identify program improvement opportunities. The NSS BER produced recommendations that, if implemented, would support NSSD in delivering screenings in a more efficient and effective manner. Some of the recommendations were implemented in the context of NSSD's BRTAP in 2018 to 2019.

Appendix G: Backlog reduction and transformation action plan measures enacted by April 2020

Collaboration

- Enhance communication between NSSD Managers and IRCC MPMs and CMB to build efficiencies, reduce the number of problem cases, and explore ceasing screening for approved national interest letters

- Revive the Indicator Working Group and review the risk indicators manual (IC2) with IRCC and security partners
- Collaborating with IRCC to reduce the number of duplicate referrals from missions (ex. Refer once for section 34 and refer again for section 35 or same in-ad concerns referred multiple times)
- Consult with United Kingdom, Australia and New Zealand on their screening processes to identify best practices
- Specific positions within NSSD (Manager, Senior Program Advisor, and Senior Program Officer) are included in the list of designated officials for the 2003 Statement of Mutual Understanding with the USA for Case-by-Case Immigration Information Sharing
- NSSD will post four analysts on a part-time basis to the CSIS Security Screening Branch (CSIS-led Fusion Centre)

HR/training

- Front-End Security Screening (FESS) assistance from the Border Operations Centre (BOC) and National Targeting Center (NTC) who will query applicants in Integrated Border Query (IBQ)
- Offer overtime to meet legislative requirements for FESS cases
- Overtime is extended to NTC and BOC employees
- Hired students through FSWEF for each desk in 2018
- Obtaining PCO training for NSSD analysts
- Implement a divisional “Mitigating the Impact of Exposure to Offensive and Horrific Material” protocol
- Review, update, and deliver NSSD lookout training for Border Operations Centre Staff

Policy or procedural change

- The NSSD will stop compiling specific risk assessments. Where CSIS information was used, the NSSD will receive the national interest letter, send CSIS the CA number, and forward the CSIS brief to IRCC with no cover note
- Reduce the level of approval required for low-risk briefs, such as those that are templated for known organisations (FB6 to FB4 with peer review)
- Streamline the screening process for refugee claimants from Haiti (low risk) by conducting screening before the BoC arrives
- Issue reminder of existing SOP regarding closing FESS cases as inconclusive when BoC not received within 60 days
- Stop reviewing paper FESS intake documents when all required information is available in GCMS
- Streamline security screening for Home-Maker applicants with no travel or employment history
- Streamline the screening process (not waiting for BoC) for refugee claimants from low risk countries, **[redacted]**
- Modernize NSSD Standard Operating Procedures
- Streamline refugee claimant security screening by not waiting for the basis of claim to arrive if all queries are negative and an No Reportable Trace has been received
- Extend the validity of NSSD non-favourable recommendations from 48 months (4 years) to life
- Closing as favourable PR referrals that have been designated as No Reportable Trace and the applicant had a favourable recommendation in the last 48 months for a TRV
- Streamline screening of low-risk asylum claimants by utilizing IBQ to screen s.34 referrals that have been designated as No Reportable Trace

by PILLAR

- Create fourth geographic desk (AMER) in NSSD
- Elimination of an artifact process that delayed closing certain referrals by 25 days
- Develop an NSSD surge capacity plan

Referral management

- Embed an NSSD employee in CPC-Ottawa on a part-time basis
- Pilot a sampling exercise on referrals from the top 5 volume missions every 6 months
- Provide training and guidance to IRCC on the application of indicators
- Remind missions of policy on student and homemaker visa applicants
- Implement a numbering system to allow quality assurance of indicators
- Provide “green phone” training to Beirut, Amman, Abu Dhabi, Ankara, and London to improve quality of referrals
- Provide training and guidance to improve quality of referrals from Tunis
- Analyze referrals of country of birth (COBs) in the first four thematic indicator packages during the 12 months before and 12 months after TI packages were published
- Make all non-thematic indicators, except lookouts, discretionary
- Provide training and guidance to IRCC in Missions Abroad on the application of indicators
- Work with IRCC to improve the quality of referrals from CPC-O

Review or modification of existing processes

- Analysis of security screening referrals from Ankara
- Analysis of “Inconclusive” Recommendations

- Analysis of “On Hold” referrals
- Backlog and Referral Analysis (October 1, 2018 – March 31, 2019)
- Review and update 48 month resubmission policy
- Analysis of Pending Pillar cases more than a year overdue

Use of technology / automation

- Pilot a WebEx training and assess if benefit to implement yearly training for the Missions that are generating a high level of referrals. Goal is to ensure that the NSSD receives quality referrals based on risks and inadmissibility
- Implement the use of IBQ to perform searches at the triage stage
- Use of IBQ Bulk Query to triage cases that have been designated as No Reportable Trace
- Pilot the use of Babel X software
- STS maintenance and upgrades
- Obtain ability to reset STS passwords for NSSD employees

Source: BRTAP (2018), measures grouped into categories by the evaluation team.

