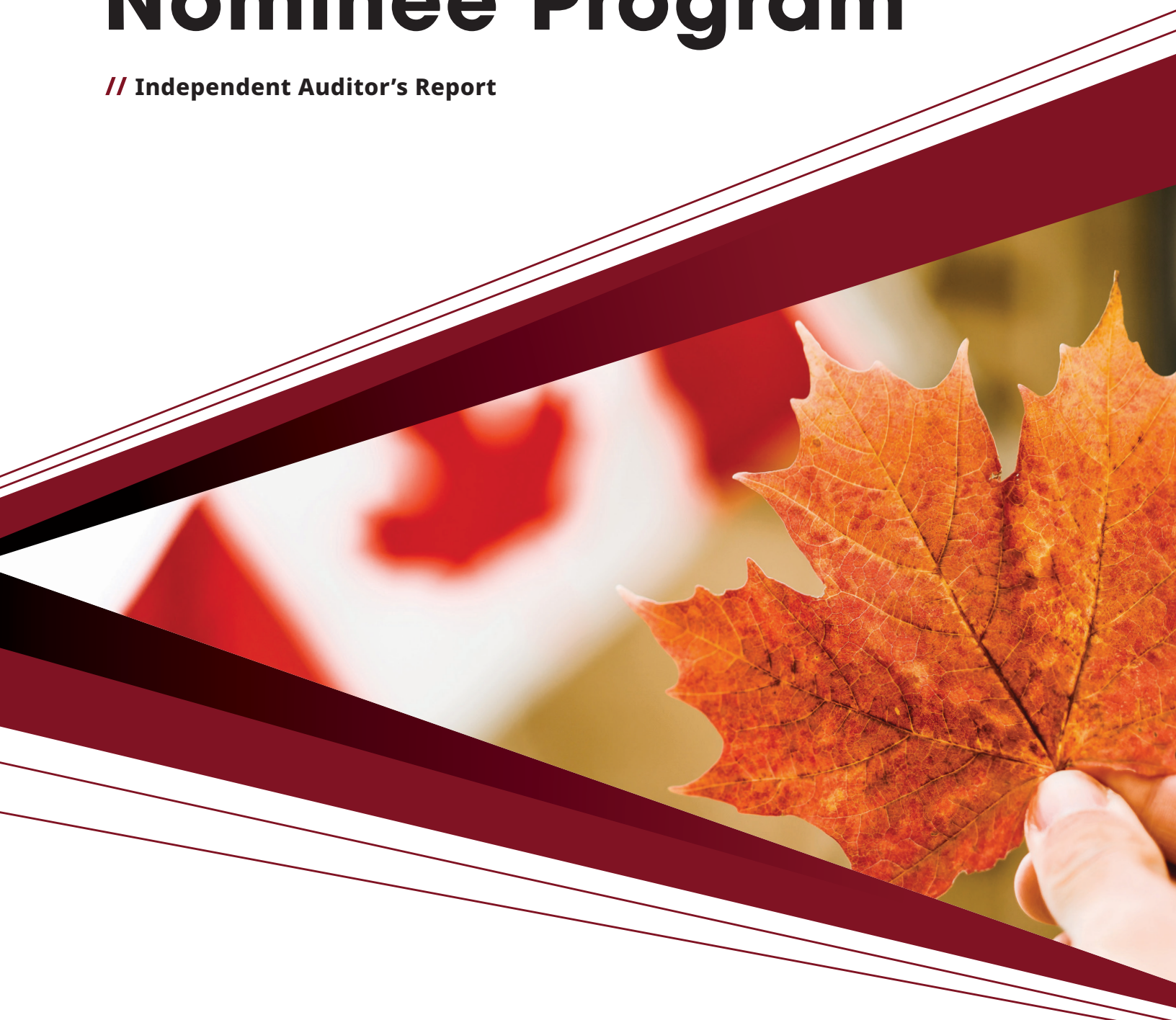


Performance Audit

# Ontario Immigrant Nominee Program

// Independent Auditor's Report



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# 1.0 Audit at a Glance

## // Why We Did This Audit

- Ontario receives more new immigrants than any other province in Canada. Over the past five years (2019–2023), Ontario received 45% of all new immigrants who were granted permanent residency.
- The federal government sets immigration targets and administers all applications for permanent residency. The Ontario Immigrant Nominee Program (OINP) is the primary way for the Province to provide input to the federal government about economic immigration to Ontario. Through the program, Ontario can nominate applicants who have the skills and occupations to meet local needs.
- OINP has grown substantially since the program was last audited by our office in 2014. Between 2022 and 2023, the number of nominees for permanent residency to the federal government increased by almost 70%.

## // Our Conclusion

We found that the Ministry of Labour, Immigration, Training and Skills Development (Ministry) has begun to develop processes to more effectively ensure that applicants have met all requirements for nomination and have not misrepresented information. However, there are several areas in which improvements should be made. We also found that those nominated do not always match the occupations and skills the Province has identified as being in the highest demand, based on the size and growth of reported job vacancies. As well, neither the outcomes for nominees nor their economic benefit to Ontario are effectively measured or reported.

The Ministry has accepted 21 recommendations.

## // What We Found

### **Compared with Other Provinces, Ontario Has Proportionally Less Say in the Economic Immigrants Admitted for Permanent Residency, Highlighting the Need to Co-ordinate with the Federal Government to Meet Provincial Needs**

- In 2023, nominees through the OINP represented 21% of economic immigrants and 10% of total immigrants granted permanent residency in the province that year. This fell significantly behind other provinces whose nominations represented between 42% (British Columbia) and 93% (Saskatchewan) of economic immigrants.
- Given the amount of economic immigration outside of the OINP, it is important that Ontario co-ordinate with the federal government to ensure that the province's labour market needs are considered in granting permanent residency to those not nominated through OINP.
- The federal government (Immigration, Refugees and Citizenship Canada) does not have an arrangement with Ontario or any other province to allow the province to identify labour market priorities, with a focus on occupations that the federal government should consider when it selects economic immigrants.

#### » **Recommendation 1**

### **The Economic Impact of Nominating Individuals Who Do Not Have a Job Offer Has Not Been Assessed**

- As the total number of nominations allocated by the federal government to Ontario has increased, so has the percentage of international graduate nominees. The latter are nominated primarily because they have an Ontario Masters or PhD degree, but they are not required to have a job offer. From 2022 to 2023, there was a 69% increase in the total number of nominations and a 227% increase in the number of nominations for Masters and PhD graduates. In 2023, nominations for Masters or PhD graduates surpassed nominees with a job offer by 3,408 (58%). Compared to five years ago in 2019, nominations in 2023 for Masters and PhD graduates increased 461%, while nominations for the job offer streams decreased 7%.
- According to the Ministry, the increase in the number of nominations for Masters and PhD graduates was because these applications were less risky and complex and required less verification, so they were quicker to process in order to meet the nomination allocation. However, the Ministry has not assessed the economic impact of nominating individuals without a job offer in favour of those who do.

## // What We Found

- From 2021 (the earliest the Ministry collected standardized data) to 2023, 72% of nominees from the Masters and PhD graduate streams came from engineering, computer and information sciences or business, with engineering studies accounting for 43%. Despite health occupations being in great demand and the Ministry making this a priority area, only 8% of Masters and PhD graduate nominees came from a health-related field of study in 2022 and 2023.

### » **Recommendation 3**

#### **Few Nominees Have Jobs or Work Experience in Occupations with the Highest Vacancies**

- The Ministry has not always nominated individuals in the occupations identified by data analysis to be most in need. As of the end of 2023, occupations with the highest vacancies have had little focus through the program. This was most notable for nursing-related occupations in which job vacancies were high: only between 0.3% and 0.9% of all nominations were made in those occupations.
- When determining the top 10 occupations nominated in 2023, we noted the Ministry's nominations largely focused on meeting priority objectives for technology and skilled trades, but these occupations mostly had average future demand as rated by Ministry projections.

### » **Recommendation 4**

#### **Nominees Have Disproportionately Favoured the Greater Toronto Area**

- Although the proportion of nominees with job offers inside and outside the Greater Toronto Area (GTA) is approaching an even split, our analysis showed that for the five-year period 2019–2023, only 37% of job offer nominees intended to settle outside the GTA. We also noted some regions received relatively few nominations; for example, Northern Ontario had only 3% of nominees with job offers. The Ministry does not have an overall strategy toward a needs-based distribution of nominees across the province, and particularly to regions outside of the GTA.
- Our analysis of data obtained from Statistics Canada showed that a high percentage of OINP nominees who gained permanent residency stayed in Ontario, averaging 93% from 2016 to 2020. However, years after arriving, many permanent residents who arrived as OINP nominees migrated to other regions of the province, specifically to the Hamilton-Niagara Peninsula and the Kitchener-Waterloo-Barrie regions. The majority of OINP individuals still resided in the GTA five years after receiving permanent residency (74% of nominees from 2016 to 2021).

