

Report of the Auditor General of Canada

CHAPTER 5
Preventing Illegal Entry Into Canada





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CHAPTER 5

Preventing Illegal Entry Into Canada

Performance audit reports

This report presents the results of a performance audit conducted by the Office of the Auditor General of Canada under the authority of the Auditor General Act.

A performance audit is an independent, objective, and systematic assessment of how well government is managing its activities, responsibilities, and resources. Audit topics are selected based on their significance. While the Office may comment on policy implementation in a performance audit, it does not comment on the merits of a policy.

Performance audits are planned, performed, and reported in accordance with professional auditing standards and Office policies. They are conducted by qualified auditors who

- establish audit objectives and criteria for the assessment of performance,
- gather the evidence necessary to assess performance against the criteria,
- report both positive and negative findings,
- · conclude against the established audit objectives, and
- make recommendations for improvement when there are significant differences between criteria and assessed performance.

Performance audits contribute to a public service that is ethical and effective and a government that is accountable to Parliament and Canadians.

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Preventing Illegal Entry Into Canada

Main Points

What we examined

It is illegal to enter Canada without reporting to a border services officer at a designated port of entry. Foreign nationals enter illegally if they meet the criteria for inadmissibility under the *Immigration and Refugee Protection Act*—for example, providing false information. Some foreign nationals who are inadmissible may be allowed to enter Canada temporarily, but they must agree to meet certain conditions, such as leaving Canada by a specified date.

The Canada Border Services Agency (the Agency) is responsible for preventing illegal entries at ports of entry. The Agency relies on several systems and practices tailored to each mode of travel to assess the risk that travellers are inadmissible and to decide accordingly whether to admit them. The Royal Canadian Mounted Police (RCMP) is responsible for enforcing the law when people cross illegally between ports of entry. It relies on intelligence, patrols, and surveillance technology to detect illegal entries.

In the 2011–12 fiscal year, the Agency processed 98.7 million travellers at ports of entry. About one third were foreign nationals. This means that on average, 90,000 foreign nationals entered Canada per day. During the same year, the Agency denied entry to 54,000 people at ports of entry and intercepted another 4,000 overseas. The RCMP intercepted an additional 1,277 people for entering Canada illegally between ports of entry.

Our audit examined whether selected systems and practices prevent the illegal entry of people into Canada. This included how the government makes decisions about where and how to invest its resources to prevent people from entering illegally. We focused mainly on the systems and practices of the Agency and the RCMP.

We also looked at initiatives included in the 2011 Joint Canada— United States Beyond the Border Action Plan that are intended to change some of the systems and practices included in the audit. We examined whether initiatives that build on existing screening and enforcement systems and practices are designed to address performance issues related to those systems and practices. Audit work for this chapter was completed on 30 August 2013. More details on the conduct of the audit are in **About the Audit** at the end of this chapter.

Why it's important

Failure to prevent illegal entry compromises Canada's border, the immigration program, and the safety and security of Canadians. Illegal entries are a significant burden on taxpayers. In some cases, authorities must spend time, resources, and effort to track down individuals who are considered a significant threat to the safety of Canadians. The government has not estimated the cost of illegal entries, but Citizenship and Immigration Canada estimates that each rejected refugee claimant, some of whom enter Canada illegally, costs taxpayers about \$26,000. The Agency and the RCMP spend about \$728 million per year combined on their border control activities.

Preventing illegal entry has been a policy priority for the federal government, especially since the 11 September 2001 terrorist attacks in the United States. This priority was restated as recently as 2012 in the government's counter-terrorism strategy.

What we found

- Systems and practices for collecting, monitoring, and assessing
 information to prevent the illegal entry of people into Canada are
 often not working as intended. As a result, some people who pose a
 risk to Canadians' safety and security have succeeded in entering the
 country illegally.
- The Agency has made significant progress since our 2007 audit with the development of a National Targeting Program. Despite this, the Agency does not always receive the information it needs from air carriers to efficiently target high-risk passengers. For example, our examination of a sample of 306 passengers found that no Advance Passenger Information was provided on 17 travellers, while the information provided on the rest was often insufficient to fully assess risk prior to arrival. In addition, 8 percent of targets were missed, meaning that the subjects of the targets were not examined at the port of entry as required.
- The Agency has made little progress since 2007 in monitoring the
 results of all lookouts on known high-risk travellers and it still does
 not monitor all missed lookouts, nor does it enter examination
 results on all intercepted lookouts. Our review showed that
 15 percent of lookouts were missed.

- The Agency's performance measures for preventing improperly documented arrivals and for its Admissibility Determination program at ports of entry do not provide a true picture of how well these controls are working. Specifically, its measure of how many passengers are allowed to board flights to Canada without proper documentation does not include all improperly documented travellers. The measures for the Agency's Admissibility Determination program at ports of entry do not include cases in which examinations of travellers were not completed, resulting in people entering the country illegally. The Agency does not have the information it needs to know whether it is securing the border by decreasing the number of people who enter the country illegally.
- The RCMP does not have the information it needs to assess the effectiveness of its interception activities. It does not systematically collect and report information on numbers of known illegal entries where individuals are not apprehended. The information we reviewed from several sources showed that Integrated Border Enforcement Teams intercepted about 50 percent of known illegal entries and that Marine Security Enforcement Teams intercepted about 80 percent. Without systematic performance information, it is not possible to determine what rate of interception is acceptable or whether resources are placed where they are most effective to prevent illegal entry.

The entities have responded. The entities agree with all of the recommendations. Their detailed responses follow the recommendations throughout the chapter.