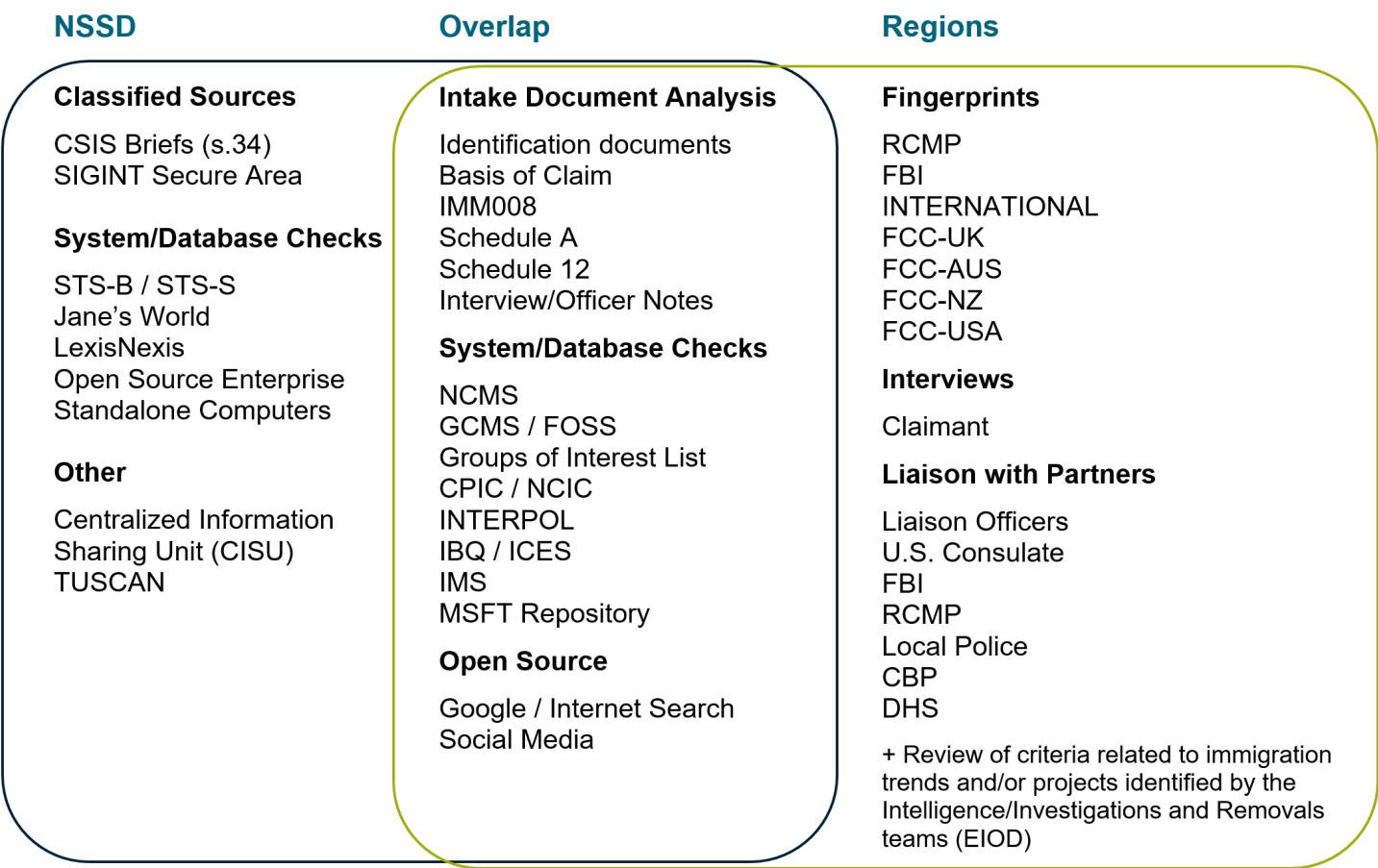
Note: Measures listed as In Progress, On Hold, or Discontinued are not included.

Appendix H: Unique and overlapping screening activities between NSSD and regions

An independent FESS Review conducted in 2017 identified screening tasks that are unique to both NSSD and CBSA regions and those that are conducted by both, i.e. where there is an overlap. The evaluation team

consulted the list with regional stakeholders and updated it (see Figure 26). However, it should be noted that some of this overlap may be justified or even required due to the time that in some cases passes between NSSD’s screening and the IRB hearing or for regional officers to determine if the case is strong enough to be pursued in front of IRB. ⁷⁰

Figure 26. There are numerous screening activities that are being conducted both by NSSD and CBSA regions.



Source: Adapted from Deloitte (2017). *In-Canada Refugee Claim Screening Process (FESS) Review*. Updated with information from stakeholder consultations.