## // What We Found

- Over a five-year period ending in 2021, close to 5,000 individuals migrated to Ontario from another provincial nominee program, with 63% moving to the GTA. Only 175 individuals from the OINP moved to other provinces, primarily to Alberta (37%) and British Columbia (37%), in the same five-year period.
- Although the Ministry has conducted some initiatives to encourage nominees to settle in regions outside the GTA, we noted that other provinces have incorporated more aggressive mechanisms into their nominee programs to encourage immigration to less populous areas. For example, the Alberta nominee program includes a dedicated stream that aims to attract and retain newcomers to rural communities with a population under 100,000 outside Calgary and Edmonton, to address labour needs and support economic development.

### » Recommendation 5

#### **To Reduce Potential Misrepresentation, Weaknesses in Application Verification Procedures Need to be Addressed**

- We identified areas where more robust verification processes were needed, particularly where documents are susceptible to misrepresentation or forgery. This included direct verification with the following agencies or institutions:
  - Immigration, Refugees and Citizenship Canada (IRCC) for documents submitted by an applicant in support of their legal status in Canada;
  - Employment and Social Development Canada for the legitimacy of a Labour Market Impact Assessment;
  - Canada Revenue Agency for documents submitted by an applicant in support of their prior work experience in Canada; and
  - the financial institution (directly or through an affidavit) for bank statements and other investment statements provided by an applicant to support required settlement funds.
- Results of inspections pointed to weaknesses in the Ministry's processes and mechanisms to prevent and catch misrepresentation before an application is approved and candidates are nominated. For example, in 67% of cases where inspectors recommended a monetary penalty and/or ban, the program had already approved the applications and nominated the individuals; and 54% of enforcement actions recommended by inspectors in 2022 and 2023 were from public tips, not because the file had been identified by the program's application verification.

## // What We Found

- Although assessment note guidelines were implemented in early 2024, we found areas where the guidelines lacked specifics, resulting in little or no evidence that verification procedures had been completed (for example, to verify open-source Internet searches, to support that a job offer was urgent to the employer's business and to show the applicant's intention to reside in Ontario).
- As part of OINP operating procedures, application processing staff are required to verify that an immigration representative is registered with the College of Immigration and Citizenship Consultants (College). However, from our review of application files in the case management system, there was no indication that this step had been completed in 8% of the files we sampled.

### » Recommendations 6 and 7

#### **Routine Analysis of Application Information to Detect Suspicious Patterns and Potential Misrepresentation Only Began in 2023, 16 Years After the Program Was Established**

- OINP had only recently started to perform some *ad hoc* data analysis in April 2023, including triaging applications associated with program integrity concerns, based on indicators it had identified from reports extracted from the program's case management system. For example, applications referencing the same work experience along with the same immigration representative, or groups of applications associated with problematic employers or immigration representatives, might be flagged for analysis. Prior to April 2023, the Ministry did not perform any such analysis.
- The Ministry was limited in its ability to detect misrepresentation through information analysis. The investigation staff performed and maintained their work outside of the case management system. If inspection information was integrated into the case management system, staff could analyze and filter the data to see if patterns existed that appeared suspicious or information was inconsistent.

### » Recommendation 8

## // What We Found

### The Program Has Not Effectively Used Available Enforcement Measures

- From 2018 through 2021, most inspections took the form of desk audits. During this period, only seven monetary penalty orders were issued, amounting to \$63,000, and eight ban orders, ranging from one to two years for providing falsified documents. For example, the Ministry uncovered a case in which an unauthorized representative was behind an elaborate scheme that used shell companies (fake company created for the purpose of securing nominations) and real companies to manufacture falsified job offers and fabricate work experience in applications submitted to the program.
- In this case, the Ministry found 38 applications with falsified job offers and work experience involving 12 connected companies in the same scheme. At the time of our audit, the Ministry was in the process of issuing bans and administrative monetary penalties to applicants, employers and the representative involved.
- In late 2021, the program began conducting on-site inspections; but as of April 1, 2024, the program had only acted on 13% of the 328 monetary penalties recommended by inspectors, and had issued less than 2% of the 117 program ban orders recommended by inspectors.
- At the time of our audit, the Ministry had not yet charged anyone under the *Ontario Immigration Act, 2015* or *Provincial Offences Act*. The Ministry told us the program was in the process of preparing to charge three parties.

#### » Recommendation 11

### The Ministry Conducted Little Post-Nomination Follow-Up to Verify that Conditions of Nomination Had Been Met

- Post-nomination monitoring is conducted primarily through 'quality assurance file reviews' to assess the effectiveness of program delivery processes and integrity practices. Only three of 14 reviews conducted to date focused on verifying that the conditions of nomination continued to be met, and all three of these focused only on one of the three job offer streams.
- Even though significant issues were found in the few reviews that were done, overall, few files were followed up on, with only 9.7% of nominations reviewed in the one job offer stream examined, or 4.4% of nominations across all three employer job offer streams combined. Examples of significant issues included 49% of nominees sampled in the reviews were not working for the employer or in the approved position of their job offer, and 42% of nominees sampled did not apply for work permits within six months, as required.

## // What We Found

- Ministry guidance from February 2022 states that high-risk files should be flagged and followed up 10 months from the date of approval. However, the post-nomination follow-up work for flagged files had begun 28 months after the operational guidance was established. For some nominees, the follow-up occurred up to 22 months after nomination. Due to the delay in post-nomination follow-up, 25 (40.3%) of flagged nominees had already received their permanent residency, leaving the Ministry no power to revoke its nomination.

### » **Recommendations 14 and 15**

#### **Sharing Information with Other Parties Responsible for Immigration Would Improve Program Integrity**

- The Ministry does not have an information-sharing agreement in place with the College that licenses and regulates representatives authorized to assist applicants and employers with OINP applications. Doing so would establish a process of informing each other of confirmed and suspected cases of misrepresentation by licensed representatives, and allow appropriate actions to be taken by both parties.
- Additionally, as a representative's licence extends across Canada, notifying the College is important to help maintain the integrity of immigration programs in other provinces and territories.
- Although the Ministry does have an information-sharing agreement with IRCC, it could be better leveraged to share information regarding suspected or confirmed cases of misrepresentation on a more regular basis. The agreement does not establish any frequency for the sharing of this information; rather, it is done at the discretion of the IRCC processing officer.

### » **Recommendations 17 and 18**

## // What We Found

### **Program Outcomes and Objectives Are Not Measured**

- The Ministry tracked and reported only one performance measure: the number and percentage of skilled immigrants nominated for permanent residency by the program. The current measure does not assess the Ministry's stated objectives of the program.
- The current focus is on nomination targets, which could encourage unintended behaviours (for example, to prioritize quantity over quality of nominees, or to approve applications with less scrutiny in order to speed up the process).
- Our audit of the program in 2014 had also identified that Ontario's provincial nominee program lacked meaningful performance indicators to measure the outcomes of nominees living in Ontario or to determine if labour market needs were being addressed by the program; but 10 years later, useful measures have still not been established.

#### **» Recommendation 19**



## 2.0 Background

### 2.1 Program Overview

There are many programs through which immigrants can arrive into Ontario, such as job offer programs, family sponsorships and special circumstances (for example, refugee status). They are all administered exclusively by the federal government, except for the Provincial Nominee Program, which gives provinces and territories a way to respond to local economic needs. The Provincial Nominee Program was introduced in all provinces and territories in Canada, excluding Quebec and Nunavut, between 1999 and 2009. Ontario adopted the program in 2007.

The federal *Immigration and Refugee Protection Act* defines three potential classes of immigrants for permanent resident status:

- » Economic-class immigrants are selected on the basis of their potential economic contribution.
- » Family-class immigrants are sponsored by immediate family members who are permanent residents.
- » Refugees are sponsored for entry by the federal government or private groups, or seek asylum in Canada.

Over the last five calendar years (2019–2023), 53% of permanent residents admitted to Ontario were economic immigrants, 25% were family immigrants, 19% were refugees, and 3% were allowed in for humanitarian and compassionate reasons, as shown in **Figure 1**. Immigrants selected through the Provincial Nominee Program are considered economic-class immigrants.

