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Reports of the Auditor General of Canada

REPORT 2

Detecting and Preventing Fraud in the Citizenship Program

OAG

Office of the Auditor General of Canada
Bureau du vérificateur général du 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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Introduction

Background

Canadian citizenship

2.1   Immigration, Refugees and Citizenship Canada, formerly called Citizenship and Immigration Canada, is responsible for making sure that every person who is granted citizenship meets the eligibility requirements of the *Citizenship Act*. In 2014, more than 260,000 people became Canadian citizens—more than during any year in Canada's history, and more than twice the 2013 number.

2.2   To apply for citizenship, generally applicants must be permanent residents. They must also meet criteria that include minimum time lived in Canada, knowledge of an official language, knowledge of Canada, and more. They must also be free of any **criminal prohibitions**.

2.3   Verifying that applications are not fraudulent is a key activity when assessing eligibility for citizenship. Immigration, Refugees and Citizenship Canada reports that it must continually adjust its systems to combat new types of **fraud** in its programs. The impact of fraud in the Citizenship Program is that some people receive citizenship and all its associated benefits without being entitled to them. Also, once citizenship has been granted, revoking it—if fraud is discovered later—is time-consuming and costly. The Department reported that in January 2016, it had about 700 revocation cases pending.

2.4   The three most common reasons for revoking citizenship are fraud related to residency, identity, or undeclared criminal proceedings. Residency fraud involves pretending to live in Canada to maintain permanent resident status and meet residency requirements for citizenship. In 2012, the Department issued a public warning that nearly 11,000 individuals had been linked to residency fraud investigations.

Focus of the audit

2.5   This audit examined whether Immigration, Refugees and Citizenship Canada detected and prevented fraud in adult citizenship applications to ensure that only applicants who met selected eligibility requirements were granted Canadian citizenship.

Criminal prohibitions—Circumstances involving crime that can preclude someone from obtaining citizenship. Examples include being in jail, on parole, or on probation; having previous convictions; or facing certain charges.

Fraud—False representation or knowing concealment of material circumstances, including making false claims about residency, altering documents, or failing to provide details about a criminal record. Although these activities carry different legal definitions, this report uses the term "fraud" to encompass all of them.

2.6   Our audit focused on the following *Citizenship Act* eligibility requirements for adult citizenship applicants:

- The applicant met the Citizenship Program's residency requirements.
- The applicant had no criminal prohibitions.
- The applicant was a permanent resident of Canada.

2.7   We examined

- selected controls for detecting and preventing fraud in the Citizenship Program;
- how the Department identified fraud risks; and
- how and whether the Department monitored and analyzed the effectiveness of its fraud controls, and adjusted accordingly.

2.8   We also examined whether the Citizenship Program obtained accurate, complete, and timely information from the Royal Canadian Mounted Police and the Canada Border Services Agency to inform its decisions to grant citizenship.

2.9   We did not examine the process to determine permanent resident status or how Immigration, Refugees and Citizenship Canada managed the eligibility requirements for citizenship related to language or knowledge of Canada.

2.10   More details about the audit objective, scope, approach, and criteria are in **About the Audit** at the end of this report (see pages 20–23).

Findings, Recommendations, and Responses

Detecting and preventing fraud

Overall finding   ➡   2.11   Overall, we found that Immigration, Refugees and Citizenship Canada was not adequately detecting and preventing fraud in the Citizenship Program. The Department did not have a systematic method of identifying and documenting fraud risks in the Citizenship Program and did not verify that the measures it implemented to detect and prevent fraud were working as intended. We found that some important controls designed to help citizenship officers identify and act on fraud risks were not consistently applied. We also found that the Department was not reliably receiving from its partners—the Royal Canadian Mounted Police (RCMP) and the Canada Border Services Agency—important information on criminal charges and potential residency fraud that citizenship officers need to make informed decisions about granting citizenship.

2.12   These findings are important because failing to carry out essential steps, such as obtaining necessary information and conducting adequate analysis, creates gaps in the process that make it easier for people to obtain citizenship when they may not be eligible. Since revoking citizenship after it has been granted is costly, while the cost to grant it is far less, it is important to ensure that only eligible applicants receive it in the first place.

Context

2.13   There are many benefits of Canadian citizenship (Exhibit 2.1). It is important to be sure that only those who meet the eligibility requirements of the *Citizenship Act* are granted citizenship. In recent years, Immigration, Refugees and Citizenship Canada has implemented a number of measures aimed at better detecting and preventing fraud in its programs, including the Citizenship Program. For example, in 2010, the Department developed a Citizenship Fraud Action Plan. In 2011, it adopted a Program Integrity Framework with the goal of fully integrating risk management, quality assurance, and fraud deterrence and detection into its day-to-day operations. Parliament has also changed the *Citizenship Act* to include stronger penalties for fraud.

Exhibit 2.1 Canadian citizenship provides a number of benefits

International mobility
- Few visas needed to visit other countries
- No restrictions on entering or leaving Canada

Access to Canadian rights and privileges
- Eligibility to vote
- Eligibility for consular assistance overseas
- No risk of deportation

Financial benefits*
- Health care and other social benefits
- Post-secondary education at Canadian rates
- Easier access to certain Canadian jobs

* Some of the financial benefits are also available to permanent residents.

Immigration, Refugees and Citizenship Canada did not consistently apply controls for detecting and preventing fraud

What we found

2.14   We found that Immigration, Refugees and Citizenship Canada did not consistently apply its own methods to identify and prevent fraud during the citizenship application process. As a result, people were granted citizenship based on incomplete information or without all of the necessary checks being done.

2.15   Our analysis supporting this finding presents what we examined and discusses

- checking for problem addresses,
- identifying fraudulent and altered documents,
- obtaining information from the RCMP about criminal behaviour, and
- obtaining information from the Canada Border Services Agency about potential immigration fraud.

Why this finding matters

2.16   This finding matters because ineligible individuals may obtain Canadian citizenship and receive benefits to which they are not entitled. Revoking citizenship that should not have been granted takes significant time and money.