► Text version: Figure 26

+ Review of criteria related to immigration trends and/or projects identified by the Intelligence/Investigations and Removals teams (EIOD)

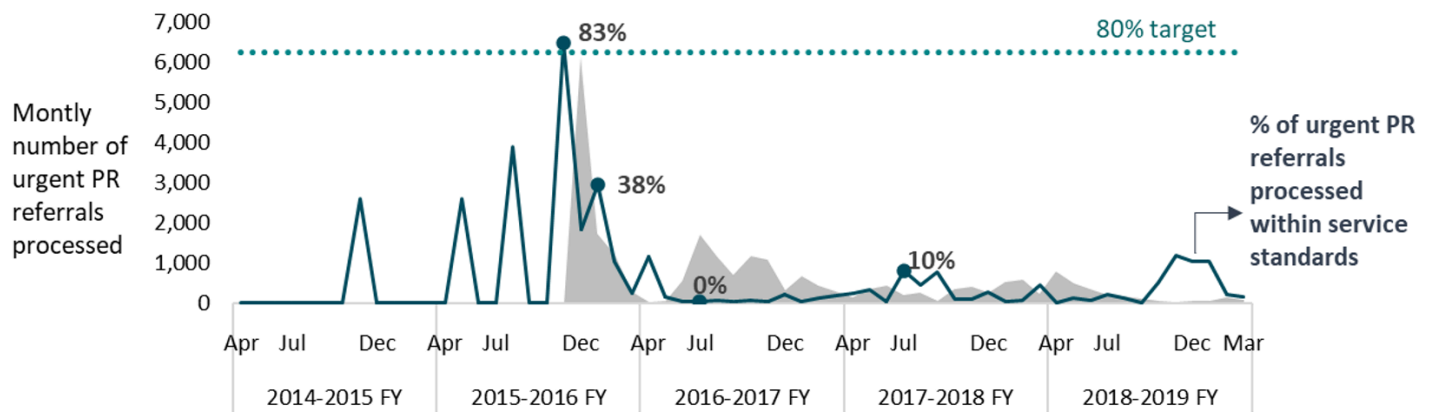
Source: Adapted from Deloitte (2017). *In-Canada Refugee Claim Screening Process (FESS) Review*. Updated with information from stakeholder consultations.

Appendix I: The impact of Operation Syrian Refugee and increased irregular migration on service standards and NSSD's response

OSR and IIM were undeniable major causes of NSSD's backlog seen during the evaluation period. In addition to the increased number of referrals through OSR, the mislabeling of most OSR referrals as urgent also played a role in how NSSD was managing the surge. The IIM, on the other hand, had a clear impact on the Division's ability to process RC referrals. NSSD responded by re-allocating staff from one business line to the other and relying on unlimited overtime by staff.

The impact of OSR PR referrals mislabelled as "urgent"

In total, 83% of OSR referrals received from November 2015 to February 2016 were in the urgent category. Key Program stakeholders indicated that PR referrals under OSR were frequently submitted as "urgent" (with a service standard of 48 hours) even at times when those referrals were not urgent.⁷¹ As this issue was known to the CBSA and CSIS, urgent PR referrals were mostly screened as "standard", typically with a service standard of 110 calendar days. However, the overuse of the "urgent" PR category made it challenging for the Program to adequately assess its performance in processing legitimately urgent referrals. As shown in Figure 27, NSSD rarely managed to meet its service standards performance target for urgent PR referrals during the evaluation period. Some interviewees suggested that the erroneous categorization of referrals as urgent continued in some missions post-OSR, which could help explain the Division's well-below target performance from December 2015 onwards.

Figure 27. Most of the urgent PR referrals were not processed within the service standards performance target

Source: Compiled by the evaluation team based on CBSA case management data (STS)

► Text version: Figure 27

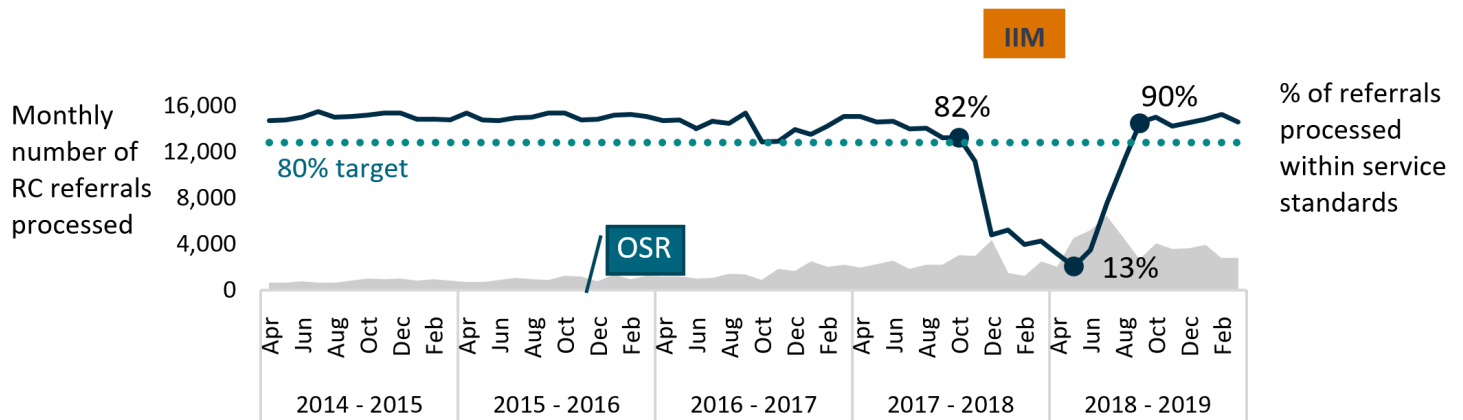
Source: Compiled by the evaluation team based on CBSA case management data (STS)