**Figure 1: Permanent Residents Admitted to Ontario, by Category, 2019–2023**

Source of data: Immigration, Refugees and Citizenship Canada

Immigration Category	2019	2020	2021	2022	2023	5-Year Period	
						#	%
<b>Economic</b>	82,145	43,400	118,805	93,350	102,485	<b>440,185</b>	53
<b>Family</b>	42,570	22,230	36,680	46,735	56,120	<b>204,335</b>	25
<b>Refugees</b>	25,520	15,065	36,445	39,055	39,135	<b>155,220</b>	19
<b>Other (Humanitarian)</b>	3,130	2,260	7,345	5,845	9,085	<b>27,665</b>	3
<b>Total</b>	<b>153,365</b>	<b>82,955</b>	<b>199,275</b>	<b>184,985</b>	<b>206,825</b>	<b>827,405</b>	<b>100</b>
<b>Permanent Residents via OINP*</b>	<b>12,340</b>	<b>6,750</b>	<b>11,030</b>	<b>19,220</b>	<b>21,440</b>	<b>70,780</b>	
<b>OINP as a Portion of Economic Immigrants (%)</b>	15	16	9	21	21	16	
<b>OINP as a Portion of Total Immigrants (%)</b>	8	8	6	10	10	9	

\* Permanent residents who applied through OINP are a subset of the economic immigrant category. They are counted at the time permanent residency is granted. Therefore, their number will not equal the number of nominations in any particular year because of the time lag between being nominated and being granted permanent residency.

Established under the *Ontario Immigration Act, 2015*, the OINP is the province's economic immigration selection program aimed at giving foreign workers, entrepreneurs and international students an opportunity to be nominated for permanent residency in Ontario, while also giving Ontario businesses the ability to recruit international talent to offset workforce and labour market needs. The Ministry's objectives for OINP are shown in **Figure 2**.

**Figure 2: Objectives of the Ontario Immigrant Nominee Program**

Source of data: Ministry of Labour, Immigration, Training and Skills Development

- » **Select** economic immigrants who will establish themselves in Ontario;
- » **Help** address Ontario's labour market needs;
- » **Improve** Ontario employers' competitiveness by helping them to access international talent;
- » **Support** business attraction and job-creation in the province;
- » **Help** spread the benefits of immigration to all parts of the province; and
- » **Support** francophone immigration to Ontario.

The roles and responsibilities of Canada and Ontario in relation to the nominee program are set out in the Canada-Ontario Immigration Agreement. The most recent agreement between Canada and Ontario was signed in 2017. According to the agreement:

#### **Ontario is responsible for:**

- » the recruitment and nomination of provincial nominees on the basis of their ability and intention to economically establish and settle in Ontario;
- » the promotion of Ontario's Provincial Nominee Program;
- » the integrity of the program, guarding against fraud or misrepresentation; and
- » performance monitoring and evaluation systems to track the effectiveness of the program.

#### **Canada is responsible for:**

- » ensuring that applicants admitted under the Provincial Nominee Program have met the requirements of the economic class, as provided under federal legislation, and that they are assessed for nomination using criteria designed to determine their eligibility for consideration in the economic class;
- » making the final selection and admissibility decisions and issuing visas; and
- » ensuring that performance monitoring and evaluation systems are in place at the federal level to ensure that the national Provincial Nominee Program continues to meet its economic objectives.

Every year the federal government, through IRCC, allocates a certain number of nominations to each province and territory to provide them with the authority to nominate immigrants for their jurisdictions according to their own criteria.

The Ontario government, through the OINP, assesses applications and nominates candidates for permanent residency. Individuals nominated by the OINP can then apply for permanent residency through IRCC. It is IRCC that makes the final decision on each application and issues permanent residency status to successful applicants.

Ontario receives the largest share of federal nominee allocations of all provinces and territories. This allocation increased from 19% of the national total in 2019 to 27% in 2023. See **Figure 3** for the number of allocations by province or territory in each of the last five years.

In 2023, Ontario was allocated 16,500 nominations, an increase of about 70% over 2022, and was awarded a further 30% increase in its 2024 allocation of 21,500.

Ontario reached its nomination limit in each of at least the last five years, 2019–2023. **Appendix 1** shows the actual nominations issued by streams/intake system in each year from 2019 to 2023.

**Figure 3: Provincial Nominee Allocations Across Canada, 2019–2023\***

Source of data: Ministry of Labour, Immigration, Training and Skills Development

Province/Territory	2019	2020	2021	2022	2023
Ontario	6,650	7,350	8,350	9,750	16,500
Alberta	5,750	6,000	6,000	6,500	9,750
Manitoba	5,750	5,875	6,025	6,325	9,500
British Columbia	6,500	6,500	6,500	7,000	8,000
Saskatchewan	5,750	5,750	5,750	6,000	7,250
Nova Scotia	1,350	1,650	2,100	2,700	3,570
New Brunswick	1,050	1,250	1,515	1,916	3,000
Newfoundland and Labrador	1,050	1,150	1,050	1,100	2,100
Prince Edward Island	850	950	1,010	1,310	1,600
Yukon	250	250	250	300	430
Northwest Territories	250	250	250	250	300
<b>Total</b>	<b>35,200</b>	<b>36,975</b>	<b>38,800</b>	<b>43,151</b>	<b>62,000</b>
<b>Ontario's Share (%)</b>	<b>19</b>	<b>20</b>	<b>22</b>	<b>23</b>	<b>27</b>

\* Due to the time lag between nomination by OINP and the granting of permanent residency by the federal government, the number of nominations in any given year will not match the number of permanent residents admitted that year (**Figure 1**).

## 2.2 Applicant Categories, Streams and Intake Systems

OINP has nine streams or pathways under which candidates may qualify. Streams are organized into three categories, each serving different purposes:

- 1 » The five **Human Capital** streams target individuals who have high human capital (valuable work experience, education, language skills) and who can contribute to Ontario's labour market and economic growth in communities across the province.
- 2 » The three **Employer Job Offer** streams supply international talent to local employers who have labour needs, and help address labour shortages in communities across the province.
- 3 » The **Entrepreneur** stream targets individuals who want to implement a new or existing business in Ontario.

OINP has two intake systems to select applicants. The program uses the federal government's **Express Entry** system to select individuals to apply through three streams (known as Ontario's Express Entry streams). The intake of potential applicants in the remaining six streams is done through the province's **Expression of Interest** system.

The scoring/selection criteria does not include preferential treatment based on race, gender or other factors related to diversity, equity and inclusion. See [Appendix 2](#) for OINP categories, streams and intake systems.

Each stream has its own set of eligibility requirements that applicants must meet before the Ministry nominates them for permanent residency. Eligibility requirements for each stream under the two systems are outlined in [Appendix 3](#), and the flow of an application through the steps of the nomination process under each system is provided in [Appendix 4](#).

OINP selects individuals and invites them to apply for provincial nomination for the various streams throughout the year. These are referred to as draws, which can either be general or targeted. General draws rank all candidates who registered an Expression of Interest or Express Entry profile, while targeted ones rank only those who have more targeted labour market or human capital attributes (for example, specific occupations or sectors such as health or technology).



## 3.0 Audit Objective and Scope

Our audit objective was to assess whether the Ministry of Labour, Immigration, Training and Skills Development has effective processes and systems in place for the OINP to:

- » ensure that only qualified applicants who have skills that align with Ontario's labour market demands are nominated for permanent resident status; and
- » measure whether the program is achieving its expected outcome of nominating candidates who will be of benefit to the economic development of Ontario.

Our audit scope focused on the adequacy and effectiveness of the Ministry's processes for identifying, verifying and nominating potential immigrants to Ontario through the various streams of the OINP, and for ensuring that those with the skills and/or experience that Ontario's economy needs are put forward for permanent residency.

The audit did not include immigration services provided by the federal government or provincial immigration services outside the OINP (for example, those delivered by the Settlement Services Branch to help newcomers and refugees find the services they need to settle in Ontario).

For more details, see our [Audit Criteria](#), [Audit Approach](#) and [Audit Opinion](#).