Recommendations

2.17   Our recommendations in this area of examination appear at paragraphs 2.22, 2.28, 2.37, and 2.42.
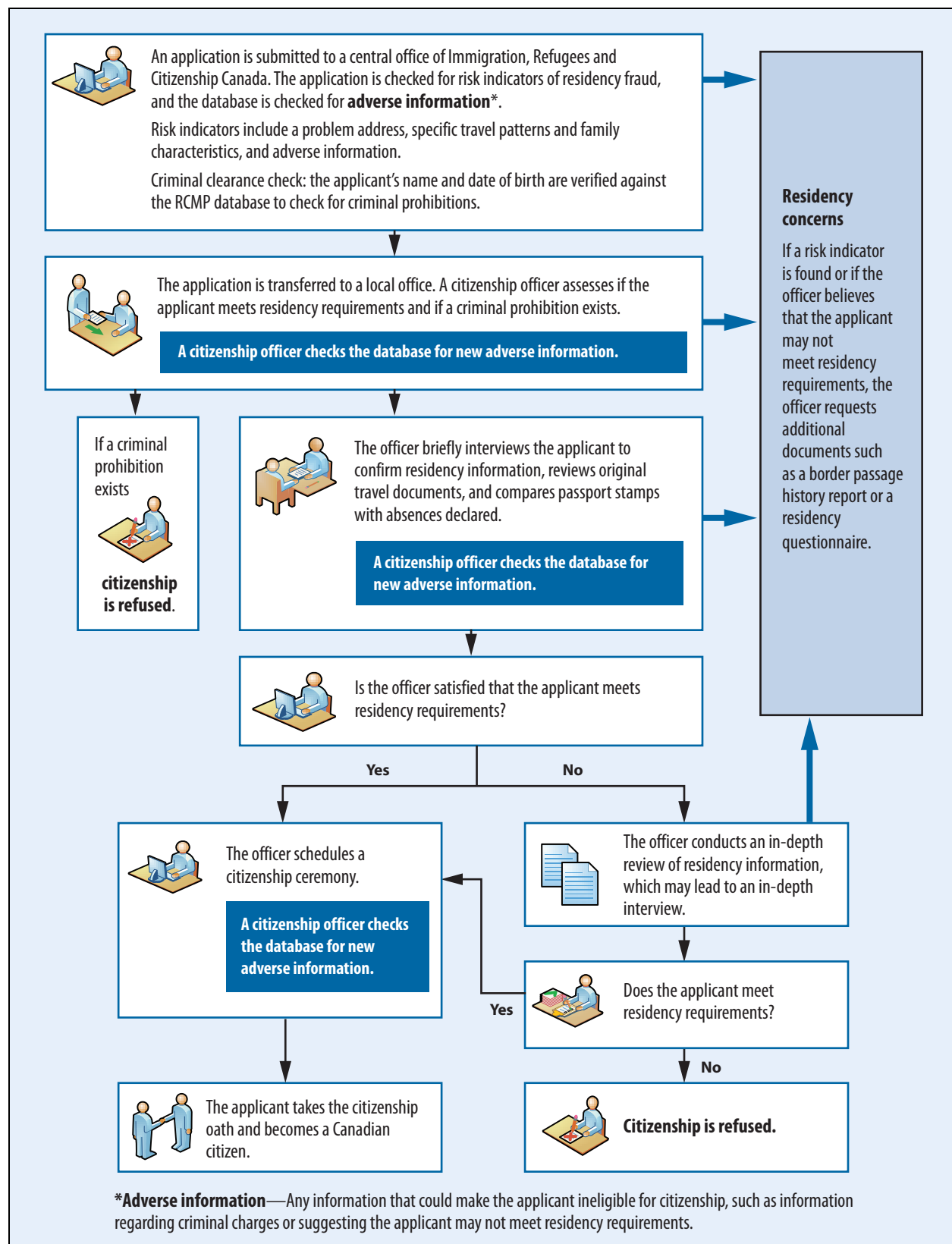
Analysis to support this finding

2.18   **What we examined.** We examined whether Immigration, Refugees and Citizenship Canada and its partners—the Canada Border Services Agency and the Royal Canadian Mounted Police—adequately implemented selected key controls in the citizenship application process intended to identify potential fraud (Exhibit 2.2). Specifically, we examined the Department's processes for checking problem addresses, identifying fraudulent documents, and confirming that applicants have no criminal prohibitions and are not associated with ongoing fraud investigations.

2.19   **Checking for problem addresses.** To meet residency requirements for their citizenship applications, individuals sometimes use an address that is known or suspected to be associated with fraud. The Department refers to these as "problem addresses." When a new applicant presents a problem address, it should raise a red flag in the Department's database (called the **Global Case Management System**, or GCMS).

Global Case Management System—The database used by Immigration, Refugees and Citizenship Canada to process applications for citizenship and immigration services. It stores information that includes, but is not limited to, family name and given names, gender, date of birth, country of birth, contact information, and educational and employment information.

Exhibit 2.2 The citizenship application process involves several checks to detect potential residency fraud and criminal prohibitions

An application is submitted to a central office of Immigration, Refugees and Citizenship Canada. The application is checked for risk indicators of residency fraud, and the database is checked for **adverse information***.

Risk indicators include a problem address, specific travel patterns and family characteristics, and adverse information.

Criminal clearance check: the applicant's name and date of birth are verified against the RCMP database to check for criminal prohibitions.

The application is transferred to a local office. A citizenship officer assesses if the applicant meets residency requirements and if a criminal prohibition exists.

A citizenship officer checks the database for new adverse information.

If a criminal prohibition exists **citizenship is refused**.

The officer briefly interviews the applicant to confirm residency information, reviews original travel documents, and compares passport stamps with absences declared.

A citizenship officer checks the database for new adverse information.

Is the officer satisfied that the applicant meets residency requirements?

Yes · **No**

The officer schedules a citizenship ceremony.

A citizenship officer checks the database for new adverse information.

The officer conducts an in-depth review of residency information, which may lead to an in-depth interview.

Yes — Does the applicant meet residency requirements?

No

The applicant takes the citizenship oath and becomes a Canadian citizen.

Citizenship is refused.

Residency concerns

If a risk indicator is found or if the officer believes that the applicant may not meet residency requirements, the officer requests additional documents such as a border passage history report or a residency questionnaire.

***Adverse information**—Any information that could make the applicant ineligible for citizenship, such as information regarding criminal charges or suggesting the applicant may not meet residency requirements.

2.20   We found that citizenship officers did not consistently have information about problem addresses to support their decisions to grant citizenship. This was due to database factors, such as data entry errors and inconsistent updating (Exhibit 2.3). When the database does not identify problem addresses due to data entry or updating errors, citizenship officers may not detect potentially fraudulent residency claims.

Exhibit 2.3 Immigration, Refugees and Citizenship Canada's database does not adequately detect problem addresses

Issue	What we examined and what we found
Inconsistent, incomplete data entry When addresses are entered inconsistently—for example, by misspelling or not capitalizing the street name—multiple variations of an address may be created in the system. Some will not be identified as problematic when they should be. When addresses are entered incompletely—for example, if apartment numbers are not recorded—problem addresses will not be identified as such.	To test whether addresses identified as problematic by the Department were flagged as such in the database, we examined the addresses of 9,778 of the 106,271 adults who had submitted citizenship applications in 2014 and had been granted citizenship by June 2015. We compared the addresses entered in the Global Case Management System (GCMS) with the Department's list of problem addresses. Six of the individuals had addresses that GCMS correctly identified as problematic. We were able to find 6 more individuals with problem addresses that were not flagged in GCMS. Because citizenship officers did not know that the applicants' addresses might be a problem, they did not ask for additional information to confirm that the applicants met the residency requirement for citizenship before granting them citizenship. To test how frequently data entry errors occurred, we examined 150 of the addresses for the 9,778 applicants. We found that 102 addresses had multiple entries in the system because of variations in how they had been entered. One address had 13 different versions. This increases the risk that problem addresses will not be correctly flagged as such in GCMS.
Inconsistent updating To be effective, the list of problem addresses in GCMS must be updated regularly.	We selected two recent Canada Border Services Agency fraud investigations, obtained the list of problem addresses related to them, and checked whether they had been flagged in GCMS. We found that GCMS was not updated consistently. For example: • In one of the Agency's investigations, 16 different individuals had used 2 addresses, but the Agency had not provided this information to the Department. Half of these individuals received citizenship while the Agency's investigation was in progress. • A second investigation by the Agency linked 21 problem addresses to multiple individuals. Three of these addresses had not been added to the Department's list of problem addresses. We also reviewed documentation provided to the Department by the RCMP to see if the Department updated its list based on this information. We found an example where the RCMP provided the Department with a list of 8 problem addresses linked to a residency fraud investigation, but only 1 address was ever added to the Department's list of problem addresses and flagged in the database. Of the 7 remaining addresses, 3 applicants had used 1 of them, and had been granted citizenship after the information was provided to the Department.