Introduction

- Under the Customs Act and the Immigration and Refugee Protection Act, anyone seeking to enter Canada must report to an officer of the Canada Border Services Agency (the Agency) at a designated port of entry and answer the officer's questions truthfully. The border services officer decides whether someone who reports should be admitted into Canada. Canadian citizens and permanent residents are allowed to enter once the officer verifies their status, while foreign nationals must demonstrate that they meet the statutory requirements for entry. They must also not be inadmissible for any of the reasons specified in the *Immigration* and *Refugee Protection* Act, including security concerns (such as spying or terrorism), human or international rights violations, or criminality. Some foreign nationals who are inadmissible may be allowed to enter Canada temporarily, provided they agree to certain conditions, such as leaving the country by a specified date. Anyone who fails to comply with any of these requirements has entered Canada illegally.
- 5.2 Preventing illegal entry has been a policy priority for the Government of Canada, especially since the 11 September 2001 terrorist attacks in the United States. In 2004, the National Security Policy identified defending against illegal entry as part of Canada's core national security interests. In 2010, the federal government developed Canada's strategy to combat human smuggling and illegal migration. In the 2011 Beyond the Border Action Plan, the governments of Canada and the United States jointly established the goals of "identifying and interdicting inadmissible persons at the perimeter." More recently, the 2012 Counter-terrorism Strategy gave priority to government activities that
 - ensure inadmissible persons do not enter Canada,
 - protect Canada from terrorist threats at the border, and
 - impede the smuggling of people.
- **5.3** Failure to prevent illegal entry compromises Canada's border, the immigration program, and the safety and security of Canadians. Illegal entries are also a significant burden on taxpayers. For example, authorities must spend time, resources, and effort to track down individuals considered to be significant threats to the safety of Canadians. Although the government has not estimated the cost of illegal entries, Citizenship and Immigration Canada estimates a taxpayer cost of about \$26,000 for each rejected refugee claimant, some of whom enter Canada illegally.

Responsibility for preventing illegal entry

- 5.4 The Canada Border Services Agency and the Royal Canadian Mounted Police (RCMP) are responsible for identifying and, if necessary, intercepting individuals who attempt to enter Canada illegally. They need to gather information on who is entering the country, as well as where, when, and for what purposes.
- 5.5 The Agency is responsible for preventing illegal entry at ports of entry. It relies on several systems and practices to assess the risk associated with each traveller, and to make an admissibility decision accordingly. The RCMP is responsible for enforcing the law when people cross illegally between ports of entry. Both organizations rely on intelligence collected from local, Canadian, and international sources.

Risk-based approach to border management

- **5.6** Under Treasury Board risk management policies, the Agency and the RCMP must make risk-based decisions on how to mitigate the threat of illegal entry. A risk-based approach to border management is designed to support decisions about the best way to allocate resources for mitigating risks.
- 5.7 Canada Border Services Agency. The Agency's Risk Assessment program targets travellers who may be inadmissible as early as possible before they arrive at a Canadian port of entry. It does this by issuing lookouts and, in the case of airline passengers, collecting information on them before their arrival. The Agency's Admissibility Determination program also relies on the judgment of border services officers at ports of entry to identify and intercept inadmissible people.
- 5.8 In the 2011–12 fiscal year, the Agency processed 98.7 million travellers at ports of entry, about one third of whom were foreign nationals. On average, this means that 90,000 non-Canadians entered Canada daily. During the same year, the Agency denied entry to 54,000 people at ports of entry and intercepted another 4,000 overseas. The Agency spent \$117 million on the Risk Assessment program and \$583 million on the Admissibility Determination program. These amounts represented about half the Agency's total budget for the 2011–12 fiscal year. They covered the processing of both travellers and goods; the Agency does not account for these activities separately.

Lookout—Automated message entered into computer systems of the Canada Border Services Agency, for the attention of officers at air, land, or marine ports of entry. It identifies a person, corporation, conveyance, or shipment that may pose a future threat to the health, safety, security, economy, or environment of Canada and Canadians.

Integrated Border Enforcement Team— A Canada—US inter-agency team that identifies, investigates, and intercepts people and organizations involved in criminal activity

between ports of entry.

Marine Security Enforcement Team— An integrated unit that patrols the marine border on the Great Lakes and St. Lawrence Seaway. Members are drawn from the RCMP and the Canadian Coast Guard.

- **5.9** Royal Canadian Mounted Police. Risk management in the RCMP aims to reduce criminal activity that affects Canadians. In addition to organized crime, the RCMP's 2011 Integrated Border Enforcement Team threat assessment identified irregular migration and human smuggling as risks to border security. The RCMP considers people entering the country illegally between ports of entry to be high risk because their intentions are not known. To mitigate these risks, the Integrated Border Enforcement Teams collect and analyze information to guide officers to border locations where illegal activities are occurring. Marine Security Enforcement Teams perform a similar function on selected waterways.
- 5.10 In the 2011–12 fiscal year, the RCMP intercepted 1,277 people for entering Canada illegally between ports of entry and spent \$28 million on the border and marine teams combined. RCMP enforcement teams were made aware of illegal entries through means such as surveillance cameras, routine patrols, or notifications from the Agency, United States border authorities, or the public. The RCMP intercepted the illegal entrants and delivered them to the Agency's local port of entry. The RCMP also arrested and took into custody individuals suspected of helping with illegal entry.

Previous audit findings

- **5.11** In the 2007 October Report of the Auditor General, Chapter 5—Keeping the Border Open and Secure, we examined whether the Canada Border Services Agency's approach to border management was based on threat and risk assessments and achieved the desired levels of border openness and security. We recommended that the Agency complete development of an integrated risk management framework to guide the delivery of border services as well as improve its targeting and examination activities. In particular, we recommended that the Agency
 - better develop its risk-based approach for the delivery of integrated border services, and use this as a basis for deploying its resources and focusing its enforcement efforts;
 - improve its monitoring, documentation, and follow-up of lookouts, and develop measures to ensure that information is collected and shared appropriately; and
 - record the results of its examinations and use them to improve its ability to identify and examine high-risk people and goods.

5.12 There has been no previous audit work on the RCMP's approach to border management.

Focus of the audit

- 5.13 The objective of this audit was to determine whether selected government systems and practices prevent the illegal entry of people into Canada, as defined under the *Immigration and Refugee Protection Act* and the *Customs Act*. Our work included an examination of the way the federal government makes decisions about where and how to invest its resources to prevent people from entering illegally.
- **5.14** The government relies on a suite of enforcement systems and practices to try to prevent illegal entry. The controls may come into play long before a traveller leaves for Canada and may continue long after arrival. Controls included in our audit were screening by airline employees at the point of departure to intercept improperly documented travellers en route to Canada, inadmissibility decisions at ports of entry, and enforcement practices between ports of entry.
- **5.15** The systems and practices we examined were mainly those of the Agency and the RCMP, since they are the primary federal organizations responsible for preventing or responding to illegal entries into Canada. We also looked at the guiding and supporting roles played by other federal organizations.
- **5.16** More details about the audit objective, scope, approach, and criteria are in **About the Audit** at the end of this chapter.