The impact of IIM on processing RC referrals

Note: Between July 2017 and March 2020, 55,677 irregular migrants at the Canada-U.S. border claimed refugee protection status in Canada. As per the FESS policy, all adult claimants were referred to NSSD for security screening. (Source: [IRB](#))

The processing of RC referrals (shown in Figure 28) was largely unaffected by OSR. During the evaluation period, NSSD met its 80% performance target for RC referrals until November 2017, when the Division started to face pressure stemming from IIM. NSSD was unable to screen the large numbers of irregular migrants then claiming asylum fast enough; by May 2018, the Division processed only 13% of RC referrals within service standards. However, NSSD was able to return to meeting its performance target by September 2018, less than a year after the initial impact of IIM and despite the fact that irregular migrants were continuing to arrive in significant numbers.

Figure 28. The NSSD's ability to process RC referrals within its service standards performance target was affected by IIM in late 2017 and early 2018



Source: Compiled by the evaluation team based on CBSA case management system data (STS).

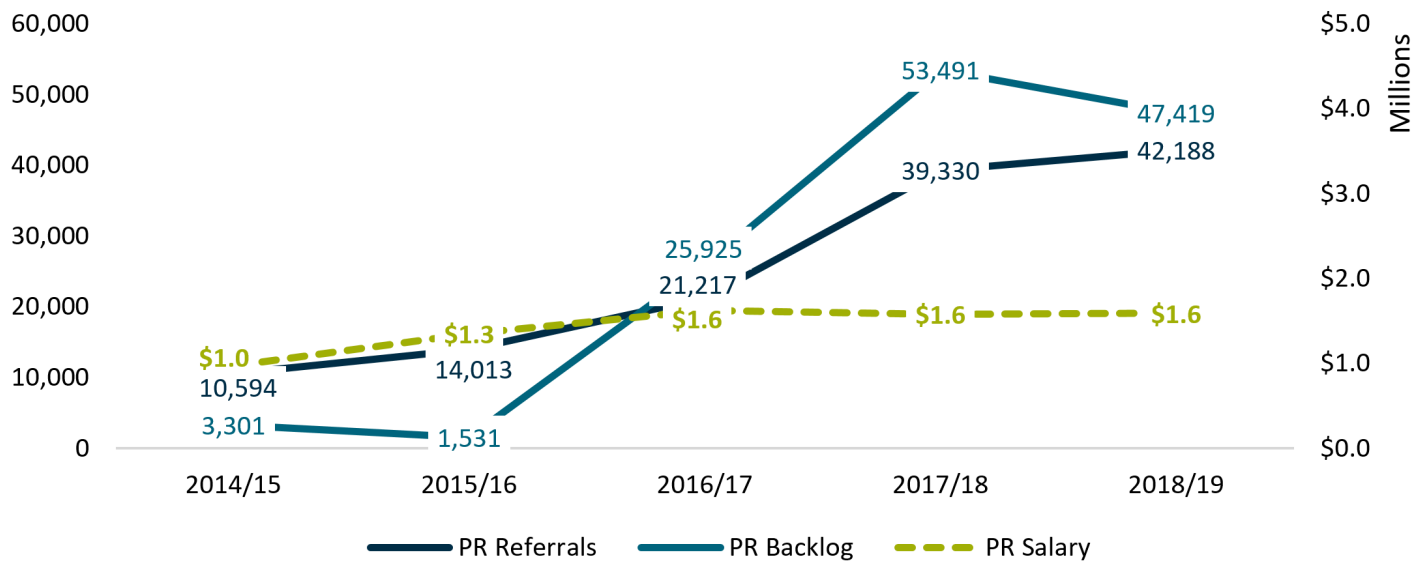
► Text version: Figure 28

Source: Compiled by the evaluation team based on CBSA case management system data (STS).

NSSD's response to the surges in referrals

In response to OSR, NSSD initially reallocated resources to processing PR applications. However, even as PR backlog continued to increase significantly after 2015 to 2016, the Division decreased PR salary expenditures between 2016 to 2017 and 2017 to 2018 (see Figure 29) as it started to face new challenges. This decrease of resources allocated to PR coincided with the sudden increase of refugee claims resulting from IIM. Essentially, NSSD did a further reallocation of staff to the RC business line, where the need was even more pressing.

Figure 29. OSR triggered a backlog buildup that accelerated through 2016–2017 and beyond. Comparatively modest increases in salary expenditures could not compensate for the additional workload



Source: Compiled by the evaluation team using STS and NSSD HR data.