2.21   When an address is flagged as problematic in the database, citizenship officers should carry out additional procedures, such as requesting more evidence to confirm that the applicant meets residency requirements. Citizenship officers are also instructed to check GCMS to see whether an applicant is using an address that has been used by multiple clients during overlapping periods of time. When they find such cases, they are instructed to inform headquarters so that the problem address list can be updated. We found that when information was available in the database, citizenship officers did not consistently act on it (Exhibit 2.4).

Exhibit 2.4 Citizenship officers sometimes did not act when information on problem addresses was available in the database

Issue	What we examined and what we found
Inconsistent follow-up on addresses identified as problematic in the database	We selected all individuals who had submitted citizenship applications after May 2012 and had been granted citizenship by June 2015. We examined all cases where the individual had used an address that was flagged as problematic in the Global Case Management System (GCMS) to see whether citizenship officers carried out the additional procedures required in these circumstances. The total population was 49. In 18 of the 49 cases, citizenship officers did not request additional evidence as required to verify whether the applicant met residency requirements.
Inconsistent identification of multiple applicants using the same address	Using the Department's list of problem addresses, we checked the database to see whether multiple applicants had used the same address during overlapping time periods. We found that officials working in local offices regularly identified problem addresses and forwarded them to Department headquarters. However, we also found examples where many applicants used the same addresses over several years although none of the citizenship officers who processed their applications noticed. For example, one address was used by at least 50 different applicants during overlapping time periods between 2008 and 2015. Among these applicants, 7 became Canadian citizens. This address was eventually discovered in 2015 during a residency fraud investigation by the Canada Border Services Agency and added to the Department's list of problem addresses.

2.22 **Recommendation.** Immigration, Refugees and Citizenship Canada should improve its processes to enter and update problem addresses so they can be identified more reliably, and should establish quality control procedures to make sure citizenship officers implement these processes effectively and consistently.

The Department's response. Agreed. Immigration, Refugees and Citizenship Canada is committed to ensuring integrity in the Citizenship Program. The Department has already implemented measures to strengthen processes to better flag addresses in its Global Case Management System that have been, or are suspected of being, associated with fraud, so that applications with these addresses receive closer scrutiny. It is important to note that identifying suspect addresses is one of many controls in place to prevent fraud, and complements other fraud controls, such as border passage history checks to view applicants' travel entries to Canada and in-person interviews with all clients, where citizenship officers review original documents to verify whether applicants meet requirements. The Department has provided updated guidance to citizenship officers on identifying, entering, and updating problematic addresses in its Global Case Management System so that these problem addresses can be identified more reliably and appropriate action taken. The Department has established quality control procedures and will undertake a quality control exercise in September 2016 to verify that these processes are being followed.

2.23 **Identifying fraudulent and altered documents.** Altering passports and other documents is used by some individuals to simulate residency in Canada to meet residency requirements for citizenship. For example, individuals may change passport or visa stamps to reflect shorter or fewer trips so the number of days they are shown to have been present in Canada corresponds with the citizenship requirements. The Department has identified counterfeit documents as a growing risk to the integrity of its programs. We examined how the Citizenship Program detected fraudulent and altered documents.

2.24 We observed inconsistent practices for dealing with suspicious documents. In one region, no documents suspected to be fraudulent have been seized for in-depth analysis since at least 2010; in another, citizenship officers seized problem documents and submitted them to the Canada Border Services Agency for detailed examination.

2.25 We found that the Department's guidance to citizenship officers for dealing with documents they suspect to be fraudulent was ambiguous and may have contributed to this inconsistency. As of June 2015, the Department instructed citizenship officers who suspected fraud to contact someone authorized to seize documents for further inspection, such as an Agency officer. If no Agency officer was available, citizenship officers were instructed to "keep" the document for further review. The guidance did not explain the difference between "keeping" and "seizing" a document,

nor did it clearly define which persons were authorized to seize documents. While the *Immigration and Refugee Protection Act* explicitly gives immigration and Agency officers the authority to seize documents, there is no similar provision in the *Citizenship Act* to give officers the authority to seize documents during the citizenship application process.

2.26 We also found that citizenship officers did not check travel documents against the Lost, Stolen and Fraudulent Document database, as instructed by departmental guidance. The database contains information about known lost, stolen, and fraudulent travel documents.

2.27 Because of gaps in the Department's processes for detecting fraudulent documents, individuals using such documents may not be caught or charged. When this happens, fraudulent documents may continue to circulate and ineligible applicants may obtain citizenship.

2.28 **Recommendation.** Immigration, Refugees and Citizenship Canada should clarify citizenship officers' authority to seize problem documents, provide officers with more detailed guidance and training, and ensure that officers implement this guidance.

The Department's response. Agreed. Immigration, Refugees and Citizenship Canada recognizes the importance of identifying and seizing fraudulent documents to remove them from circulation. The Department has since clarified the authorities related to document seizure, and has provided detailed guidance to officers regarding the process to seize suspicious documents. In addition, Bill C-6, An Act to Amend the Citizenship Act and to make consequential amendments to another Act, *which was introduced in Parliament on 25 February 2016, contains amendments that would provide new authorities for the seizure of documents where there are reasonable grounds to believe that they were fraudulently or improperly obtained or used or that the measure is necessary to prevent their fraudulent or improper use. Recent changes to the Global Case Management System have provided citizenship officers with access to the Lost, Stolen and Fraudulent Document database. Detailed guidance has been provided to officers on using the database.*

The Department is actively establishing a standard approach to training citizenship officers on the detection of fraudulent documents, which will be implemented in September 2016. The Department will also introduce a process to track the seizure of fraudulent documents by September 2016 and verify that officers are implementing the guidance on seizures by March 2017.

2.29 **Obtaining information from the RCMP about criminal behaviour.** To be eligible for citizenship, an applicant cannot have been convicted of certain offences, be in jail, or be on probation. All citizenship applicants over 15.5 years of age must undergo a criminal clearance check by the RCMP. Following this check, Immigration, Refugees and Citizenship Canada requires applicants to self-report any new criminal