Observations and Recommendations

Border control at ports of entry

5.17 We examined the following controls used by the Canada Border Services Agency (the Agency) to prevent the illegal entry of people into Canada through ports of entry, what each control is designed to achieve, and how the Agency tracks its performance. For some of these controls, we conducted file reviews of representative samples to assess how they are working:

- improperly documented arrivals,
- Advance Passenger Information (API) and Passenger Name Record (PNR),
- air passenger targeting,
- · lookouts, and
- admissibility determination.

Advance Passenger Information—
A traveller's personal information, that is, name, date of birth, gender, citizenship or nationality, and travel document information.

Passenger Name Record—A traveller's reservation and itinerary information, such as type of ticket, date of travel, and number of bags.

Better measures of how many passengers board flights to Canada without proper documentation are needed

- **5.18** The Agency aims to reduce the number of air passengers who arrive in Canada without the travel documents legally required for entry. These types of entry are known as improperly documented arrivals. Under the *Immigration and Refugee Protection Regulations*, the Agency charges administration fees to airlines when border services officers identify such passengers at ports of entry, since the airlines should not have allowed these passengers to board the aircraft.
- **5.19** The Regulations also list the circumstances in which a fee should not be charged, for example, when an improperly documented traveller agrees to leave Canada immediately. In some cases, the Agency does not consider the airline responsible for allowing the traveller to reach Canada, for example, if the traveller used genuine travel documents obtained fraudulently.
- **5.20** We found that the total number of improperly documented arrivals recorded in the Agency's information system increased by 1 percent during the period of the audit, from 2,471 in the 2011–12 fiscal year to 2,508 in 2012–13. That total covers two categories:
 - Cases for which airlines were held responsible—The Agency uses
 this data to measure performance for the program. For the same
 two-year period, the Agency reported a 2 percent decrease in the

Under section 148(1)(a) of the *Immigration* and *Refugee Protection Act*, transporters are prohibited from carrying to Canada any person who does not hold the prescribed documents required for entry. Under section 279(1) of the *Immigration and Refugee Protection Regulations*, failure to meet this requirement can result in an assessment of an administration fee.

- number of such cases, from 2,232 to 2,184. It conducts extensive quality assurance activities to ensure that these numbers are accurate.
- Cases for which the airlines were not held responsible—Although the Agency does not use this data in its program measure, we found that the number of such cases increased from 239 to 324 (36 percent) over these two years. We also found that the Agency's intelligence staff examines this data on an ad hoc basis.
- **5.21** While relatively few in number, the second category of cases is important because it reflects increasingly sophisticated fraud, which makes it difficult for airline staff to identify false travel documents. By including both types of cases in its program measure, the Agency would have the information it needs to know whether it is reducing the number of improperly documented arrivals. Agency officials told us that they were considering including more complete information in future program performance measurement.

The Agency does not receive all the information on air passengers as required by law

- 5.22 Under the *Immigration and Refugee Protection Regulations*, every commercial air carrier is required to submit to the Agency the Advance Passenger Information and Passenger Name Record data collected before a flight arrives in Canada. The Agency analyzes the information using two parallel processes—flight targeting and scenario-based targeting—to identify and *target* passengers who may pose a threat to the security and safety of Canada. While flight targeting is a manual process, scenario-based targeting provides automated risk assessment. The Agency plans to rely increasingly on scenario-based targeting.
- **5.23** We examined a representative sample of 306 passengers who arrived in Canada from September to November 2012, to assess whether complete Advance Passenger Information and Passenger Name Record data had been provided to the Agency on time. We found that, because Passenger Name Record data elements were missing, 35 passengers (11 percent) could not be assessed against any scenarios and 258 (84 percent) could be assessed only against some.
- **5.24** Agency targeters may also review advance information (both API and PNR) on flights manually. If Passenger Name Record data is not available, a target can be issued based only on Advance Passenger Information through this manual process. The Agency could not tell us the proportion of flights reviewed, but flight volumes make it

Target—Automated message entered into computer systems of the Canada Border Services Agency by its National Targeting Centre, for the attention of officers mainly at air ports of entry. An arriving passenger who matches the target needs to be intercepted and examined.

impossible for targeters to manually review all international flights arriving in Canada; instead, they use risk indicators to choose which flights to analyze. Therefore, some passengers are not risk assessed by either scenario-based or flight targeting. As well, our sample found that, for 17 passengers (6 percent), no Advance Passenger Information was provided.

- 5.25 Despite the problems with incomplete advance information, the Agency reported an average 99-percent rate of compliance by airlines for the 2011–12 fiscal year. In fact, the Agency considered airlines to be in compliance if they supplied any Advance Passenger Information on a flight, whether or not it was complete. The compliance rate also did not take Passenger Name Record into account at all, even though it is important to the Agency's targeting processes. Further, the Agency does not determine whether it has information on every passenger for each flight. The performance measure therefore gives an inaccurate picture of airline compliance. More important, air passenger targeting cannot work without good-quality Advance Passenger Information and Passenger Name Record data.
- **5.26** Three initiatives included in the 2011 joint Canada–US Beyond the Border Action Plan are expected to make changes to the systems and practices used to prevent the illegal entry of people into Canada:
 - The new Interactive Advance Passenger Information initiative will require that traveller data for commercial flights be provided up to 72 hours before departure. It is due to be implemented in fall 2015.
 - The Entry/Exit Information System proposes to use passenger manifest information for flights leaving Canada to record the exit of individuals from the country. A system is to be developed by 30 June 2014.
 - The Enhanced Scenario-based Targeting initiative will further automate the Agency's targeting system based on Passenger Name Record data. It is due to be implemented in October 2013.
- 5.27 While all three initiatives rely heavily on advance information, none of the initiatives currently includes a plan to improve information quality. However, during the audit period, the Agency developed an action plan designed to improve the quality of the Advance Passenger Information and Passenger Name Record data it receives. The plan includes more systematic monitoring and reporting, and sharing of the results with airlines. The plan is scheduled to be fully implemented by June 2014.

5.28 Recommendation. The Canada Border Services Agency should implement its action plan to improve the quality of Advance Passenger Information and Passenger Name Record data by the stated June 2014 deadline.

The Agency's response. Agreed. The Canada Border Services Agency is currently implementing a comprehensive action plan to improve the quality of Advance Passenger Information and Passenger Name Record data being provided to the Agency by international carriers. This plan will be fully implemented by 30 June 2014. It will provide strengthened direction to airlines on collecting and providing Advance Passenger Information and Passenger Name Record data, and will provide airlines with a regular report on their performance in terms of compliance and data quality. In addition, as part of the action plan, the Agency will implement an automated monitoring system enabling it to quickly identify issues with the quality of all incoming data.