Note: The percentage figures indicate the percentage change from the **previous fiscal year**, not the base year. For example, the 1,593% increase in backlog in 2016–2017 is the percentage increase from 2015–2016 backlog levels, not 2014–2015 levels.

► Text version: Figure 29

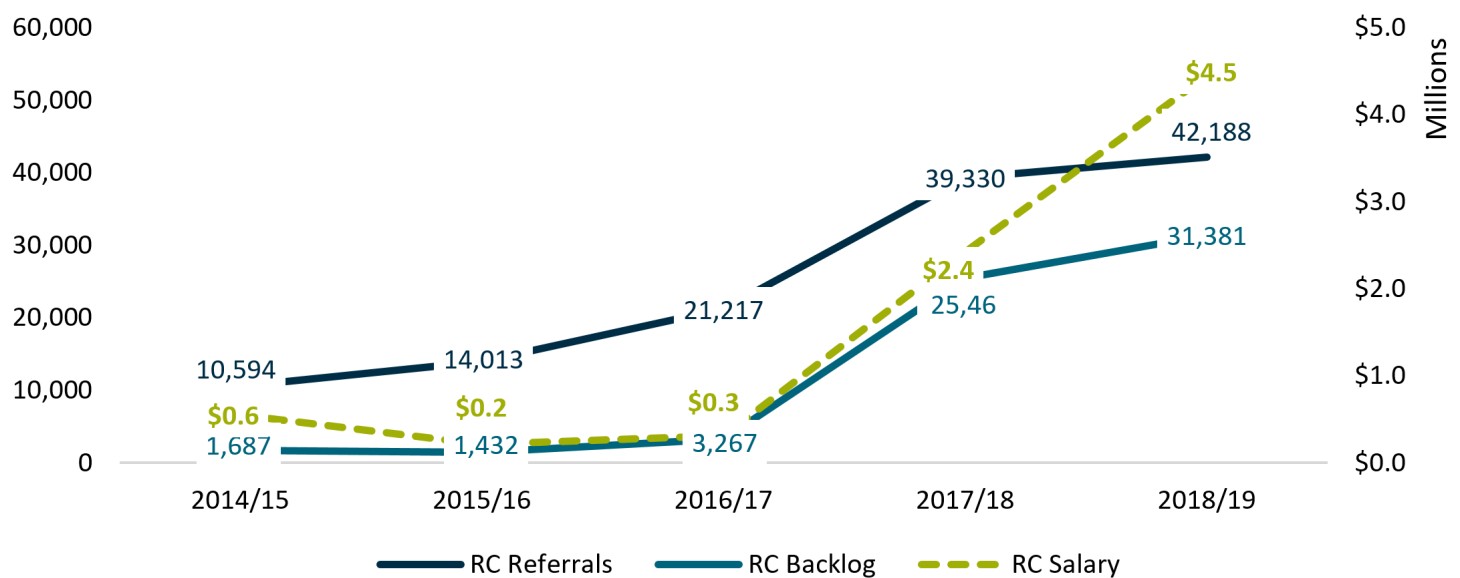
Source: Compiled by the evaluation team using STS and NSSD HR data.

Note: The percentage figures indicate the percentage change from the previous fiscal year, not the base year. For example, the 1,593% increase in backlog in 2016 to 2017 is the percentage increase from 2015 to 2016 backlog levels, not 2014 to 2015 levels.

NSSD responded to IIM proportionally to the increased workload resulting from the event. In 2017 to 2018, the proportional growth in RC salary expenditures almost exactly matched the proportional growth in the RC backlog; further salary expenditure increases followed in 2018 to 2019 (see Figure 30). NSSD’s response to IIM was driven by the pressure to process RC screenings within legislated timelines. By law, the IRB must hold a refugee hearing within a certain timeline, and requires a completed security screening to do so. If the screening is not processed on time, the IRB is required to reschedule the hearing, as was frequently the

case in 2017. ⁷² ⁷³ However, the IRB may also proceed with a hearing without a security screening being completed if NSSD has not provided one within 6 months, potentially granting protection to an inadmissible person. A further pressure, cited by NSSD stakeholders, were reports in the Media on the asylum program, particularly with regards to the large numbers of irregular migrants crossing at the Canada-U.S. Border. This includes reports highlighting the possibility of having refugee claimants living in Canada while awaiting their IRB hearing for months or even years, and potentially lacking a complete security screening. ⁷⁴ ⁷⁵ As such, the processing of refugee claims has been prioritized by the NSSD.

Figure 30. In response to the backlog in RC referrals that accumulated following IIM, NSSD increased RC salary expenditures proportionally, and succeeded in greatly reducing the backlog by 2018–2019



Source: Compiled by the evaluation team using STS and NSSD HR data.