# 4.0 What We Found

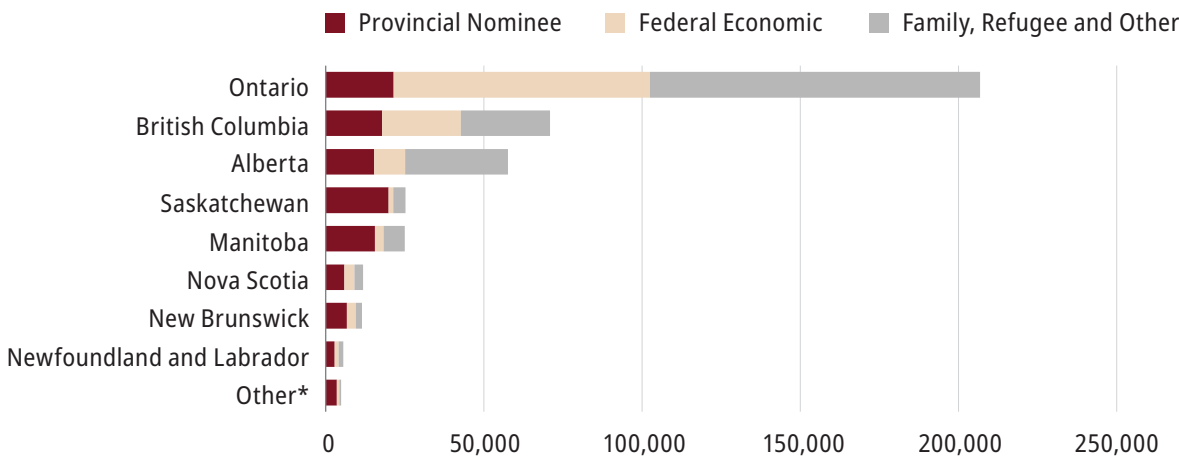
## 4.1 Program Design and Nomination Limits

### 4.1.1 Ontario Has Proportionally Less Say in the Immigrants Admitted for Permanent Residency Than Other Provinces

In 2023, nominees through the OINP represented 21% of economic immigrants and 10% of total immigrants granted permanent residency in the province that year (see **Figure 1**). This falls significantly behind other provinces whose nominations represent between 42% (British Columbia) and 93% (Saskatchewan) of economic immigrants. **Figure 4** shows the number of provincial nominees granted permanent residency compared to economic immigration and total immigration in 2023 for those provinces with a provincial nominee program.

**Figure 4: Total Number of Immigrants, by Province/Territory, 2023**

Source of data: Immigration, Refugees and Citizenship Canada



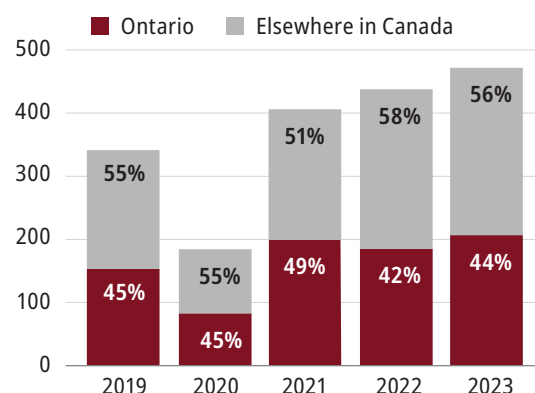
\* Other includes provinces/territories with fewer than 5,000 individuals granted permanent residency: Prince Edward Island (3,620); Yukon (895); and Northwest Territories (325). Quebec and Nunavut do not have provincial nominee programs.

Among all provinces in Canada in each of the past five years, 2019–2023, Ontario had the highest number of new immigrants to be granted permanent residency. In those five years, Canada admitted 1.84 million new permanent residents, with 45% (827,000) going to Ontario. See **Figure 5** for Ontario's share of Canadian immigration in each of the last five years.

Ontario also had more economic class immigrants than any other province or territory in each of the last five years, 2019–2023, and in total for the five-year period (440,185). As was also the case when we last audited this program in 2014, almost all provinces and territories other than Ontario had a higher proportion of their new immigrants from the economic class (rather than family class or refugees), which was intended to help address labour needs and to help grow the economy. Only Alberta and Nunavut had a lower percentage of immigrants from the economic class. For the five years 2019–2023 combined, only 53% of Ontario's new immigrants were from the economic class, compared (for example) to 91% in Prince Edward Island, 75% in Manitoba and 63% in British Columbia. See **Figure 6** for a comparison of the categories of permanent residents admitted by province.

**Figure 5: Percentage of Permanent Residents Admitted to Ontario and Elsewhere in Canada, 2019–2023**

Source of data: Immigration, Refugees and Citizenship Canada



**Figure 6: Categories of Permanent Residents Admitted, by Province, 2019–2023**

Source of data: Immigration, Refugees and Citizenship Canada

Province/Territory	Economic	Sponsored Family	Refugee	Other*	Total	% Economic
Ontario	440,185	204,335	155,220	27,665	827,405	53
British Columbia	177,320	73,170	25,290	4,475	280,255	63
Quebec	144,490	54,575	31,970	6,570	237,605	61
Alberta	100,550	64,965	43,830	3,870	213,215	47
Manitoba	67,840	13,220	8,850	720	90,630	75
Saskatchewan	65,025	9,670	6,180	215	81,090	80
Nova Scotia	35,350	4,360	4,800	235	44,745	79
New Brunswick	29,760	2,240	3,770	110	35,880	83
Newfoundland and Labrador	9,555	1,070	3,040	110	13,775	69
Prince Edward Island	11,495	650	450	45	12,640	91
Yukon	2,035	425	50	5	2,515	81
Northwest Territories	755	360	70	–	1,185	64
Nunavut	70	110	10	–	190	37
<b>Total</b>	<b>1,084,430</b>	<b>429,150</b>	<b>283,530</b>	<b>44,020</b>	<b>1,841,130</b>	

\* The Other category is for humanitarian and compassionate immigration. The immigration system provides a special pathway for individuals who do not meet the usual immigration criteria but have compelling humanitarian or compassionate reasons to stay in Canada. It is designed for exceptional cases that warrant consideration due to hardship or adverse conditions.

#### 4.1.2 Labour Needs Communicated to the Federal Government Are Too Broad to Effectively Guide Immigration Planning

Ontario uses two main mechanisms to communicate its labour needs to the federal government in order to influence planning for economic immigration. These mechanisms include participation in the Forum of Ministers Responsible for Immigration (Forum) and formal request letters to the federal IRCC Minister.

Ontario has advocated for more specific input to guide the federal government in selecting Ontario's economic immigrants (discussed below). At the time of our fieldwork, an arrangement had not been formalized.

The Forum is a federal and provincial/territorial decision-making body with the goal of supporting a flexible, timely and effective immigration system for Canada. Committee members include all provinces and territories with a Provincial Nominee Program. The committee is chaired by the federal IRCC Minister.

The Forum is comprised of decision-making tables at the ministerial, deputy ministerial, assistant deputy ministerial and director general / executive director levels. The members of these tables make decisions about the strategic objectives and related outcomes identified in the Forum's Strategic Plan for Immigration. There are also several working groups to support the planning tables, such as the anti-fraud working group and the immigration planning levels working group.

To determine the extent to which Ontario has communicated its labour market needs to the federal government through the Forum, we reviewed documentation Ontario provided to the working groups, and minutes of working group and table meetings, between 2021 and 2023.

It is evident from the meeting minutes of Forum working groups that the need for collaboration is recognized. For example, topics of discussion at its meeting on November 17, 2023, included solutions to promote complementary federal and provincial/territorial economic selection programs. The Forum also discussed the importance of both federal economic streams and Provincial Nominee Programs to address labour market needs and further support communities currently under-served by economic immigration.

We noted the Ministry provides high-level information, such as industries or sectors where there are labour demands or provincial priorities, but it does not provide enough detailed information, such as specific occupations or regional needs, although the Ministry does have access to this information, as noted in **Sections 4.2.1** and **4.2.2**.

We also reviewed letters the Ministry sent to the federal Minister regarding its allocation requests for the upcoming year. Similar to the solicited feedback Ontario provided to the federal government through the Forum working groups, we also found that the allocation request letters lacked detailed information, such as the specific occupations for each of the in-demand sectors, the number of projected job openings (a combination of new jobs and replacement jobs) in each

of the National Occupational Classification (NOC) codes for the province or region, and the needs of each of the five major regions (GTA, Central Region, Northern Region, Eastern Region and Southwest Region).

For example, in the 2024 allocation request letter, Ontario noted increased nomination levels were needed to respond to provincial labour demands generated by ongoing investments in infrastructure (Building Ontario), and to support objectives such as health care, manufacturing and the construction of 1.5 million homes. No discussion of specific occupations or skills were noted, nor were there specifics regarding regional needs, although the Ministry does have access to this information, as noted in **Sections 4.2.1** and **4.2.2**.

In 2022, the Province engaged in bilateral discussion with IRCC, leading to an agreement to add provisions in the Canada-Ontario Immigration Agreement to develop a process that formalizes the exchange of evidence-based provincial labour market information to inform federal economic immigration priorities.

Under this agreement, Ontario would submit reports to identify labour market priorities, with a focus on occupations that the federal government should consider when selecting economic immigrants. The IRCC would provide feedback on how provincial and territorial input, including from Ontario, informed federal economic immigration priorities.