The Agency will leverage these new tools to improve the quality of Advance Passenger Information and Passenger Name Record data. The Agency will ensure improved compliance with legislative and regulatory requirements, and will continue to issue administrative monetary penalties in instances where an airline fails to provide the prescribed information. For the longer term, as part of its border modernization initiatives, the Agency will continue to review opportunities to improve the quality of this information.

The new National Targeting Program has good practices, but some targets were still missed

- **5.29** Once the Agency receives Advance Passenger Information and Passenger Name Record data, it is analyzed by automated targeting systems and Agency targeters to identify air passengers who pose a threat to the security and safety of Canada before their arrival.
- **5.30** In our 2007 audit, Keeping the Border Open and Secure, we recommended that the Agency ensure that targeters consistently document their reasons for all decisions concerning **referrals** for examination, that officers document the results of examinations, and that this information be used to improve the identification of high-risk people. The Agency agreed with our recommendations and responded that, among other actions, it would monitor results documentation and would use the results to improve future referrals of people for examination.

Referral—Decision that an arriving traveller at a port of entry should proceed from primary inspection to the secondary inspection area for further examination.

- 5.31 Following our recommendations, the Agency implemented a new National Targeting Program in the 2012–13 fiscal year. We found significant improvements in the program, including the development of formal standard operating procedures and training, and a framework to systematically measure and monitor program performance. We examined a representative sample of 49 targets issued in March and April 2013, and found that targeters consistently documented their reasons for referrals. We also found that, compared with our 2007 findings, border services officers at ports of entry were much better at entering examination results. When targets were examined at secondary inspection as required, examination results were entered in all but one case.
- 5.32 At the same time, we found that, while 45 of the 49 targets (92 percent) were referred from primary to secondary inspection as required, there were 4 missed targets. These were issued for human smuggling, criminal inadmissibility (two cases), and immigration fraud. In two cases, the traveller entered Canada without the required further examination. In the other two cases, there was no record that the individuals had passed through the port of entry. The Agency explained that the two persons might not have boarded the aircraft after checking in. Another possibility is that they entered through fraudulent means and therefore were not identified on arrival. The Agency still considers these two cases missed targets. The Agency had also identified these missed targets through its monitoring process.

The Agency has made little improvement in its monitoring of immigration lookouts since 2007

- **5.33** Lookouts are intended to intercept known high-risk individuals who attempt to enter Canada and are connected to activities such as terrorism, organized crime, or irregular migration. In our 2007 audit, we recommended that the Agency improve its monitoring, documentation, and follow-up of lookouts. The Agency agreed and responded that it would improve its lookout monitoring and follow-up.
- 5.34 To measure and monitor the performance of lookouts, the Agency uses the percentage of people who are referred to secondary inspection as a result of lookouts, and are then found to be inadmissible. However, we found that the information needed to assess performance is lacking. The main computer system used by the Agency to issue immigration-related lookouts, the Field Operations Support System (FOSS), does not record when an interception takes place. Immigration lookouts can also be entered into the Integrated Customs Enforcement System (ICES), but there is no formal policy

Field Operations Support System— A Citizenship and Immigration Canada system used by the Canada Border Sprices Agency

used by the Canada Border Services Agency for immigration enforcement.

Integrated Customs Enforcement System—A system used by the Canada Border Services Agency to record information about past and potential customs violators and, since the 2012—13 fiscal year, information about immigration-related targets and lookouts.

guiding this practice, and we found that lookouts may be entered in one of the systems or both. ICES records interceptions, and the Agency monitors whether examination results are entered and complete in the system. Nevertheless, this monitoring covers only immigration lookouts included in ICES, and, except for one region, it does not include information about missed lookouts.

- For immigration cases and other categories of lookouts that the Agency considers significant, when a lookout matches a passenger scheduled to arrive, the targeter provides advance notification by contacting the port of entry to warn that the individual is heading toward Canada. To determine whether the subjects of lookouts are intercepted and sent for examination, and the results are recorded, we conducted a file review of all 34 advance notifications concerning immigration-related lookouts that were sent by the National Targeting Centre to ports of entry during February 2013. We found that, for 5 of the 34 lookouts (15 percent), the individual identified was not examined as required. In 4 cases, the travellers entered Canada. For the remaining case, similar to the two missed targets discussed earlier (see paragraph 5.32), there was no record that the person arrived in Canada. The individual might not have boarded the aircraft after checking in or might have entered through fraudulent means. We also found that examination results were not recorded for another 12 cases (35 percent).
- **5.36** A 2013 internal audit examined the Agency's lookout processes for travellers. It focused mainly on customs lookouts and information in ICES. It found problems with performance information and monitoring.
- 5.37 Given the seriousness of the threats that lookouts are designed to address, even one missed lookout is cause for concern. Without relevant performance data, the Agency does not have information on whether lookouts are working as intended or how it can improve on results. The 2013 internal audit recommended that the Agency improve its monitoring of lookouts, and particularly that it establish a performance measurement system to systematically track, monitor, and report on missed lookouts. The Agency has made little progress since our 2007 audit in improving lookout results monitoring.
- **5.38** Recommendation. The Canada Border Services Agency should implement its action plan in response to recommendations from its 2013 internal audit of lookouts by the stated March 2014 deadline.

The Agency's response. Agreed. The Canada Border Services Agency will implement the lookouts action plan by March 2014, in response to the 2013 internal audit. This action plan is part of a continuing effort to improve the overall effectiveness and management of the lookouts program. It will provide strengthened accountabilities for lookouts monitoring, improved national procedures for lookouts management, training for regional staff to reinforce the need for data integrity, and a rigorous quality assurance and performance measurement process.