charges before taking the oath. Citizenship officers check the Global Case Management System (GCMS) to see whether the RCMP has reported any new charges against the applicant at any point in the process. The RCMP and the Department have a memorandum of understanding for sharing information.
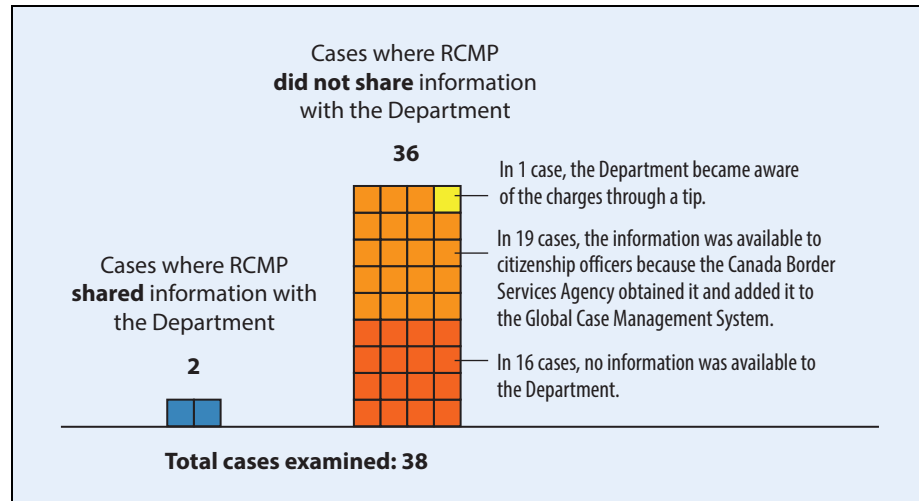
2.30   We examined whether the Citizenship Program obtained accurate, complete, and timely information from the RCMP to make informed decisions when granting citizenship. We looked at two processes: criminal clearance screening, and the process for sharing information when the RCMP charges a permanent resident or foreign national with a crime. We focused on the information exchange between the Citizenship Program and the RCMP. We did not examine the quality of the databases from which the RCMP obtained the information it shared.

2.31   The criminal clearance process begins when a citizenship officer requests a clearance check from the RCMP at the start of the application process. The RCMP checks a national database that includes information from police forces across the country, verifies whether the applicant has a criminal record, and shares this information with the citizenship officer. Once completed, this clearance remains valid for 18 months. We found that the criminal clearance process generally worked well.

2.32   Under the memorandum of understanding, the RCMP has committed to share specific information about criminal charges against permanent residents and foreign nationals with Immigration, Refugees and Citizenship Canada. This information helps the Department confirm applicants' eligibility for citizenship.

2.33   We examined whether the RCMP provided the Department with complete and timely information about criminal charges it brought against permanent residents and foreign nationals. Because the RCMP does not systematically track people's citizenship status, we could not look at citizenship applicants and then search for those charged with crimes. Instead, we started with the RCMP's occurrence database and searched for all criminal occurrences that included the keywords "permanent resident" and "foreign national." We obtained a list of 2,576 criminal occurrences that had taken place since 2010 that contained these terms. We selected 38 cases where these individuals had been charged by the RCMP with a crime, some serious enough to make an individual ineligible for citizenship, such as drug trafficking and assault. We examined whether the RCMP shared this information with citizenship officers in a timely way so they could make informed decisions. We found that the RCMP shared the required information in only 2 of the 38 cases we examined (Exhibit 2.5).

Exhibit 2.5 The RCMP did not share information about criminal charges with Immigration, Refugees and Citizenship Canada in most cases we examined

Cases where RCMP
did not share information
with the Department

36

In 1 case, the Department became aware
of the charges through a tip.

In 19 cases, the information was available to
citizenship officers because the Canada Border
Services Agency obtained it and added it to
the Global Case Management System.

In 16 cases, no information was available to
the Department.

Cases where RCMP
shared information with
the Department

2

Total cases examined: 38

2.34   Individuals were seeking citizenship in 4 of the 36 cases we examined where the RCMP did not share information about criminal charges with Immigration, Refugees and Citizenship Canada. Since the criminal charges occurred after the criminal clearance process, citizenship officers had incomplete information about the applicants when the time came to grant citizenship. In 3 of these cases, the Department had no information about the criminal charges; the outcome was that 2 applicants received citizenship and a third who might have received it did not, due to failing the test on knowledge of Canada. The fourth, one of the 19 cases where information was added to GCMS by the Canada Border Services Agency, abandoned the application. A key reason for the observed gaps in sharing information about criminal charges against permanent residents and foreign nationals is that the RCMP and the Department have not established a process by which to share this information, as is required by their memorandum of understanding. Officers in both departments were not clear on what information they needed to share or when and how to share it. As a result, the process for sharing information on charges against permanent residents and foreign nationals was ad hoc and ineffective.

2.35   Once the initial criminal clearance check is completed (very early in the citizenship application process), the Citizenship Program has no systematic way of obtaining information on criminal charges directly from police forces other than the RCMP. This means that if an applicant is criminally charged after passing the criminal clearance check, citizenship officers may never find out. While reviewing 42 revocation cases, we found that 7 individuals who had been charged with a crime by a police force other than the RCMP had not self-reported the charges, and had obtained

citizenship. Completing the criminal clearance check at a later stage in the application process may help reduce the risk that individuals with criminal prohibitions will be granted citizenship.

2.36   We also found that sometimes when citizenship officers did have access to information on criminal prohibitions in the GCMS, they did not act on it. We obtained all cases in which an individual's citizenship was being revoked due to criminality. These individuals had been granted citizenship since 2011. We checked the database to see whether information about criminal charges was available to citizenship officers when they made the decision to grant citizenship. We found four cases in which information about criminal charges was available in GCMS, but had not been acted upon by citizenship officers. As a result, it is clear that some individuals have received Canadian citizenship even though criminal prohibitions should have made them ineligible.

2.37   **Recommendation.** Immigration, Refugees and Citizenship Canada and the RCMP should revise their procedures to clarify how and when to share information on criminal charges against permanent residents and foreign nationals, and should review the optimal timing of the criminal clearance process.

The Department's response. Agreed. Immigration, Refugees and Citizenship Canada has engaged the RCMP to review the optimal timing for conducting criminal clearance, while bearing in mind the need to process citizenship applications in a timely manner. The Department has also engaged the RCMP to clarify processes for sharing information about criminal charges that impact citizenship applicants after the initial clearance. This will be completed by 31 December 2016.

The RCMP's response. Agreed. The RCMP will work with Immigration, Refugees and Citizenship Canada to address this recommendation. As a first step, the RCMP will examine the appropriate timing for the criminal clearance check during the citizenship application process. In addition, the RCMP will explore how and when the RCMP should share information about criminal charges against permanent residents and foreign nationals. This will involve examining relevant policy, including the existing memorandum of understanding between the Department and the RCMP. This will be completed by 31 December 2016.