We confirmed that the proposed provisions are not included in agreements between IRCC and other provinces or territories, and no similar arrangement exists with other provincial/territorial nominee programs. A change in federal minister in 2023 occurred before the new provisions were approved, and instead the existing agreement was extended until November 24, 2024. At the time of our fieldwork, the Ministry obtained Cabinet approval to make a proposal to IRCC that maintains these previously negotiated provisions.

### **Recommendation 1**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development work with the federal government to establish an information-sharing agreement and/or other formal methods of communication that will provide the federal government with specific information about Ontario's labour market needs, both provincially and regionally.

For the auditee's response, see **Recommendations and Auditee Responses**.

### 4.1.3 The Program Can Manage the Current Allocation Level, but the Province Has Significantly Increased Its Allocation Requests, Which May Strain Its Current Operational Capacity and Put Program Integrity at Risk

The majority of Ontario's economic immigrants are selected federally by IRCC (79% in 2023). In November 2023, the Ministry asked the federal government for a significant increase in its allocation. In principle, this would allow Ontario to have greater input on the selection of all its economic immigrants by 2026. However, the Ministry's allocation requests have greatly exceeded its assessment of operational capacity for the next three calendar years, as shown in **Figure 7**.

We noted that the Ministry's own analysis showed that it could support additional nominees but not at the levels ultimately submitted to the federal government. For 2026, the request was 236% higher than the Ministry identified as operationally feasible. The Ministry was unable to provide analysis for how it would support such a large increase.

On March 21, 2024, the federal government approved Ontario's 2024 allocation to be 21,500. This was an increase of 5,000 (30%) over 2023. The 2025 and 2026 preliminary allocations would also remain at 21,500.

On August 6, 2024, the Ministry estimated an additional 66 full-time equivalents (FTEs) would need to be hired—in addition to the current complement of 167 FTEs—to effectively fulfill the federal government's approved allocation of 21,500 nominees. However, as of September 10, 2024, the Ministry had only been approved to hire 49 additional FTEs in 2024/25.

**Figure 7: OINP Nomination Allocation Request and Operational Capacity, 2024–2026**

Source of data: Ministry of Labour, Immigration, Training and Skills Development

	2024 <sup>1</sup>	2025 <sup>2</sup>	2026 <sup>2</sup>
OINP Request	25,370	55,815	117,490
OINP Capacity <sup>3</sup>	18,500	25,000	35,000
Request above Capacity	6,870	30,815	82,490
% Difference	37	123	236

1. Federal government-approved allocation of 21,500.

2. Allocations subject to change.

3. Allocations considered operationally feasible by the Ministry under the current organization structure and staffing levels.

Although there are advantages to increasing the number of applicants that Ontario can nominate for permanent residency, the magnitude of the increase comes with risks. The Ministry has recognized this and has noted the following:

- » If staffing and resources are not made available, the program may not meet nomination targets, leaving employers and communities at a disadvantage.
- » A substantial increase in the allocation in 2024 could heighten the risk of immigration fraud, since the program would not have the capacity to review all potential cases of fraud and the increase could signal to applicants that the program is vulnerable.
- » If large numbers of program staff must be hired at once, the Ministry might not be able to attract the best talent, and will face delays in processing. The Ministry acknowledges that it takes time for new staff to be fully effective, which impacts the number of nominations the program renders each month. A quality assurance review, completed by the Ministry in November 2023, further corroborated this point by stating that the ability to assess credibility and the likelihood of misrepresentation largely depends on experience.

## Recommendation 2

We recommend that, before submitting its annual nominee allocation request to the federal government, the Ministry of Labour, Immigration, Training and Skills Development thoroughly analyze and determine the operational capacity needed to support the request, including the number of staff required, staff experience, processes for maintaining program integrity, and adherence to the number of intakes from each stream.

For the auditee's response, see [Recommendations and Auditee Responses](#).

### 4.1.4 The Economic Impact of Nominating Individuals Without Job Offers Has Not Been Assessed

Over the five years from 2019 to 2023, 72% of nominees were selected through streams that did not require a job offer. For 2023 alone, 85% of nominees were selected through streams that did not require a job offer.

The nominees selected outside the job offer streams were primarily:

- » individuals with a Masters or PhD degree from an Ontario university (35% of total nominations in 2023; 21% from 2019 to 2023); and
- » individuals who qualified through the federal Express Entry human capital stream (30% of total nominations in 2023; 31% from 2019 to 2023). This stream offers targeted draws

for applications from foreign workers who have skills to respond to a range of labour market needs.

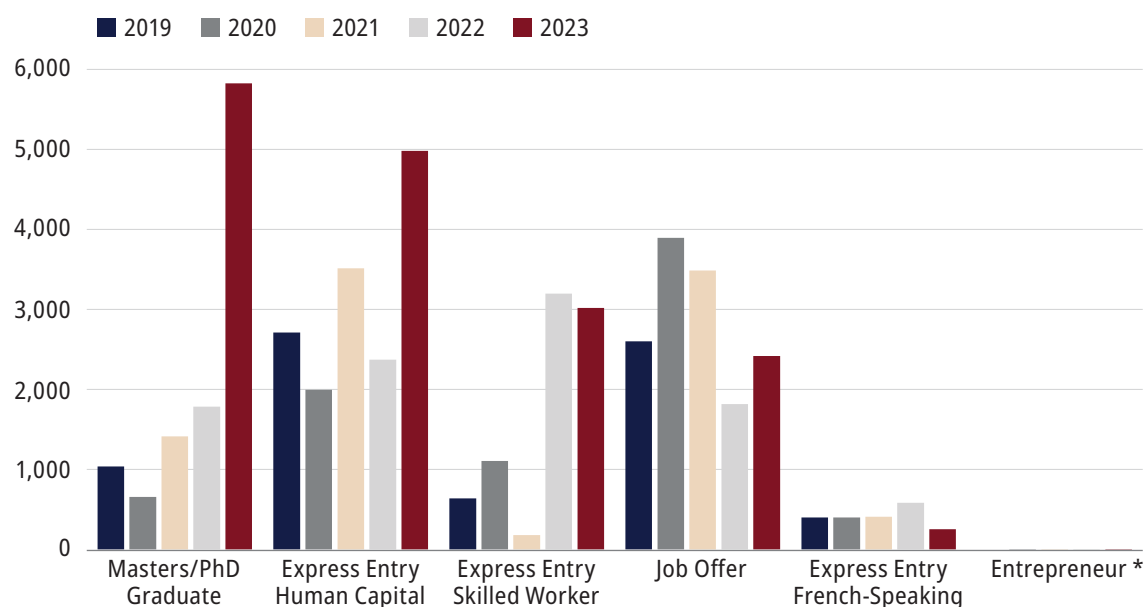
**Figure 8** shows the trend in nominations, by stream, for the years 2019–2023.

Some nominees outside the job offer streams may be working in Ontario at the time of nomination (for example, through a post-graduation work permit for international students). However, the Ministry did not analyze current employment information of non-job-offer stream nominees to know if they are filling labour market needs in Ontario.

We noted that as the number of nominations increases, the percentage of Masters and PhD graduate nominees increases. Particularly in the 2023 year in which there was a 69% increase in the number of total nominations compared to 2022, there was a 227% increase in the number of Masters and PhD graduate nominations. In 2023, Masters or PhD graduate nominees with no job offer surpassed nominees with a job offer by 3,408 (58%). Compared to five years ago in 2019, nominations in 2023 to Masters and PhD graduates increased 461%, while job offer stream nominations decreased 7%, as seen in **Figure 8**.

**Figure 8: OINP Nominations by Stream Type, 2019–2023**

Source of data: Ministry of Labour, Immigration, Training and Skills Development



\* The number of nominations in the Entrepreneur stream are too few to be visually represented. The stream had no nominations in 2019; one in each of 2020 and 2021; and three in each of 2022 and 2023.

From 2021 (the earliest the Ministry collected standardized data) to 2023, 72% of nominees from the Masters and PhD graduate streams came from either engineering, computer and information sciences, or business, with engineering studies accounting for 43%. As noted in **Section 4.2.1**, beginning in 2022, the Ministry placed an emphasis on health-related fields of studies; however, we noted that only 8% of Masters and PhD graduate nominees came from health-related fields in 2022 and 2023.

The Ministry told us a reason for the increase in the number of nominations for international graduates is because these applications are less risky and complex and require less verification, so they are quicker to process to meet the nomination allocation.