The Agency's performance information is incomplete on how admissibility controls are working at ports of entry

- **5.39** The Agency's Admissibility Determination program is designed to ensure that people who are inadmissible to Canada are intercepted at ports of entry through the primary and secondary inspection systems and practices. Inspection is a key control for preventing illegal entry for all modes of transportation, particularly where advance information is not systematically provided. It is also the point at which the subjects of targets and lookouts identified through advance information are intercepted.
- **5.40** The performance of the Admissibility Determination program is measured by the percentage of people examined who are inadmissible or arrested. However, this measure does not include information about the circumstances in which people circumvent primary or secondary inspections, and consequently succeed in entering the country illegally. Examples of such failures include missed targets and lookouts, as well as **port runners** and cases in which individuals failed to return to the port of entry for further examination or departure, as required.
- **5.41** We examined the Agency's removals database to understand when, where, and how individuals had entered Canada illegally. The removals database contains information on individuals under a **removal order**. We found 409 individuals in the database who had entered illegally in the past five years. This is not a complete list of illegal entry cases because the database does not always include information about how individuals entered Canada. The 409 were foreign nationals who had failed to complete an examination or who did not report at all at a port of entry. From these, we randomly selected 49 cases.
- **5.42** We found that, in 15 cases (31 percent), the individuals entered Canada at a port of entry. In 11 of the 15 cases, the individuals were deemed inadmissible at the port of entry, but were allowed to enter Canada temporarily with a requirement to return to the port of entry,

Port runner—Individual traveller or driver of a commercial or private vehicle who intentionally goes through a port of entry, but does not stop or does not complete the full Canada Border Services Agency clearance process.

Removal order—Order to remove an individual from Canada for breaching the *Immigration and Refugee Protection Act*.

usually the next day, for departure or further examination. This is in accordance with the *Immigration and Refugee Protection Act*. The individuals subsequently failed to appear at the port of entry as required. Four of the 11 individuals had criminal records, 2 of them for more serious offences. The remaining 4 cases involved port runners, who failed to stop and report for examination.

5.43 We found that the Agency monitors the number of port runner cases, but it does not track the number of cases that fail to return to the port of entry for further examination or departure. In these cases, an arrest warrant is issued. Warrants are monitored as a whole, but not warrants specifically for circumventing port of entry examination. This information, combined with information on port runners as well as missed targets and lookouts, could contribute to the Agency's understanding of how well the primary and secondary systems and practices within the Admissibility Determination program are working. Review of the combined information would help the Agency to better understand how people circumvent this key control.

The Agency has not defined the availability required of its immigration enforcement information systems

- enforcement information systems, primarily FOSS and ICES. At primary inspection, border services officers scan or manually input travel document information, which is verified against the information in those systems. The systems automatically notify the officers when travellers must be referred to secondary inspection for further examination—for example, in response to a target or lookout. The officers can also use their judgment to determine whether a referral is required. At secondary inspection, officers use FOSS, ICES, and other systems to further assess an individual's admissibility, and they document the results of the examination. When information systems are not available, officers must rely solely on their knowledge and judgment to determine the admissibility of travellers.
- 5.45 We examined whether the immigration enforcement information systems are available when required. The Agency has identified these as high-availability systems, but they are not available all the time, since they experience outages and sometimes require maintenance. The Agency reviews the impact of system outages and uses this information to carry out improvement activities. Despite this, it could not tell us the level of system availability achieved overall. The Agency also could not specify the availability level required for each

Availability—The ability of an information technology system to perform its agreed function when required. It is expressed as the percentage of time that a system is fully functioning.

of its immigration enforcement systems to ensure that the controls designed to prevent illegal entry of people work as intended.

5.46 FOSS is scheduled for decommissioning in December 2014. At the time of the audit, the Agency and Citizenship and Immigration Canada did not have an agreed plan to implement a replacement system by that date. In the meantime, the Agency is taking steps to keep FOSS operating beyond its scheduled shutdown. At the time of our audit, the necessary extension to the support contract was not in place.

5.47 Recommendation. The Canada Border Services Agency should define the level of availability required of its immigration enforcement information systems, monitor the level of availability achieved, and use the information to guide efforts to improve availability.

The Agency's response. Agreed. The Canada Border Services Agency will review and reconfirm availability requirements for its key immigration enforcement information systems and will work with its service providers to ensure the measurement and reporting of information system availability by November 2013. Also by November 2013, the Agency will engage Shared Services Canada (SSC) to align the SSC service management framework with the Agency's IM/IT dashboard for integrated service level reporting, with strong links to IT incident and problem management processes and resulting corrective measures. The Agency will use a planned and phased approach to review and reconfirm preliminary availability levels, monitor and report those levels through the Agency IM/IT dashboard, and adjust availability levels and supporting agreements periodically, as appropriate. The Agency expects to incorporate new and adjusted system availability reporting into quarterly performance reports by January 2014. The Agency further expects to leverage reporting data and availability trends to inform efforts to improve availability and undertake corrective measures for key systems where appropriate.

Border control between ports of entry

5.48 We examined the intelligence-led law enforcement teams used by the Royal Canadian Mounted Police (RCMP) to prevent the illegal entry of people between ports of entry, what the teams are designed to achieve, and how their performance is measured. We also conducted file reviews of representative samples of illegal entry incidents within the mandate of these teams:

- Integrated Border Enforcement Teams, and
- Marine Security Enforcement Teams.

The RCMP lacks information to monitor the success of its border enforcement activities

- **5.49** Integrated Border Enforcement Teams. The RCMP stations Integrated Border Enforcement Teams in 22 locations along Canada's border. Their objective is to contribute to the safety and security of Canada by protecting its borders, citizens, and institutions from transnational and domestic criminality.
- performance measures for the teams, but has not systematically gathered the relevant information. For example, each region was required to report on the number of apprehensions between ports of entry and also the number of known illegal entries into Canada where the individuals were not apprehended, but this information has not been collected systematically. In 2011, the RCMP collected the number of apprehensions for 2010 and the number of known illegal entries where the individuals were not apprehended. In contrast, in 2012, the RCMP collected only the number of apprehensions for 2011, not the number of known illegal entries. Both types of information are necessary to assess how effective the teams are and whether they are reducing illegal entries. The data showed that 64 percent of known illegal entries were apprehended in 2010.
- There are several sources that provide information about the rate at which the police forces are able to intercept known illegal entries. First, we examined a representative sample of 49 cases from the RCMP's border occurrence databases for the 2011–12 and 2012–13 fiscal years. Our aim was to assess whether Integrated Border Enforcement Teams were able to respond to all cases of known or suspected illegal entry. We found that in 26 of the 49 cases (53 percent), Integrated Border Enforcement Teams intercepted an illegal entry or patrolled an area where an illegal entry was suspected. In the remaining 23 cases (47 percent), Integrated Border Enforcement Teams were unable to intercept illegal entry attempts. The RCMP's documentation provides several explanations for no apprehension in these known incidents. For example, no officer was present to apprehend the individual observed crossing on a surveillance camera or by the United States Border Patrol, officers became aware of the illegal entry only after the fact, or the individuals evaded pursuit.
- **5.52** We also examined 49 removal cases in the Canada Border Service Agency's (the Agency) database (see paragraph 5.41). We found that 34 cases involved attempted entry between ports of entry.