2.38   **Obtaining information from the Canada Border Services Agency about potential immigration fraud.** Operating under the authority of the *Immigration and Refugee Protection Act*, the Agency carries out a number of activities that support the Citizenship Program. The relationship, including information sharing between the two departments, is governed by a memorandum of understanding. The Agency supports Immigration, Refugees and Citizenship Canada by
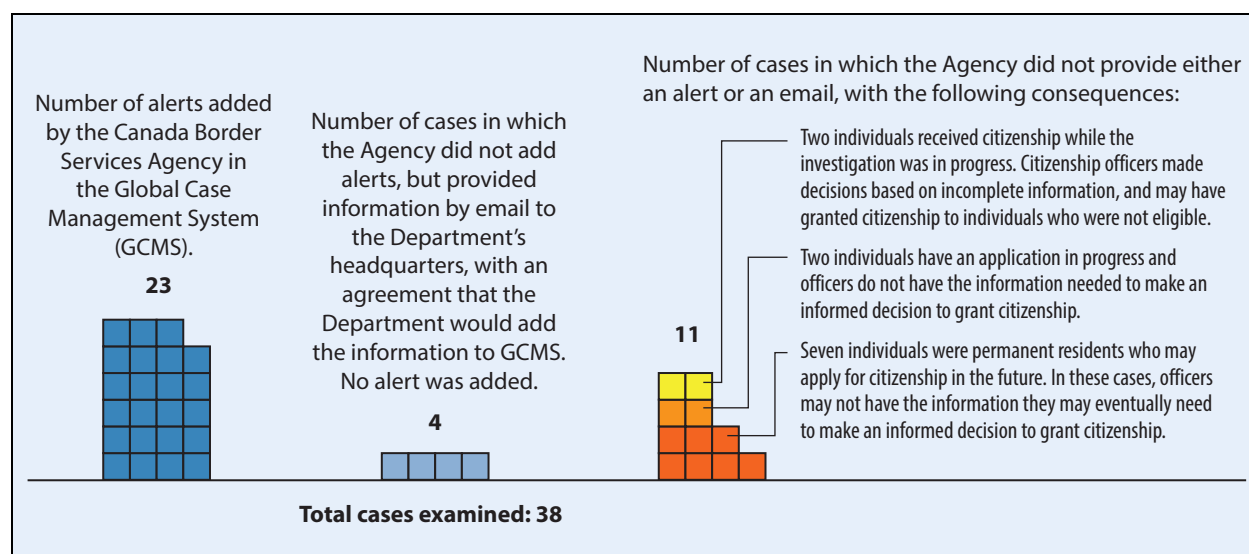
- verifying if an applicant meets the residency requirement of the permanent resident program,

- informing the Citizenship Program if an applicant is undergoing enforcement action that might make him or her ineligible for citizenship, and

- leading investigations of immigration fraud—such as fraud related to residency or marriages of convenience—and sharing information with the Department's immigration and citizenship programs.

2.39   The Agency's enforcement manual states that if officers obtain adverse information that might affect a permanent resident's eligibility for citizenship, it has a responsibility to advise Immigration, Refugees and Citizenship Canada. Agency officers are required to add this information as an "alert" in the individual's Global Case Management System (GCMS) file. Citizenship officers are required to check GCMS to see if there are any alerts in the system; if so, the officers may decide to carry out additional procedures to make sure the applicant's residency requirements have been met before granting citizenship.

2.40   We examined whether the Citizenship Program obtained accurate, complete, and timely information from the Agency to make informed decisions when granting citizenship. We selected a random sample of 38 names out of 4,001 that were associated with seven recent Agency fraud investigations to determine whether the Agency updated GCMS as required to inform the Department that these individuals were associated with investigations. We found that the Agency did not consistently provide information to the Department when permanent residents were linked to major fraud investigations (Exhibit 2.6).

Exhibit 2.6 **The Canada Border Services Agency did not consistently add alerts to the Global Case Management System to inform citizenship officers when someone was linked to a major fraud investigation**

Number of alerts added by the Canada Border Services Agency in the Global Case Management System (GCMS).
23

Number of cases in which the Agency did not add alerts, but provided information by email to the Department's headquarters, with an agreement that the Department would add the information to GCMS. No alert was added.
4

Number of cases in which the Agency did not provide either an alert or an email, with the following consequences:
11

Two individuals received citizenship while the investigation was in progress. Citizenship officers made decisions based on incomplete information, and may have granted citizenship to individuals who were not eligible.

Two individuals have an application in progress and officers do not have the information needed to make an informed decision to grant citizenship.

Seven individuals were permanent residents who may apply for citizenship in the future. In these cases, officers may not have the information they may eventually need to make an informed decision to grant citizenship.

Total cases examined: 38

2.41   In the 23 cases in which the Agency provided information to citizenship officers, it did not always do so in a timely way—sometimes the information was shared one or two years after the investigation had been opened. Officials reported that one reason for this delay is that sharing information too early can compromise an investigation. Another possible reason for the observed gaps is that the Department and the Agency have not established a process that sets out when, what, or how information should be shared. Without specific procedures to follow, Agency officers used their own judgment based on the circumstances of the case. As a result, information sharing was inconsistent, and citizenship officers often lacked important information when assessing an individual's eligibility for Canadian citizenship.

2.42   **Recommendation.** Immigration, Refugees and Citizenship Canada and the Canada Border Services Agency should improve information sharing to ensure that individuals linked to fraud investigations are subject to additional review to confirm their eligibility for citizenship.

The Department's response. Agreed. Immigration, Refugees and Citizenship Canada has taken active steps to ensure that information on individuals who are linked to immigration fraud be communicated to the Citizenship Program in a consistent and timely manner so it can be used in the eligibility process for citizenship. Immigration, Refugees and Citizenship Canada and the Canada Border Services Agency have clarified the legislative authorities supporting the information sharing needed by the Department to make Citizenship Act *eligibility decisions. The organizations are collaborating to establish clear processes and procedures to ensure the Department receives timely information about fraud investigations. The new processes will be in place by December 2016.*

The Agency's response. Agreed. The Canada Border Services Agency recognizes the need to share relevant information on immigration fraud with Immigration, Refugees and Citizenship Canada in a timely and accurate manner—without creating a negative impact on ongoing investigations—to help the Department identify individuals who may not be eligible to become Canadian citizens.

The Agency will conduct an assessment of the information that is needed by Immigration, Refugees and Citizenship Canada for Citizenship Act *eligibility decisions, and of the information on immigration fraud that can be provided by the Agency within the current legislative authorities under the* Immigration and Refugee Protection Act, *given the necessity of protecting the integrity of ongoing investigations, as well as the procedures that are currently in place between the two organizations to share information on immigration fraud. In addition, the Agency will develop a process that establishes when and how Agency officers are expected to share information on immigration fraud with the Department. These measures will be completed by December 2016.*

Immigration, Refugees and Citizenship Canada's management of fraud risks did not meet the expectations of its Program Integrity Framework

What we found

2.43   We found that Immigration, Refugees and Citizenship Canada did not have a rigorous process to identify, understand, or document the nature or scope of fraud risks in the Citizenship Program or how successfully it managed them. As a result, the Citizenship Program could not make informed decisions about which **risk indicators** it should use to detect or prevent residency fraud, nor could it justify its logic or provide a rationale for selecting some of them. Also, the Department did not have an evaluation process in place to verify that its fraud detection and prevention methods worked as intended, making it difficult to adjust them if needed. As a result, the Department could not measure the impact of its efforts to combat fraud.

2.44   Our analysis supporting this finding presents what we examined and discusses

- identifying and analyzing fraud risks and trends, and

- checking the effectiveness of fraud controls and making adjustments.

Why this finding matters

2.45   This finding matters because without an understanding of the extent to which fraud can occur and the best ways to detect it, Immigration, Refugees and Citizenship Canada cannot know whether it is focusing on the right controls, nor can it measure any improvements after introducing new controls. In this situation, it is difficult to make evidence-based decisions about which controls to use or whether any adjustments need to be made. As well, given this lack of understanding, some controls may slow down processing times without adding value.

Recommendations

2.46   Our recommendations in this area of examination appear at paragraphs 2.53, 2.54, and 2.62.

Analysis to support this finding

2.47   **What we examined.** We examined whether the Citizenship Program implemented a risk management approach that was consistent with Immigration, Refugees and Citizenship Canada's risk management policies and procedures and its Program Integrity Framework.