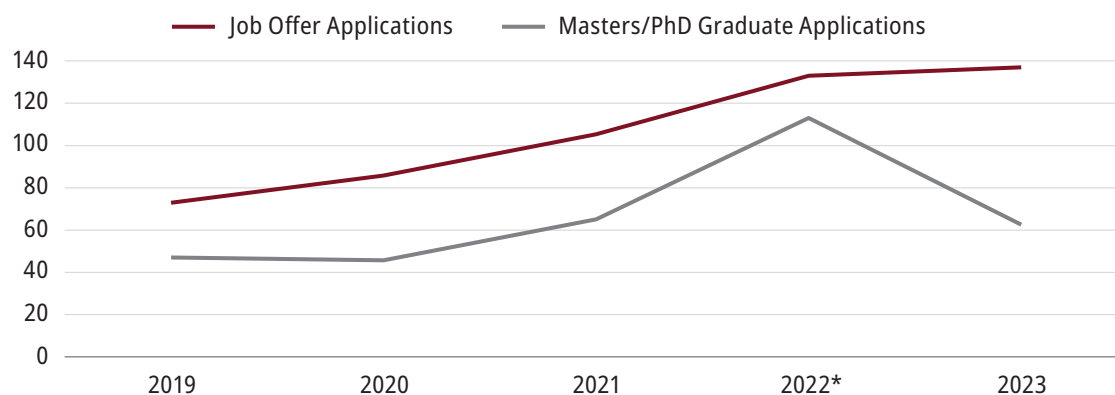
We analyzed the length of time it took the Ministry to process the applications of job offer nominees and Masters and PhD graduate nominees and found that in each of the last five years, the time taken to process Masters and PhD graduates was much lower, as shown in **Figure 9**.

We also analyzed the operational plans of the Ministry (discussed in **Section 4.2.1**) and noted that in 2023, when the number of nominations increased significantly, the Ministry had planned to nominate 16% of its allocation from the Masters and PhD graduate streams. However, as noted above, to achieve its allocation limit, 35% of its nominations were made through those streams.

The Ministry has not routinely monitored whether nominees without job offers who are admitted to Ontario are eventually employed. Doing so could demonstrate whether nominating people who do not have job offers but have post-graduate degrees results in positive economic outcomes. This is discussed further in **Section 4.4.2**.

**Figure 9: Average Days to Process Job Offer Applications and Masters/PhD Graduate Applications, 2019–2023**

Source of data: Ministry of Labour, Immigration, Training and Skills Development



\* The Ministry told us the longer processing times in 2022 resulted from a strain on staff capacity as nominations increased. In 2023, the issue was addressed by streamlining decision-making in lower-risk streams, including the Masters/PhD graduate streams. Previously the assessment and decision-making steps for those streams were performed by two processing staff; but starting in 2023, both steps have been done by one senior processing officer.

At the time of our audit, we noted that other provincial nominee programs also nominate certain skilled individuals without a job offer. For instance, British Columbia targets recent graduates with a Master's degree in specific natural, applied, or health sciences fields, or a Doctoral degree in any field from an eligible B.C. post-secondary institution. Individuals must demonstrate the ability and intent to live, work and economically establish in B.C., but a job offer is not required. However, beginning in early 2025, Master's degree graduates will no longer be eligible without a job offer.

In Manitoba, individuals can apply without a job offer if they can demonstrate a strong connection to the province through family or friends, or through past education or employment, and if they can also meet language, education, work experience and adaptability criteria.

In contrast, the Nova Scotia Department of Labour, Skills and Immigration told us that it transitioned away from nominating applicants without a valid job offer or work experience in Nova Scotia, and decreased approvals for such cases from 15.7% in 2020 to 0% in 2024 (as of October 15).

### **Recommendation 3**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- review and assess relevant data to establish the proportion of nominees that should come from the job offer and non-job-offer streams to best meet the province's labour needs; and
- monitor whether nominees without job offers who are admitted to Ontario are eventually employed and not collecting social assistance, and take corrective action where necessary.

For the auditee's response, see [\*\*Recommendations and Auditee Responses\*\*](#).

## 4.2 Program Alignment with Labour Market Needs

### 4.2.1 Occupations with the Highest Vacancies Are Not Addressed Through OINP Nominations, in Favour of Other Policy Priorities

Ontario's labour market is impacted by various factors, such as educational policies, the age of the workforce and the economy. Statistics Canada data shows job vacancies in Ontario have increased over the five-year period from 2019 to 2023. At the end of 2023, there were 222,000 job vacancies in Ontario, 20% more than in 2019. Properly managed immigration is a way in which some of the labour market demand can be addressed, which is a primary objective of the program.

In 2022, OINP implemented a set of specific policy objectives and targeted levels of nomination (**Figure 19**, discussed further in **Section 4.6.1**). The program has identified the specific occupations considered to be applicable to the technology, skilled trades and health care policy objectives (with construction added in 2024). See **Appendix 5** for all occupations in which over 100 people were nominated, and their alignment with Ministry priority objectives for the period 2019–2023.

Although the Ministry has generally met its policy objectives, it has not always nominated individuals in the occupations identified through data as the most needed. We compared the top 10 occupations in Ontario, based on the largest vacancies as reported by Statistics Canada, to the number of nominations the Ministry has made in those occupations since 2019. **Appendix 6** shows that, as of the end of 2023, occupations with the largest vacancies have received little attention through the program, ranging from 0.1% of nominations (for social and community service workers) to 2% of nominations (for transport truck drivers) for the period 2019–2023.

For 2024 nominations, the Ministry included further priority occupations for selection in the following streams: employer job offer/foreign worker; employer job offer/international student; and Express Entry/human capital priorities. The Ministry chose 22 priority occupations based on their relevance to the Housing Supply Action Plan (under the *More Homes Built Faster Act*), and another 82 occupations for having a positive job outlook in specific industries. We compared the additional priority occupations against the Ministry's job outlook projections for Ontario and noted that only 20.2% of the occupations had an above-average job outlook projection, while 12.5% were below average.

In contrast, when determining the top 10 occupations nominated in 2023, we noted the Ministry's nominations have largely focused on technology and skilled trades, which the Ministry itself has noted to have average future demand. **Appendix 7** shows the top 10 occupations nominated through OINP in 2023, compared to the number of vacancies for those occupations in Ontario, and Ontario's outlook on job demand for the occupation, as determined by OINP.

In the fall of each year, the Ministry develops an operational plan to determine what skills will be targeted through nominations in the upcoming year. The Ministry finalizes the plan once

final nomination allocations have been provided by the federal government. The purpose of the operational plan is to set out the policy target (such as sectors, occupations and skills in high demand), timing and the number of invitations for application that will be sent out for each stream. To achieve Ministry policy priorities, the operational plan also identifies whether selection will be from all eligible applicants in a particular stream or targeted toward eligible applicants who also have specific occupations.

There is not a standard methodology, set of information or analysis used to determine what the policy objectives and targeted skills will be: they are ultimately decided by the Minister's Office.

To develop the operational plan, the Ministry requests input from other ministries about jobs and skills needed in industries they are responsible for or involved with. But there is no formal structure or defined information to be provided in responses from other ministries, resulting in responses that contain inconsistent and anecdotal information.

For example, in 2023 the Ministry of Economic Development, Job Creation and Trade informed the OINP that many large technology sector companies were conducting lay-offs locally and globally, and although the Ministry of Economic Development, Job Creation and Trade also stated that the technology sector remains a priority, it did not provide job market data or other analysis to support this feedback.

In developing its operation plan, the Ministry also obtains information and input from its Labour Market Information and Research Unit (LMIR) about labour market performance and trends, a resource available to all Ontario ministries. For example, LMIR would normally provide reports on labour shortages and job outlooks in Ontario; Statistics Canada census and job-related data; and information on specific sectors or skills. It is up to the OINP to interpret and apply the information into their operational plan.

In an effort to increase nominations in the priority area of health care, effective July 2024, the Ministry, in consultation with the Ministry of Health and the College of Nurses of Ontario, waived Canadian education requirements for nurses and related occupations in order to remove this barrier to applying to the program. Previously, all nurses under Express Entry streams were required to have at least a Canadian bachelor's degree in nursing.

After the amendment, the OINP will also consider individuals with an extended class licence issued by the College of Nurses of Ontario, allowing certain foreign-trained nurses with lower educational requirements to qualify for nomination. The Ministry has not determined how many expected nominations will come out of this change.

#### Recommendation 4

We recommend that the Ministry of Labour, Immigration, Training and Skills Development nominate individuals who meet immediate and projected labour needs, by:

- formalizing the input process from other Ministries to clearly state labour market demand by National Occupational Classification code, with supporting data, if available; and
- identifying occupations with a large number of vacancies and including them in targeted draws for applications.

For the auditee's response, see [Recommendations and Auditee Responses](#).