Known illegal entries—Cases of individuals apprehended entering Canada illegally, or not apprehended but known to have entered based on reliable evidence such as surveillance cameras and law enforcement sightings.

The RCMP and its provincial or municipal law enforcement partners intercepted slightly over half of the 34 cases (19); the other 15 were identified once they were already inside the country. For example, the individual self-identified at an Agency office to make a refugee claim or became involved with the criminal justice system.

- **5.53** In the absence of systematic performance information, it is not possible to determine whether these interception rates are typical or how resources can be effectively allocated to prevent illegal entry.
- substantial additional resources. This was shown by Project Concept, launched in May 2010 by the RCMP to respond to a suspected increase in illegal activity along a 140-kilometre section of the Canada–US land border in Quebec. The RCMP established an operations centre to coordinate information about incidents, deployed additional surveillance technology and, along with the Sûreté du Québec, assigned more uniformed officers to border patrolling. The RCMP also established a more comprehensive performance monitoring approach for Project Concept, with a dedicated intelligence analyst. According to the project evaluation, one result was that the number of apprehensions of people crossing the border illegally more than tripled in the first seven months that the project was operational. The evaluation, however, did not report on missed interceptions.
- 5.55 Marine Security Enforcement Teams. Like the land-based border enforcement teams, Marine Security Enforcement Teams seek to contribute to the safety and security of Canada by protecting its borders. There are four marine teams: three on the Great Lakes and one on the St. Lawrence Seaway.
- 5.56 To assess whether the marine teams were able to respond to known or suspected border occurrences, we examined a sample of 43 cases from the RCMP's border occurrence databases for the fiscal years 2011–12 and 2012–13. We found that, in 35 of the 43 cases (81 percent), the teams intercepted an illegal entry or patrolled an area where an illegal entry was suspected. In the remaining 8 cases (19 percent), marine teams were unable to intercept illegal entry attempts—for example, because officers were not available, or the individuals evaded pursuit.

- Border Enforcement Teams, occurred in spite of the fact that overall marine team availability has been lower than planned. For the past two years, the Canadian Coast Guard did not provide the equipment and crew required for marine team operations as often as agreed. In the 2011–12 fiscal year, the vessels were not available 5 percent of the time; in 2012–13, they were not available 17 percent of the time. The lower availability in 2012–13 was the result of delays in bringing into operation four new mid-shore patrol vessels. The first vessel was due to be operational by the end of August 2012, with the others to follow at three-month intervals. About one year later, at the time of our audit, none of the new vessels was fully operational. In the interim, marine patrols are conducted using smaller boats that limit the range of patrols.
- **5.58** The RCMP is not able to intercept all illegal entries into Canada between ports of entry. The information we gathered shows that different approaches may achieve varying results. Nonetheless, without consistent performance measurement, the RCMP cannot determine which results represented acceptable performance. It also cannot determine whether its ability to prevent illegal entry is improving or declining.
- **5.59** During our audit, the RCMP explained that it had begun to implement a new Federal Policing model, which is changing how the RCMP is organized and allocates resources. Under the model, the RCMP is developing a new Program Alignment Architecture and an associated Performance Measurement Framework. These steps are expected to be completed in 2014.
- **5.60 Recommendation.** The Royal Canadian Mounted Police should develop and fully implement a framework to measure and monitor the performance of its border law enforcement activities.

The RCMP's response. Agreed. The Royal Canadian Mounted Police will establish a working group with a mandate to review and propose changes to the existing RCMP Program Alignment Architecture (PAA) and Performance Measurement Framework (PMF), with a full implementation deadline of fiscal year 2015–16. The revised PAA/PMF will reflect the re-engineered Federal Policing service delivery model and will better guide the Federal Policing senior management team's resource allocation decisions to be based on program requirements, resource availability, financial constraints, performance metrics, threat assessments, operational priorities, and risks.

Resource allocation

5.61 We examined key aspects of the risk-based business planning processes of the Canada Border Services Agency (the Agency) and the Royal Canadian Mounted Police (RCMP). We looked at the way risks are identified, assessed, and prioritized, and whether they are aligned with government-identified threats and priorities, including consideration of shared risks with key federal partners. Finally, we looked at whether resources are allocated based on risk severity, the performance of existing systems and practices, and the assessed impact of any trade-offs required because of resource constraints.

The Agency is developing integrated business plans to guide resource allocation

- **5.62** Our 2007 audit recommended that the Agency better develop its risk-based approach for the delivery of integrated border services, and use this as a basis for deploying its resources and focusing its enforcement efforts. The Agency agreed and said that it would develop an integrated risk management framework that would inform decision making and priority setting, and provide for continuous improvement.
- **5.63** We found that the Agency has made satisfactory progress and has put in place an integrated risk management framework. We also found that the risks identified by the Agency align with threats and priorities identified by the Government of Canada, and that the Agency consults with key federal partners to consider shared risks.
- 5.64 At the time of the audit, the Agency had also developed an integrated business plan methodology and template intended to link resource allocation to an analysis of risk severity, performance, and the impact of any trade-offs required. The integrated business plans are designed to allow the Agency to use risk and performance information to identify priorities for three fiscal years. Completed integrated business plans are expected to be in place for the first time during the 2013–14 fiscal year.

The RCMP does not use performance information to guide resource allocation

- **5.65** We found that the RCMP has put in place an integrated risk management framework. We also found that the risks identified by the RCMP align with threats and priorities identified by the Government of Canada, and that the RCMP consults with key federal partners to consider shared risks.
- **5.66** At the same time, we found that the RCMP does not use performance information to guide resource allocation for its Integrated Border Enforcement Teams and Marine Security Enforcement Teams,

as required by its integrated risk management framework. As well, the organization does not systematically keep records of resource allocation decisions. It is therefore not possible to review how, when, and why the RCMP made resource allocation decisions.