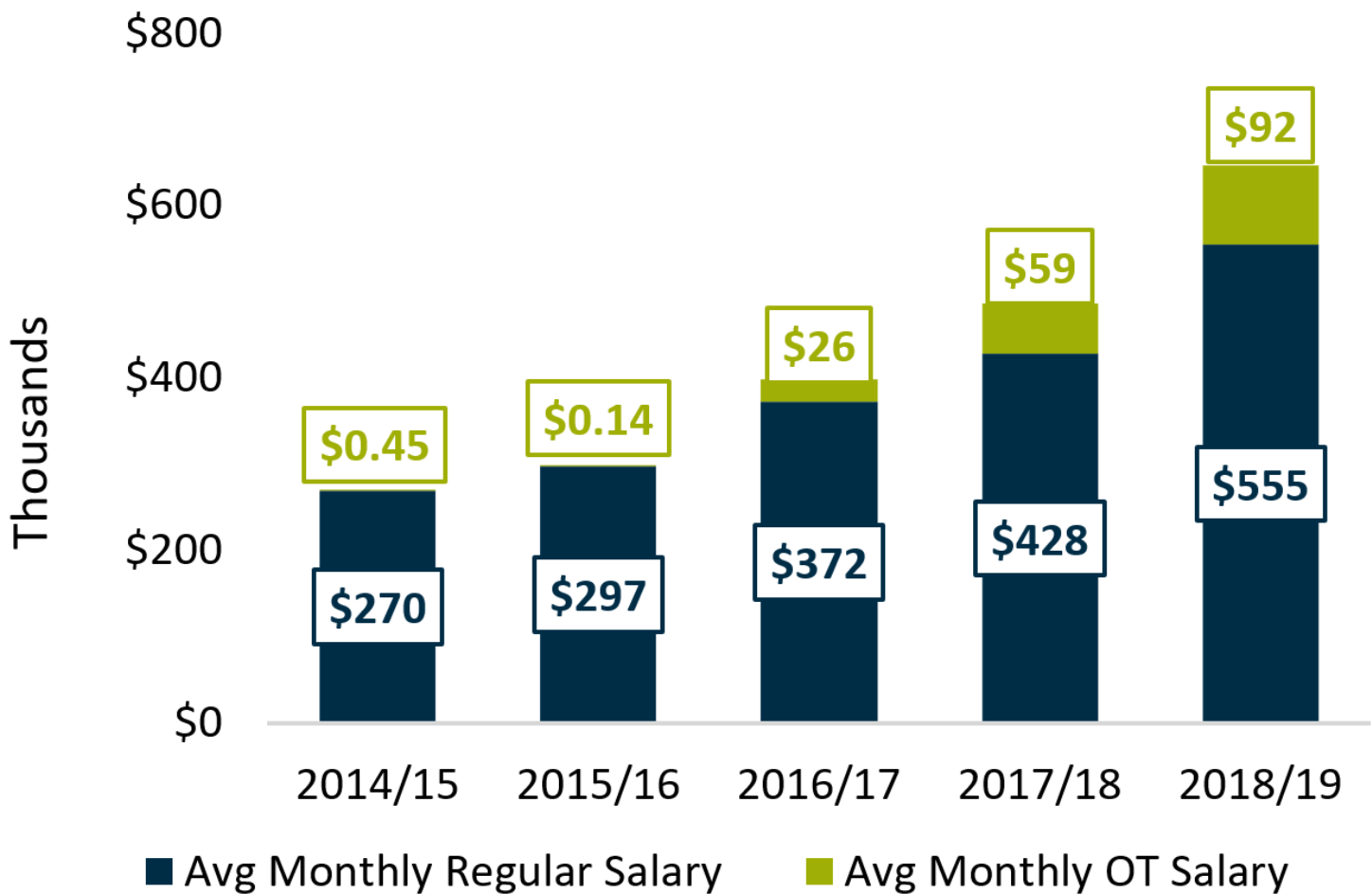
► Text version: Figure 30

Source: Compiled by the evaluation team using STS and NSSD HR data.

Of note, **NSSD's initial response to mobilize staff overtime (OT) hours in response to OSR and IIM became a permanent measure** for the years to come. In two instances, OT increased significantly: by 376% in the first six months of 2017 and by 288% in the last eight months of the evaluation

period; the latter instance was part of the BRTAP (see Backlog reduction and transformation action plan). By the end of the evaluation period, 14% of NSSD's total salary expenditures were accounted for by OT (compared to just 0.2% in 2014 to 2015; see Figure 31). In spite of this extraordinary increase in additional time worked by NSSD staff across the Division, this measure alone was not sufficient to contain the backlog until additional, more comprehensive measures were introduced.

Figure 31. NSSD's OT expenditures (all lines of business) grew from 0.2% to 14% of total salary spending



Source: Compiled by the evaluation team using NSSD HR data.

► Text version: Figure 31

Source: Compiled by the evaluation team using NSSD HR data.