2.48   **Identifying and analyzing fraud risks and trends.** Immigration, Refugees and Citizenship Canada's Program Integrity Framework states that risk management is an ongoing, systematic process of identifying and analyzing risks. This means developing and thoroughly assessing response

Risk indicators—Factors believed to make it more likely that a citizenship application may be fraudulent.

options, putting mitigation measures into action, monitoring their outcomes, and readjusting as needed. We examined whether the Department had a systematic process to identify and analyze risks in its Citizenship Program, including fraud risks.

2.49 We found that the Department identified broad categories of fraud risks, such as residency and document fraud. However, it did not adequately document the information it collected during citizenship application processes to understand the types of fraud it detected or the extent to which they occurred. Without this comprehensive understanding, it is not possible to determine whether a situation improves after mitigation measures are put in place.

2.50 The following are examples of analyses that would be useful to do, but that the Department did not perform.

- Analyze key information to better target fraud control efforts. The Department could identify patterns and improve its understanding of program risks by reviewing revoked, abandoned, or withdrawn citizenship applications.

- Review applications refused for residency reasons. The Department could glean valuable information on changes to the extent of residency fraud, and fraud methods used, by monitoring the number of citizenship applications refused for residency reasons and assessing each case.

2.51 According to the Department's Program Integrity Framework, its programs should identify risk indicators by measuring trends and patterns of program abuse. In 2012, as part of its Citizenship Fraud Action Plan, the Department identified several indicators of residency fraud. As a result of the action plan, citizenship officers have started each citizenship application process by assessing each application against the list of risk indicators. Based on the results, they flag some applications as higher risk, and citizenship officers are expected to conduct further work to make sure these applicants meet the eligibility requirements for citizenship.

2.52 We examined whether Immigration, Refugees and Citizenship Canada's risk indicators for residency fraud were based on sound evidence and analysis, as required by its own policies. We found that the Department documented the risk indicators it considered to be associated with residency fraud, but did not have sufficient data or analysis to explain how or why it selected some of them. The Department provided us with evidence to support its choice of several risk indicators, such as problem addresses and certain employment characteristics. However, we could not determine its rationale for choosing others.

2.53 **Recommendation.** Immigration, Refugees and Citizenship Canada should develop a systematic, evidence-based approach to identifying the risks of fraud, including establishing a baseline and monitoring trends, as required by its Program Integrity Framework.

The Department's response. Agreed. Immigration, Refugees and Citizenship Canada has taken significant steps to prevent and deter fraud in the Citizenship Program. In 2010, the Department implemented a Citizenship Fraud Action Plan to prevent and deter fraud more effectively. The Department developed risk indicators and other fraud-detection tools and established triage criteria to ensure applicants at high risk of committing fraud are subject to closer scrutiny. Legislative changes that came into force in 2015 improved the Department's ability to prevent and respond to fraud. Decision makers in the Citizenship Program are highly attuned to the risks of fraud, and regularly detect and prevent ineligible applicants from obtaining citizenship. As part of its ongoing efforts to improve program integrity, Immigration, Refugees and Citizenship Canada developed a Citizenship Program Integrity Framework in January 2016, which outlines a systematic, evidence-based approach to identifying and managing the risks of fraud in the program, including establishing various baselines and monitoring trends.

2.54   **Recommendation.** Immigration, Refugees and Citizenship Canada should document its rationale for selecting risk indicators for residency fraud, and ensure that these indicators are checked consistently and are effective at detecting and preventing fraud.

The Department's response. Agreed. Immigration, Refugees and Citizenship Canada has improved information management practices by documenting its rationale for any modification to risk indicators. The Department has initiated an analysis of the triage criteria by conducting program integrity activities as part of the Citizenship Program Integrity Framework. As part of the framework, the risk indicators will be evaluated to verify they are consistently applied. The Department will conduct these activities regularly.

2.55   **Checking the effectiveness of fraud controls and making adjustments.** Immigration, Refugees and Citizenship Canada's Program Integrity Framework highlights the importance of conducting quality control exercises and using the results to uncover and measure patterns of program abuse and improve fraud detection and prevention measures. The Department has identified three types of quality control exercises, which it refers to collectively as program integrity exercises:

- quality assurance—to ensure citizenship officers follow procedures and make appropriate decisions;

- quality control—to assess whether documentation meets established standards (for example, whether the issued documents are accurate); and

- targeted anti-fraud activities—to analyze areas where fraud is known or suspected to exist, with a view to quantifying its incidence and developing tools to mitigate or prevent it. An example of an anti-fraud exercise is examining a sample of applications and verifying the accuracy of the information provided by the applicants.

2.56 Our audit tests in the first part of this report showed that Immigration, Refugees and Citizenship Canada did not apply its methods of detecting and preventing fraud during the citizenship application process consistently. These findings highlight the importance of checking whether fraud controls are being consistently applied and are effective at detecting and preventing fraud. We also examined whether the Department assessed the effectiveness of the fraud detection measures it chose to implement and whether it made any adjustments based on the results.

2.57 We found that Immigration, Refugees and Citizenship Canada local offices regularly conducted quality assurance and quality control exercises to ensure citizenship officers were following procedures. However, these exercises were not designed to determine whether fraud controls were applied correctly and working as intended. We found that the Department did not conduct targeted quality assurance or quality control exercises to make sure officers applied key fraud controls correctly. For example, the Department did not conduct random testing—an approach used in its Permanent Resident Program—to see if controls were working. The Department has not conducted targeted anti-fraud tests or activities since 2012.

2.58 We found that the Department has taken some steps to assess the effectiveness of its risk indicators, but that more work is needed. In 2013, the Department ran an exercise to check the effectiveness of the risk indicators it was using to identify higher-risk citizenship applications with regards to residency. However, we found that the sampling methodology it used was not reliable, and that no benchmark was established to measure the effectiveness of the indicators. In the fall of 2015, the Department also conducted some preliminary analysis to guide the development of a strategy to assess its risk indicators.

2.59 Immigration, Refugees and Citizenship Canada created an electronic repository of program integrity exercises and made it available to all Department employees. The Department said this repository would help identify fraud trends. The repository includes more than 250 exercises that have been undertaken since 2007, most of which are quality assurance and quality control exercises to make sure officers are following procedures. The repository includes some information on fraud, such as month-end reports from local offices (which sometimes include notes on confirmed fraud cases). However, the Department has not analyzed the results of these exercises to see whether any adjustments to its fraud controls are needed.

2.60 We noted that Immigration, Refugees and Citizenship Canada had made several recent adjustments to its fraud control measures without having analyzed whether they were being applied correctly or were working as intended. For example, we found that the Department had changed some of the risk indicators for residency fraud without conducting any analysis to determine whether these changes would compromise program integrity,

or whether the applications that presented a higher fraud risk would still be targeted. For example, the Department decided that a risk indicator that identified certain characteristics would apply only when applicants said they had travelled for a certain number of days in a one-year period. It could not produce any evidence that these travel patterns were more often found among applicants who do not meet residency requirements. As a result of these changes, significantly fewer applications were flagged as higher risk and given more in-depth assessment.