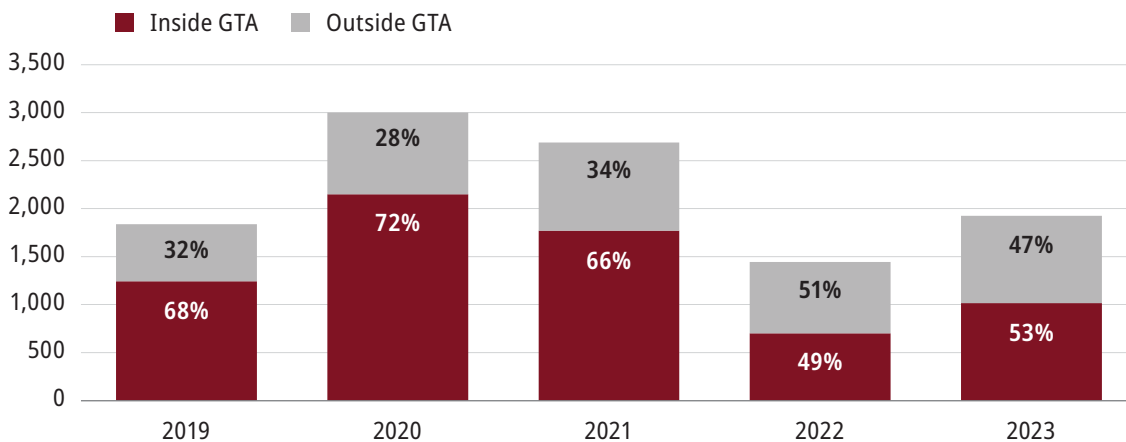
#### 4.2.2 Over the Past Five Years, Nominees Disproportionately Favoured the GTA, But There Is Improvement

One of the program's objectives is to spread the benefits of immigration to all parts of the province and help address Ontario's labour market needs. However, we noted that OINP has not fully addressed this objective through its current processes, as some regions receive relatively few nominations. Even so, the proportion of nominees with job offers inside and outside the GTA is approaching an even split.

Our analysis showed that for the five-year period 2019–2023, 37% of job offer nominees intended to settle outside of the GTA. As seen in **Figure 10**, the proportion of job offer nominees intending to reside outside of the GTA has generally increased during the five-year period. We noted that reliable data is not available to analyze where nominees in the non-job-offer streams intend to settle.

**Figure 10: Number and Percentage of Nominees with Job Offers, Inside and Outside the Greater Toronto Area, 2019–2023\***

Source of data: Ministry of Labour, Immigration, Training and Skills Development



\* 21% of the geographic data for employer job offer nominees was not available or was inconsistent and has been excluded.

Regional variations in where employer job offer nominees intended to settle during the period 2019–2023 can be seen in **Appendix 8**. The GTA had 63% of job offer nominees; Central Ontario had 16%; Southern Ontario had 10%; Eastern Ontario had 8%; and Northern Ontario had only 3% of job offer nominees.

The Ministry does not have an overall strategy for a needs-based distribution of nominees across the province, particularly to regions outside the GTA. However, the Ministry has undertaken the following initiatives to encourage nominees to settle in areas other than the GTA:

- » The scoring methodology for the provincial Expression of Interest system, established in 2018 to rank top-scoring candidates, awards additional points to those with job offers outside the GTA or to those who studied in Ontario outside the GTA, in an attempt to encourage immigration to other regions of the province. Individuals intending to reside in Northern Ontario are awarded the highest points related to intended settlement location.
- » In 2020 and 2021, there was a two-year regional pilot initiative to bring 300 nominees to the Chatham-Kent, Cornwall and Quinte West/Belleville communities. The pilot resulted in 147 nominations. However, no follow-up was conducted to see how successful the individuals were in these communities, or if they continue to reside in these communities.
- » Beginning in 2022, the Ministry established a regionalization target in its annual operational plan, stating that 50% of employer job offer nominations are to be outside the GTA. This approximates the population dispersion of the province. OINP achieved this target in one of the prior two years, with 51% in 2022 and 47% in 2023. However, this would be more effective if it included specific skills and occupations (NOC codes), as well as proportional targets for specific regions outside the GTA.
- » On June 24, 2024, the Ministry proposed a new one-year regional immigration pilot to begin on January 1, 2025. The pilot will set aside nominations from the OINP's employer job offer streams for three to four selected partner communities that have a demonstrated need for regional immigration. Each community is expected to receive up to 200 nominations. At the time of our audit, there was a short list of 18 communities under consideration.

In August 2019, the Conference Board of Canada released a report noting that developing an Ontario Regional Immigration Strategy could improve the Province's efforts to ensure a broader distribution of newcomers in support of economic development across Ontario. A concerted strategy is needed, given that immigrants can live anywhere in Canada because their mobility rights are protected under the Canadian Charter of Rights and Freedoms. The report also noted that the OINP is the biggest policy lever that the Ontario government can use to improve regionalization.

We noted that other provinces have incorporated mechanisms into their nominee program to encourage immigration to less populous areas. For example, Alberta's nominee program includes a dedicated stream to attract and retain newcomers to rural communities with a population under 100,000 outside Calgary and Edmonton, in order to address labour needs and support economic development. Participating communities work with employers to attract, recruit and retain newcomers, and select and endorse candidates for nomination.

We also noted that, in 2019, the federal government established the Rural and Northern Immigration Pilot, a five-year pilot program to boost economic immigration to smaller communities and provide a pathway for skilled foreign workers to gain permanent residency. Of the 11 participating communities, five are in Northern Ontario (North Bay, Sudbury, Timmins, Sault Ste. Marie and Thunder Bay). The pilot is community driven, whereby communities recommend candidates to IRCC for permanent residency.

As of December 31, 2023, almost 4,600 permanent residents across Canada had come through this pilot. The federal government announced two new pilots for fall 2024 (the Rural Community Immigration Pilot and the Francophone Community Immigration Pilot) as replacements, with a combined goal of 5,500 permanent resident applications per year.

To further demonstrate the need for immigration to fill labour needs outside the GTA, we examined the job vacancy levels across the province, and the change in vacancy levels between 2019 and 2023. Statistics Canada reported that in 2023, there were about 123,000 vacancies outside the GTA, a 30% increase compared to 2019, while the GTA had a less drastic increase of 8% with 107,000 vacancies.

The specific labour demands were also different within and outside the GTA. Over the five years from 2019 through 2023, occupations with the largest growth in demand outside the GTA were in the categories of health, education, law, and social, community and government services. Within the GTA, the largest increases were in the categories of health and trades, transport, and equipment operators.

We also examined the occupations with the highest change in vacancies in each geographic region from 2019 to 2023, and compared these to OINP nominations in the corresponding regions. In all cases, very few nominations had been made in the occupations with the largest growth in job vacancies. For example, job vacancies for registered nurses and registered psychiatric nurses (NOC 31301) increased significantly in all regions in the province; however, the corresponding nominations have not helped to address the growing workforce concerns.

The five-year vacancy increases in each region for these occupations, and the corresponding OINP nominations received, have not been commensurate. For example, vacancies in Central Ontario for registered nurses and registered psychiatric nurses increased by 1,730 between 2019 and 2023, while there were only 11 nominations for those occupations in that region during the five-year period. **Appendix 9** provides further details about the occupations with the highest demand growth in regions across Ontario.

Based on our analysis of information provided by Statistics Canada, retention rates differ significantly on a regional basis. Following provincial nominees who received permanent residency in 2016, the retention rate of those who remained in the province declined over the following five years for all of Ontario's economic regions, as shown in **Figure 11**.