Conclusion

- **5.67** We concluded that the audited systems and practices to prevent the illegal entry of people into Canada are often not operating as intended. Through our audit investigations, we found that some people who pose a risk to Canadians' safety and security have succeeded in entering the country illegally.
- 5.68 While the Canada Border Services Agency has made significant improvements since our 2007 audit with the development of a National Targeting Program, it does not always have the information it needs to target high-risk passengers efficiently. The Agency has also made little progress in its monitoring of immigration lookouts since our 2007 audit and still does not monitor all missed lookouts, nor does it input examination results on all intercepted lookouts. We found that 8 percent of targets and 15 percent of lookouts were missed.
- **5.69** Further, the Agency does not have the information required to know whether it is securing the border by decreasing the number of people who enter the country illegally. The Agency needs to improve its performance measures for preventing improperly documented arrivals and for its Admissibility Determination program at ports of entry. Neither measure provides a true picture of how well the controls are working to prevent the illegal entry of people into Canada.
- 5.70 The Admissibility Determination program relies on information systems to prevent illegal entry. The Agency has not defined and does not monitor the overall availability level required of its immigration enforcement systems. The Field Operations Support System is scheduled to shut down in December 2014 and the Agency was taking steps to keep it operating beyond that date. At the time of our audit, the necessary extension to the support contract was not in place.
- **5.71** The Agency has made satisfactory progress on an integrated risk management framework. During the 2013–14 fiscal year, the Agency expects to put in place integrated business plans to complete the process of allocating resources based on risk severity, performance, and the assessed impact of any trade-offs required.

- 5.72 The Royal Canadian Mounted Police (RCMP) does not systematically collect and report information on numbers of known illegal entries where the individuals are not apprehended—information that is necessary to assess the effectiveness of interception activities. However, we reviewed information from several sources, which showed that Integrated Border Enforcement Teams intercepted about 50 percent of known illegal entries and that Marine Enforcement Security Teams intercepted about 80 percent. The RCMP also does not use performance information to guide resource allocation, as required by its integrated risk management framework, and it does not systematically keep records of resource allocation decisions. As a result, the RCMP does not know whether resources are placed where they are most effective.
- **5.73** Without the necessary information on results, the government is unable to allocate resources based on assessed risks. Better performance information would enable the government to improve its efforts to prevent illegal entry into Canada.

About the Audit

All of the audit work in this chapter was conducted in accordance with the standards for assurance engagements set out in The Canadian Institute of Chartered Accountants Handbook—Assurance. While the Office adopts these standards as the minimum requirement for our audits, we also draw upon the standards and practices of other disciplines.

As part of our regular audit process, we obtained management's confirmation that the findings reported in this chapter are factually based.

Objective

The objective of the audit was to determine whether selected government systems and practices to prevent the illegal entry of people into Canada are working as intended.

Scope and approach

The scope of the audit mainly included the systems and practices of the Canada Border Services Agency (the Agency) and the Royal Canadian Mounted Police (RCMP) in preventing the illegal entry of people into Canada. Where other federal organizations play a role in supporting the Agency and the RCMP to achieve this objective, they were included in the scope. These organizations included the Canadian Coast Guard, the Canadian Security Intelligence Service, Citizenship and Immigration Canada, Passport Canada, Public Safety Canada and the Privy Council Office. The audit focused on the following activities:

- integrated risk assessment and resource allocation,
- the interception overseas of improperly documented travellers en route to Canada,
- screening at ports of entry, and
- enforcement practices between ports of entry.

Individuals included in the audit were foreign nationals seeking entry into Canada at a port of entry, and anyone who committed an illegal act by entering Canada between ports of entry.

Further, we looked at certain initiatives under the 2011 Beyond the Border Action Plan that are aimed at changing some of the systems and practices included in our audit. We examined whether these initiatives are designed to address performance issues found in the existing systems and practices. We also examined whether Canada is on track to meet its commitments associated with the initiatives. We did not examine the management of the initiatives.

We did not examine pre-border prevention activities conducted by the Agency, the RCMP, and their partners to gather intelligence on, and disrupt the plans of, individuals or organizations intending to come to Canada illegally. With respect to issuing key travel documents such as visas, in 2011 we examined screening and prevention processes before visa issuance (see the 2011 Fall Report of the Auditor General, Chapter 2—Issuing Visas). We also excluded post-border activities as well as activities to prevent internal conspiracies.

We interviewed officials, reviewed documents, and conducted process and system walk-throughs at the national headquarters of the federal organizations included in the scope of the audit. We also interviewed officials and reviewed documents in regional offices of the Agency and the RCMP in British Columbia.

In addition, we conducted file reviews of the following representative samples of border-related activities:

- a sample of 102 flights (45 from the United States and 57 from other international destinations) from a population of 61,684 carrying 5.6 million passengers arriving in Canada between 1 September and 30 November 2012, and a sample of 306 passengers from the population of approximately 15,000 on those 102 flights, to assess whether complete advance passenger information was provided to the Agency;
- a sample of 49 targets from a population of 998 targets issued in March and April 2013, to assess whether air passenger targets were working as intended; and
- a sample of 49 cases from a population of 1,427 Integrated Border Enforcement Team reports and a sample of 43 cases from a population of 476 Marine Security Enforcement Team reports in the RCMP's Police Reporting and Occurrence System and its Police Records Information Management Environment databases for the fiscal years 2011–12 and 2012–13, to assess whether those teams were able to respond to known border occurrences.

The results for each of the random samples is considered accurate to within 10 percent, 9 times out of 10.

To assess whether lookouts were working as intended, we conducted a census file review of all 34 advance notifications of immigration-related lookouts sent by the Agency's National Targeting Centre to ports of entry during the month of February 2013.

To assess how people enter Canada illegally, we examined 49 cases out of a population of 409 from the Agency's removals database concerning people who entered between 2008 and 2012. The database does not always capture the individuals' circumstances of entry, and therefore the population includes only cases in which the following information was recorded in the database: foreign nationals did not report to a port of entry when entering Canada or foreign nationals failed to be examined by a border services officer at the port of entry.