2.61   In 2014, Immigration, Refugees and Citizenship Canada made criminal clearances valid for 18 months—up from 12 months—to improve processing efficiency. According to the Department, this would not compromise program integrity, because citizenship officers would still need to check for adverse information at multiple stages in the application process and, therefore, would be able to identify any new criminal charges. But our audit test (paragraphs 2.33 and 2.34) showed that the Department did not consistently obtain the information it needed to determine whether an applicant had been charged with a crime. The conclusion that extending the criminal clearance check would not compromise program integrity does not appear to be supported by evidence.

2.62   **Recommendation.** To ensure continuous improvement in its efforts to detect and prevent fraud, Immigration, Refugees and Citizenship Canada should monitor its fraud controls to ensure they are applied appropriately and are achieving the intended results. The Department should examine the results of its continuous improvement processes regularly and make any needed adjustments to its fraud controls.

The Department's response. Agreed. As part of the Citizenship Program Integrity Framework, Immigration, Refugees and Citizenship Canada has established a process by which fraud controls will be monitored regularly to ensure they are being applied appropriately and achieving the intended results. They will be adjusted as necessary. As well, to ensure continuous improvement in efforts to detect and prevent fraud, the Department created a Citizenship Program Integrity Working Group in August 2015 to disseminate information on emerging fraud trends and best practices for fraud detection and prevention among citizenship offices across the country.

Conclusion

2.63   We concluded that Immigration, Refugees and Citizenship Canada did not adequately detect and prevent fraud to ensure that only applicants who met selected eligibility requirements were granted Canadian citizenship.

About the Audit

The Office of the Auditor General's responsibility was to conduct an independent examination of the Citizenship Program to provide objective information, advice, and assurance to assist Parliament in its scrutiny of the government's management of resources and programs.

All of the audit work in this report was conducted in accordance with the standards for assurance engagements set out by the Chartered Professional Accountants of Canada (CPA) in the CPA Canada 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 in this report are factually based.

Objective

The objective of the audit was to determine whether Immigration, Refugees and Citizenship Canada detected and prevented fraud to ensure that only applicants who met selected eligibility requirements were granted Canadian citizenship.

Scope and approach

To conduct our audit, we

- reviewed Immigration, Refugees and Citizenship Canada's processes to identify fraud risks;
- examined selected control measures that the Department had established to mitigate these risks; and
- examined whether the Department assessed the effectiveness of these controls and made adjustments based on this assessment.

We focused on three *Citizenship Act* eligibility requirements:

- whether the applicant was a permanent resident of Canada,
- whether the applicant met the residency requirements, and
- whether the applicant had criminal prohibitions.

Our audit focused on adult citizenship applications. We did not examine other citizenship lines of business, such as adoptions or proofs of citizenship. We did not examine the process to determine permanent resident status or how Immigration, Refugees and Citizenship Canada managed eligibility requirements for citizenship related to language or knowledge of Canada.

We also examined whether the Citizenship Program obtained accurate, complete, and timely information from the Royal Canadian Mounted Police and the Canada Border Services Agency to make informed decisions about granting citizenship.

We visited selected Immigration, Refugees and Citizenship Canada and Agency sites across Canada and conducted structured interviews with Department, Agency, and RCMP staff, including officers and managers. We also conducted a survey on information-sharing systems and practices that included all 22 local citizenship offices as well as 11 RCMP offices and 7 Agency offices across Canada.

Criteria

Criteria	Sources
To determine whether Immigration, Refugees and Citizenship Canada detected and prevented fraud to ensure that only applicants who met selected eligibility requirements were granted Canadian citizenship, we used the following criteria:	
Immigration, Refugees and Citizenship Canada has an ongoing and systematic process to identify and analyze fraud risks in the Citizenship Program.	• *Citizenship Act* • *Immigration and Refugee Protection Act* • Framework for the Management of Risk, Treasury Board of Canada Secretariat • Guide to Integrated Risk Management, Treasury Board of Canada Secretariat • Policy on Internal Control, Treasury Board • Program Integrity Framework, Immigration, Refugees and Citizenship Canada
Immigration, Refugees and Citizenship Canada designs adequate controls to mitigate fraud risk in the Citizenship Program.	• *Citizenship Act* • Framework for the Management of Risk, Treasury Board of Canada Secretariat • Guide to Integrated Risk Management, Treasury Board of Canada Secretariat • Policy on Internal Control, Treasury Board • Program Integrity Framework, Immigration, Refugees and Citizenship Canada • Policy on Integrated Risk Management, Immigration, Refugees and Citizenship Canada
Immigration, Refugees and Citizenship Canada ensures that citizenship officers apply the fraud controls correctly and consistently.	• *Citizenship Act* • Framework for the Management of Risk, Treasury Board of Canada Secretariat • Guide to Integrated Risk Management, Treasury Board of Canada Secretariat • Policy on Internal Control, Treasury Board • Program Integrity Framework, Immigration, Refugees and Citizenship Canada • Policy on Integrated Risk Management, Immigration, Refugees and Citizenship Canada

Criteria	Sources
To determine whether Immigration, Refugees and Citizenship Canada detected and prevented fraud to ensure that only applicants who met selected eligibility requirements were granted Canadian citizenship, we used the following criteria: (continued)	
Immigration, Refugees and Citizenship Canada's Citizenship Program has accurate, complete, and timely information from the Canada Border Services Agency regarding citizenship applicants so that it can make informed grant decisions.	• *Citizenship Act* • *Immigration and Refugee Protection Act* • *Privacy Act* • Memorandum of Understanding, Immigration, Refugees and Citizenship Canada, and the Canada Border Services Agency, 2011 • Enforcement Manual, Immigration, Refugees and Citizenship Canada • Program Delivery Instructions, Immigration, Refugees and Citizenship Canada
Immigration, Refugees and Citizenship Canada's Citizenship Program has accurate, complete, and timely information from the Royal Canadian Mounted Police regarding citizenship applicants so that it can make informed grant decisions.	• *Citizenship Act* • *Immigration and Refugee Protection Act* • *Privacy Act* • Memorandum of Understanding, Immigration, Refugees and Citizenship Canada, and the Royal Canadian Mounted Police, 2012
Using the results of its fraud control, quality assurance, and monitoring processes, Immigration, Refugees and Citizenship Canada reassesses fraud risk and mitigation, and adjusts its controls accordingly.	• *Citizenship Act* • Framework for the Management of Risk, Treasury Board of Canada Secretariat • Guide to Integrated Risk Management, Treasury Board of Canada Secretariat • Policy on Internal Control, Treasury Board • Program Integrity Framework, Immigration, Refugees and Citizenship Canada • Policy on Integrated Risk Management, Immigration, Refugees and Citizenship Canada

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

Period covered by the audit

The audit covered the period between July 2014 and October 2015. This period was selected to include the Citizenship Program's most current fraud detection systems and practices. When necessary, we also reviewed relevant documentation from earlier years. Audit work for this report was completed on 29 January 2016.