Appendix J: IRCC officers' use and assessment of the security screening indicators

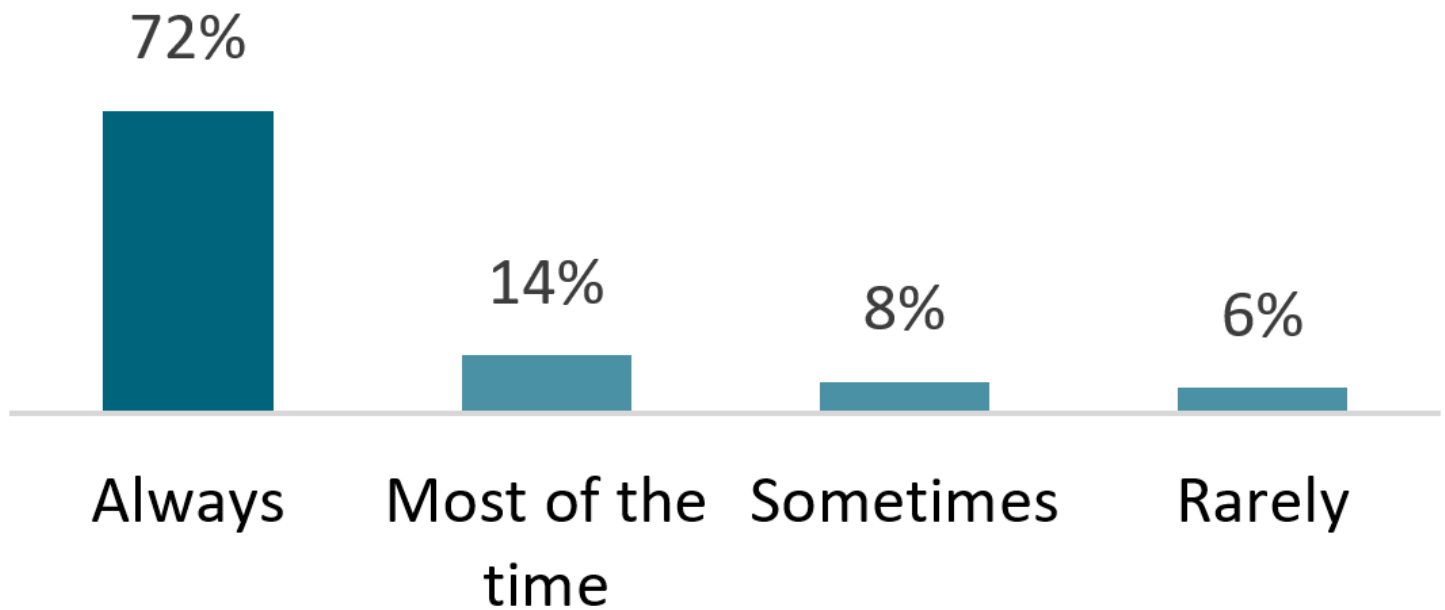
In order for security screening indicators to be effective, they need to be readily accessible and regularly used by IRCC officers. Interviews with internal and external stakeholders indicated that IRCC officers at missions abroad faced challenges in accessing and using security screening indicators due to their Secret/Canadian Eyes Only classification. This classification requires that the indicators are stored securely in locked cabinets in secluded areas of the mission, meaning their retrieval may be onerous and thus discourage officers from consulting them when required.

Nonetheless, most (79%) IRCC officers working at missions overseas who responded to the evaluation survey did not report experiencing issues with accessing the indicators ⁷⁶. Those that did indicated the following issues:

- retrieving the indicators from secure storage is time-consuming (36%)
- physically retrieving the indicators from secure storage is not easy (27%) and
- ensuring the indicators are kept secured throughout the day is time-consuming (25%)

The survey further indicated that most officers consult the indicators on a regular basis and generally find them quite useful. Specifically, 72% of officers said that they always applied the security screening indicators when assessing an application, and 14% applied them most of the time (see Figure 32). However, close to one-third (31%) of all respondents reported that the additional time it takes to consult indicators during an application review sometimes deterred them from doing so.

Figure 32. Most IRCC officers always applied the screening indicators



Source: Compiled by the evaluation team based on survey data.

► Text version: Figure 32

Source: Compiled by the evaluation team based on survey data.