Criteria

Criteria	Sources		
To determine whether selected Government of Canada systems and practices to prevent the illegal entry of people into Canada are working as intended, we used the following criteria:			
 Selected federal organizations' processes to assess risks of the illegal entry of people into Canada are integrated in that they are aligned with the threats identified by the Government of Canada; consider the management of shared risks with key federal partners when determining how to manage organizational risks; identify, assess, and prioritize risks; and have a plan to respond to each risk that outlines specific actions, responsibilities, and timelines; are commensurate with the level of risk; and are commensurate with the organization's tolerance for risk. 	 Framework for the Management of Risk, Treasury Board, 2010 Guide to Integrated Risk Management, Treasury Board, 2010 Enterprise Risk Management Policy, Canada Border Services Agency, 2010 Policy on Integrated Risk Management, Citizenship and Immigration Canada, 2010 Integrated Risk Management Policy, Royal Canadian Mounted Police (RCMP), updated 2011 Risk Management Handbook, RCMP, 2010 Building Resilience Against Terrorism: Canada's Counterterrorism Strategy, 2012 Beyond the Border Action Plan, 2011 		
Selected federal organizations' risk-based business planning directs risk response resource allocation for the systems and practices to prevent the illegal entry of people into Canada based on • the purposes for which the funding was authorized;	 Financial Administration Act, 1985 Framework for the Management of Risk, Treasury Board, 2010 Guide to Integrated Risk Management, Treasury Board, 2010 Enterprise Risk Management Policy, Canada Border Services 		
 the severity of the risk; how well existing prevention systems and practices are working, and whether additional resources are needed to improve performance; and the availability of resources and, if trade-offs are required due 	Agency, 2010 Integrated Risk Management Policy, RCMP, updated 2011 Risk Management Handbook, RCMP, 2010 Policy on Financial Resource Management, Information and Reporting, Treasury Board, 2010		
to resource constraints, an assessment of the implications of those trade-offs for managing the risk. Accountable parties assess the performance of the organization's risk responses by • establishing performance indicators that provide clear and measurable evidence of improved outcomes,	 Framework for the Management of Risk, Treasury Board, 2010 Guide to Integrated Risk Management, Treasury Board, 2010 Policy on Internal Control, Treasury Board, 2009 		
 monitoring risk responses on a routine basis, and incorporating lessons learned for improved performance. 	 Enterprise Risk Management Policy, Canada Border Services Agency, 2010 Risk Management Handbook, RCMP, 2010 Integrated Risk Management Policy, RCMP, updated 2011 		

Criteria	Sources		
To determine whether selected Government of Canada systems and practices to prevent the illegal entry of people into Canada are working as intended, we used the following criteria: (Continued)			
Information systems critical to preventing the illegal entry of people into Canada	Policy on Information Management, Treasury Board, 2007, updated 2012		
provide quality information,are available and usable when required,are properly managed, and	 Policy Framework for Information and Technology, Treasury Board, 2007, updated 2012 Directive on Information Management Roles and Responsibilities, Treasury Board, 2007 		
facilitate reporting requirements and decision making.	• COBIT 5, 2012		

Management reviewed and accepted the suitability of the criteria used in the audit.

Period covered by the audit

The audit covered the 2011–12 and 2012–13 fiscal years. However, some documents reviewed predate this period. Audit work for this chapter was completed on 30 August 2013.

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Appendix List of recommendations

The following is a list of recommendations found in Chapter 5. The number in front of the recommendation indicates the paragraph where it appears in the chapter. The numbers in parentheses indicate the paragraphs where the topic is discussed.

Recommendation	Response
Border control at ports of entry	
5.28 The Canada Border Services Agency should implement its action plan to improve the quality of Advance Passenger Information and Passenger Name Record data by the stated June 2014 deadline. (5.22–5.27)	The Agency's response. Agreed. The Canada Border Services Agency is currently implementing a comprehensive action plan to improve the quality of Advance Passenger Information and Passenger Name Record data being provided to the Agency by international carriers. This plan will be fully implemented by 30 June 2014. It will provide strengthened direction to airlines on collecting and providing Advance Passenger Information and Passenger Name Record data, and will provide airlines with a regular report on their performance in terms of compliance and data quality. In addition, as part of the action plan, the Agency will implement an automated monitoring system enabling it to quickly identify issues with the quality of all incoming data.
	The Agency will leverage these new tools to improve the quality of Advance Passenger Information and Passenger Name Record data. The Agency will ensure improved compliance with legislative and regulatory requirements, and will continue to issue administrative monetary penalties in instances where an airline fails to provide the prescribed information. For the longer term, as part of its border modernization initiatives, the Agency will continue to review opportunities to improve the quality of this information.
5.38 The Canada Border Services Agency should implement its action plan in response to recommendations from its 2013 internal audit of lookouts by the stated March 2014 deadline. (5.33–5.37)	The Agency's response. Agreed. The Canada Border Services Agency will implement the lookouts action plan by March 2014, in response to the 2013 internal audit. This action plan is part of a continuing effort to improve the overall effectiveness and management of the lookouts program. It will provide strengthened accountabilities for lookouts monitoring, improved national procedures for lookouts management, training for regional staff to reinforce the need for data integrity, and a rigorous quality assurance and performance measurement process.

Recommendation

5.47 The Canada Border Services Agency should define the level of availability required of its immigration enforcement information systems, monitor the level of availability achieved, and use the information to guide efforts to improve availability. **(5.44–5.46)**

Response

The Agency's response. Agreed. The Canada Border Services Agency will review and reconfirm availability requirements for its key immigration enforcement information systems and will work with its service providers to ensure the measurement and reporting of information system availability by November 2013. Also by November 2013, the Agency will engage Shared Services Canada (SSC) to align the SSC service management framework with the Agency's IM/IT dashboard for integrated service level reporting, with strong links to IT incident and problem management processes and resulting corrective measures. The Agency will use a planned and phased approach to review and reconfirm preliminary availability levels, monitor and report those levels through the Agency IM/IT dashboard, and adjust availability levels and supporting agreements periodically, as appropriate. The Agency expects to incorporate new and adjusted system availability reporting into quarterly performance reports by January 2014. The Agency further expects to leverage reporting data and availability trends to inform efforts to improve availability and undertake corrective measures for key systems where appropriate.

Border control between ports of entry

5.60 The Royal Canadian Mounted Police should develop and fully implement a framework to measure and monitor the performance of its border law enforcement activities. (5.49–5.59)

The RCMP's response. Agreed. The Royal Canadian Mounted Police will establish a working group with a mandate to review and propose changes to the existing RCMP Program Alignment Architecture (PAA) and Performance Measurement Framework (PMF), with a full implementation deadline of fiscal year 2015–16. The revised PAA/PMF will reflect the re-engineered Federal Policing service delivery model and will better guide the Federal Policing senior management team's resource allocation decisions to be based on program requirements, resource availability, financial constraints, performance metrics, threat assessments, operational priorities, and risks.