Audit team

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List of Recommendations

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

Recommendation	Response
Detecting and preventing fraud	
2.22 Immigration, Refugees and Citizenship Canada should improve its processes to enter and update problem addresses so they can be identified more reliably, and should establish quality control procedures to make sure citizenship officers implement these processes effectively and consistently. **(2.19–2.21)**	**The Department's response.** Agreed. Immigration, Refugees and Citizenship Canada is committed to ensuring integrity in the Citizenship Program. The Department has already implemented measures to strengthen processes to better flag addresses in its Global Case Management System that have been, or are suspected of being, associated with fraud, so that applications with these addresses receive closer scrutiny. It is important to note that identifying suspect addresses is one of many controls in place to prevent fraud, and complements other fraud controls, such as border passage history checks to view applicants' travel entries to Canada and in-person interviews with all clients, where citizenship officers review original documents to verify whether applicants meet requirements. The Department has provided updated guidance to citizenship officers on identifying, entering, and updating problematic addresses in its Global Case Management System so that these problem addresses can be identified more reliably and appropriate action taken. The Department has established quality control procedures and will undertake a quality control exercise in September 2016 to verify that these processes are being followed.
2.28 Immigration, Refugees and Citizenship Canada should clarify citizenship officers' authority to seize problem documents, provide officers with more detailed guidance and training, and ensure that officers implement this guidance. **(2.23–2.27)**	**The Department's response.** Agreed. Immigration, Refugees and Citizenship Canada recognizes the importance of identifying and seizing fraudulent documents to remove them from circulation. The Department has since clarified the authorities related to document seizure, and has provided detailed guidance to officers regarding the process to seize suspicious documents. In addition, Bill C-6, *An Act to Amend the Citizenship Act and to make consequential amendments to another Act*, which was introduced in Parliament on 25 February 2016, contains amendments that would provide new authorities for the seizure of documents where there are reasonable grounds to believe that they were fraudulently or improperly obtained or used or that the measure is necessary to prevent their fraudulent or improper use. Recent changes to the Global Case Management System have provided citizenship officers with access to the Lost, Stolen and Fraudulent Document database. Detailed guidance has been provided to officers on using the database.

The Department is actively establishing a standard approach to training citizenship officers on the detection of fraudulent documents, which will be implemented in September 2016. The Department will also introduce a process to track the seizure of fraudulent documents by September 2016 and verify that officers are implementing the guidance on seizures by March 2017. |

Recommendation	Response
2.37 Immigration, Refugees and Citizenship Canada and the RCMP should revise their procedures to clarify how and when to share information on criminal charges against permanent residents and foreign nationals, and should review the optimal timing of the criminal clearance process. **(2.29–2.36)**	**The Department's response.** Agreed. Immigration, Refugees and Citizenship Canada has engaged the RCMP to review the optimal timing for conducting criminal clearance, while bearing in mind the need to process citizenship applications in a timely manner. The Department has also engaged the RCMP to clarify processes for sharing information about criminal charges that impact citizenship applicants after the initial clearance. This will be completed by 31 December 2016.

The RCMP's response. Agreed. The RCMP will work with Immigration, Refugees and Citizenship Canada to address this recommendation. As a first step, the RCMP will examine the appropriate timing for the criminal clearance check during the citizenship application process. In addition, the RCMP will explore how and when the RCMP should share information about criminal charges against permanent residents and foreign nationals. This will involve examining relevant policy, including the existing memorandum of understanding between the Department and the RCMP. This will be completed by 31 December 2016. |
| **2.42** Immigration, Refugees and Citizenship Canada and the Canada Border Services Agency should improve information sharing to ensure that individuals linked to fraud investigations are subject to additional review to confirm their eligibility for citizenship. **(2.38–2.41)** | **The Department's response.** Agreed. Immigration, Refugees and Citizenship Canada has taken active steps to ensure that information on individuals who are linked to immigration fraud be communicated to the Citizenship Program in a consistent and timely manner so it can be used in the eligibility process for citizenship. Immigration, Refugees and Citizenship Canada and the Canada Border Services Agency have clarified the legislative authorities supporting the information sharing needed by the Department to make *Citizenship Act* eligibility decisions. The organizations are collaborating to establish clear processes and procedures to ensure the Department receives timely information about fraud investigations. The new processes will be in place by December 2016.

The Agency's response. Agreed. The Canada Border Services Agency recognizes the need to share relevant information on immigration fraud with Immigration, Refugees and Citizenship Canada in a timely and accurate manner—without creating a negative impact on ongoing investigations—to help the Department identify individuals who may not be eligible to become Canadian citizens.

The Agency will conduct an assessment of the information that is needed by Immigration, Refugees and Citizenship Canada for *Citizenship Act* eligibility decisions, and of the information on immigration fraud that can be provided by the Agency within the current legislative authorities under the *Immigration and Refugee Protection Act*, given the necessity of protecting the integrity of ongoing investigations, as well as the procedures that are currently in place between the two organizations to share information on immigration fraud. In addition, the Agency will develop a process that establishes when and how Agency officers are expected to share information on immigration fraud with the Department. These measures will be completed by December 2016. |

Recommendation	Response
2.53 Immigration, Refugees and Citizenship Canada should develop a systematic, evidence-based approach to identifying the risks of fraud, including establishing a baseline and monitoring trends, as required by its Program Integrity Framework. **(2.48–2.52)**	**The Department's response.** Agreed. Immigration, Refugees and Citizenship Canada has taken significant steps to prevent and deter fraud in the Citizenship Program. In 2010, the Department implemented a Citizenship Fraud Action Plan to prevent and deter fraud more effectively. The Department developed risk indicators and other fraud-detection tools and established triage criteria to ensure applicants at high risk of committing fraud are subject to closer scrutiny. Legislative changes that came into force in 2015 improved the Department's ability to prevent and respond to fraud. Decision makers in the Citizenship Program are highly attuned to the risks of fraud, and regularly detect and prevent ineligible applicants from obtaining citizenship. As part of its ongoing efforts to improve program integrity, Immigration, Refugees and Citizenship Canada developed a Citizenship Program Integrity Framework in January 2016, which outlines a systematic, evidence-based approach to identifying and managing the risks of fraud in the program, including establishing various baselines and monitoring trends.
2.54 Immigration, Refugees and Citizenship Canada should document its rationale for selecting risk indicators for residency fraud, and ensure that these indicators are checked consistently and are effective at detecting and preventing fraud. **(2.48–2.52)**	**The Department's response.** Agreed. Immigration, Refugees and Citizenship Canada has improved information management practices by documenting its rationale for any modification to risk indicators. The Department has initiated an analysis of the triage criteria by conducting program integrity activities as part of the Citizenship Program Integrity Framework. As part of the framework, the risk indicators will be evaluated to verify they are consistently applied. The Department will conduct these activities regularly.
2.62 To ensure continuous improvement in its efforts to detect and prevent fraud, Immigration, Refugees and Citizenship Canada should monitor its fraud controls to ensure they are applied appropriately and are achieving the intended results. The Department should examine the results of its continuous improvement processes regularly and make any needed adjustments to its fraud controls. **(2.55–2.61)**	**The Department's response.** Agreed. As part of the Citizenship Program Integrity Framework, Immigration, Refugees and Citizenship Canada has established a process by which fraud controls will be monitored regularly to ensure they are being applied appropriately and achieving the intended results. They will be adjusted as necessary. As well, to ensure continuous improvement in efforts to detect and prevent fraud, the Department created a Citizenship Program Integrity Working Group in August 2015 to disseminate information on emerging fraud trends and best practices for fraud detection and prevention among citizenship offices across the country.