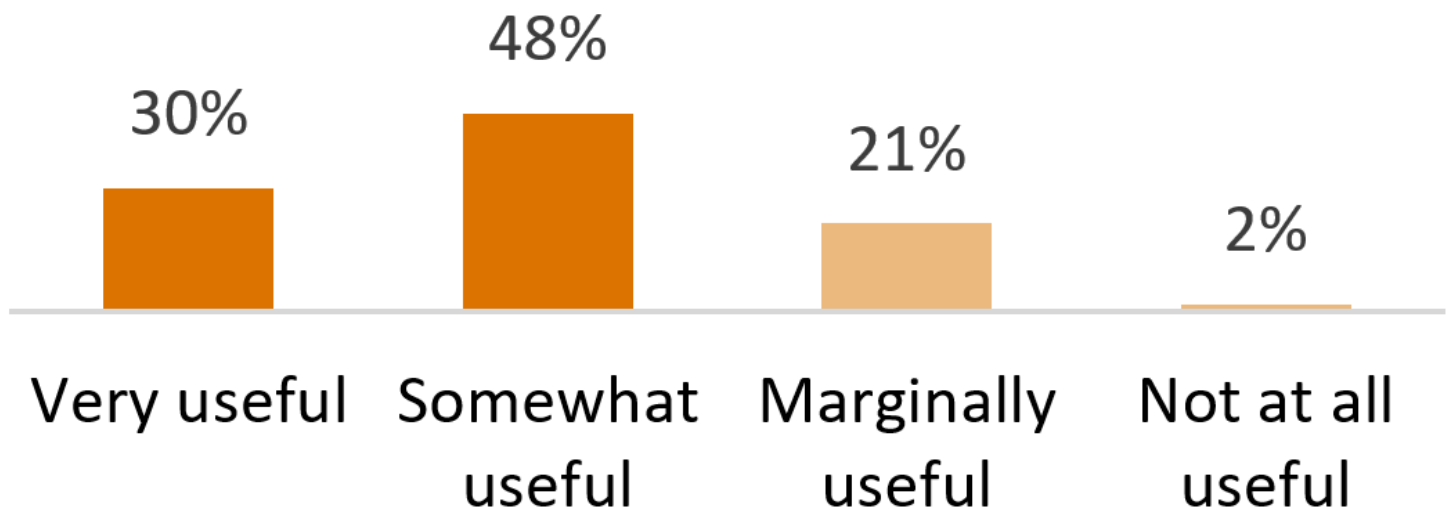
In terms of the usefulness of the indicators, close to one third (30%) of IRCC officers considered them very useful, and another half (48%) considered them somewhat useful (see Figure 33). According to officers, the indicators were useful because they:

- support a clear determination of which applications require a referral (36%)
- allow for a faster assessment of applications (27%) and
- serve as a guidance tool in the referral process (21%)

The IRCC officers who did not find the security screening indicators to be particularly useful cited the following challenges:

- indicators are broad, making it difficult to apply them (38%)
- indicators require information on the applicant that is not easily accessible (21%) and
- there are a large number of indicators to be consulted (17%)

Figure 33. Most IRCC officers considered screening indicators at least somewhat useful



Source: Compiled by the evaluation team based on survey data.

► Text version: Figure 33

Source: Compiled by the evaluation team based on survey data.

Footnotes:

- 61 The NSSD revised the service standards in September 2019. Considering the evaluation scoped period, from 2014 to 2015 to 2018 to 2019, the analysis considered the service standards in effect from April 2014 to March 2019.
- 62 NSSD, Standard Operating Procedure, Volume 0, section 6
- 63 Even though the **percentage** of TR referrals submitted without all required information saw only a minor increase, this increase resulted in a much higher **actual number** of referrals for which NSSD had to follow up with partners (from an average of 291 in 2014 to 2015 to 566 in 2018 to 2019). In the same time period, the difference in the PR and RC business lines was much less significant: 55 to 62 per month for PR and 185 to 128 per month for RC.
- 64 Note that the time periods differ between our quantitative analysis and the NSSD's initiative.
- 65 CBSA, NSSD Annual Report 2019 to 2020, p.12.
- 66 CBSA, NSSD Action Plan Task List, p.6.
- 67 CBSA, NSSD Annual Report 2019 to 2020, p. 10.
- 68 Interviewees indicated that this has yet to be achieved, as NSSD continues to receive referrals with incomplete applicant information from certain missions.

- 69 Previously, these recommendations had a 48-month validity period, which subjected NSSD to repeat screenings that often resulted in the same recommendation. For example, someone who was found inadmissible due to an implication in a war crime (IRPA s.35) would be found inadmissible again 48 months later as that past association would not have changed.
- 70 This may be partially determined by the fact that NSSD looks for information to satisfy its threshold *reasonable grounds to believe*, which may often not be sufficient to convince an IRB member that a foreign national effectively poses a security risk to Canada.
- 71 According to the *IC Manual - Chapter 1, Security Screening Process Manual* (Section 10.4), only extraordinary cases should justify the categorization of a referral as urgent. If a case is assessed as urgent, IRCC officers are instructed to include a clearly articulated rationale, citing national interest or humanitarian and compassionate grounds.
- 72 In 2017, only 18% of claimants received a hearing within the required timeline.
- 73 Office of the Auditor General (OAG). 2019 Spring Reports of the Auditor General of Canada to the Parliament of Canada. Report 2 —Processing of Asylum Claims.
- 74 For example: Keung, N. (Feb 5, 2019). Concerns raised over national security amid refugee screening backlog. The Star.

- 75 For example: Wright, T. (May 16, 2019). Fact check: Has every single refugee claimant in Canada been screened?
- 76 Note that IRCC officers could refer to either set of indicators in their responses **[redacted]**. The classification of both the original and the new thematic sets of indicators is the same, which indicates that any potential barriers to access should be identical.
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2023-02-24