**Figure 11: Retention Rates of Ontario Provincial Nominees Who Received Permanent Residency in 2016, by Economic Region<sup>1</sup>**

Source of data: Statistics Canada<sup>2</sup>

Economic Region	2017 (%)	2021 (%)	Five-year Change (%)
Greater Toronto Area	90	83	(7)
Ottawa	73	69	(4)
Northeast	67	67	0
Windsor-Sarnia	60	58	(2)
Hamilton-Niagara Peninsula	67	55	(12)
London	65	50	(15)
Kitchener-Waterloo-Barrie	57	46	(11)

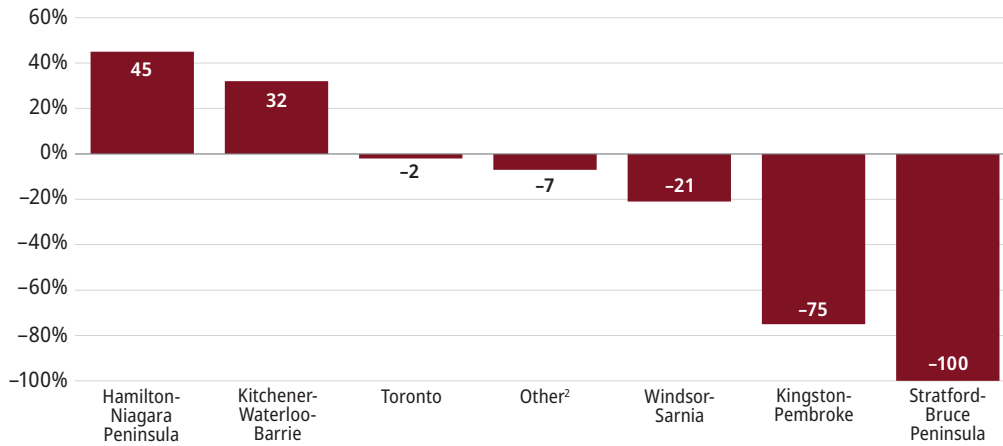
1. Statistics Canada groups its 49 Ontario Census Divisions into 11 economic regions created as a standard geographic unit for analysis of regional economic activity. Statistics Canada had no data available for the economic regions of Kingston-Pembroke, Muskoka-Kawartha, Stratford-Bruce Peninsula and Northwest.

2. Data for this analysis was obtained through a custom order from Statistics Canada using elements of the Longitudinal Immigration Database (IMDB) and Census.

Our analysis also showed that, years after arriving, many permanent residents who came through the nominee program moved away from the economic region in which they initially settled. Specifically, we found an increase in migration to the Hamilton-Niagara Peninsula and the Kitchener-Waterloo-Barrie regions from other areas in the province. However, 83% of individuals through the OINP still reside in the GTA. **Figure 12** shows the 2021 net percentage change in migration within the province, by economic region, for OINP permanent residents who arrived in 2016.

**Figure 12: Net Percentage Change in Migration within Ontario for OINP Nominees Who Received Permanent Residency in 2016, by Economic Region, as of 2021**

Source of data: Statistics Canada<sup>1</sup>



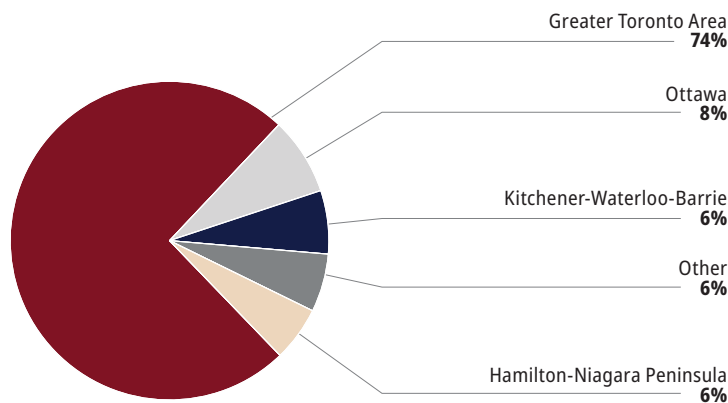
1. Based on tax filing location. Data for this analysis was obtained through a custom order from Statistics Canada using elements of the Longitudinal Immigration Database (IMDB) and Census.
2. Other economic regions as defined by Statistics Canada include: London, Muskoka-Kawarths, Northeast, Northwest and Ottawa. They have been grouped because the individual totals are small (net change of 10 or fewer tax filers).

**Figure 13** shows the economic regions within Ontario where these nominees resided in 2021.

We also found that Ontario receives immigrants from provincial nominee programs across the country. Following the 2016 permanent residency year, we found that over the five-year period ending in 2021, close to 4,800 individuals relocated to Ontario from another provincial nominee program, with 63% moving to the GTA.

**Figure 13: Economic Region of Residence within Ontario for Ontario Provincial Nominees Who Received Permanent Residency in 2016,<sup>1</sup> as of 2021**

Source of data: Statistics Canada<sup>2</sup>

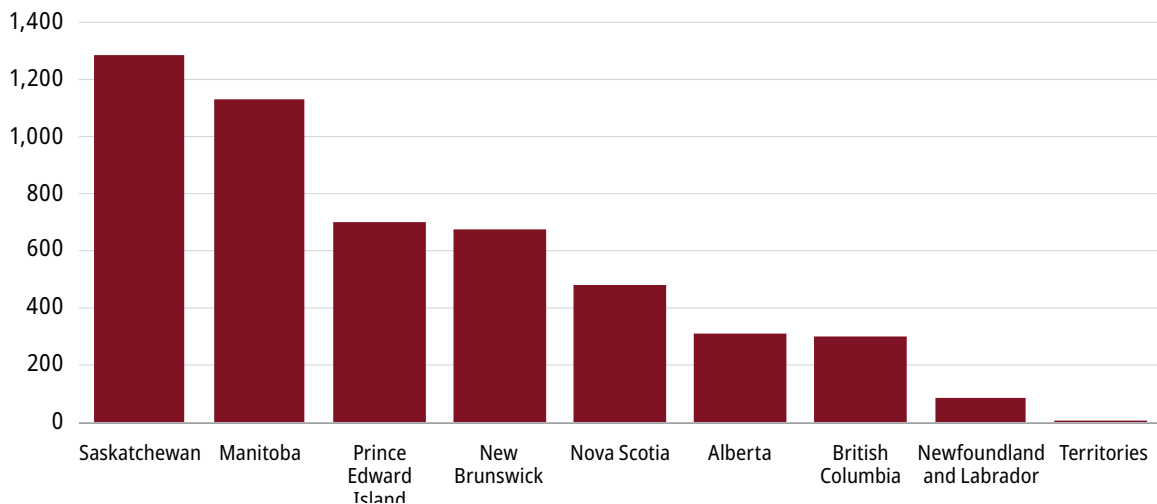


1. Other economic regions have been grouped because the individual totals are small (100 or fewer tax filers). Economic regions grouped as 'Other' include: Kingston-Pembroke; London; Muskoka-Kawarths; Northeast; Northwest; Stratford-Bruce Peninsula; and Windsor-Sarnia.
2. Data for this analysis was obtained through a custom order from Statistics Canada using elements of the Longitudinal Immigration Database (IMDB) and Census.

**Figure 14** shows the provinces where immigrants from other provincial nominee programs moved from. In comparison, we found that only 175 Ontario nominees who obtained permanent residency in 2016 relocated to another province in the five-year period ending in 2021. The majority went to either Alberta (37%) or British Columbia (37%).

**Figure 14: Immigrants from Other Provincial Nominee Programs Who Received Permanent Residency in 2016<sup>1</sup> and Relocated to Ontario in the 5-Year Period Ending 2021**

Source of data: Statistics Canada<sup>2</sup>



1. Due to the time lag between nomination by provincial nominee programs and the granting of permanent residency by the federal government, the admission year may consist of nominees from multiple nomination years.
2. Data for this analysis was obtained from Statistics Canada using elements of the Longitudinal Immigration Database (IMDB) and Census.

### Recommendation 5

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- collect information on nominees' intended settlement location for all nominee streams;
- prepare and implement a long-term strategy, including targeted skills and occupations, for the distribution of the Ontario Immigrant Nominee Program nominees across provincial regions, based on identified regional labour needs; and
- monitor progress toward the regional targets annually, and take corrective action where regionalization targets are missed.

For the auditee's response, see [Recommendations and Auditee Responses](#).

### 4.3 Detection of Potential Program Abuse and Misrepresentation

Permanent residency is highly sought after and, because there are limited spots available, this creates an elevated risk of misrepresentation to the immigrant nominee program. This can include falsifying documents, misrepresenting or providing false information about qualifications or circumstances, or engaging in other forms of deceit to manipulate the immigration process.

Having processes in place to prevent and detect misrepresentation, and taking steps to verify that applications are not misrepresented, is essential to protect the integrity of the program. The impact of misrepresentation in the program is that some people receive permanent residency (ultimately Canadian Citizenship) and all its benefits without being entitled to them; and once granted, permanent residency is difficult to reverse if later discovered.

Common examples of misrepresentation by applicants, employers and representatives include:

- » falsifying past work experience to satisfy eligibility criteria;
- » falsifying job offers (for example, real business but fake job offers; fake business; company created by a representative or relatives/friends of representatives solely for the purpose of sponsoring workers);
- » falsifying language test scores;
- » not working in the position approved in the application; and
- » representatives preparing applications without the knowledge of employers.

## // Case Examples of Misrepresentation Investigated by the OINP

Source: Ontario Immigrant Nominee Program investigation files

### Case 1

The employer form submitted as part of the OINP application stated the applicant was currently working as a Food and Beverage Processing Supervisor, and also included a job offer letter provided for the same employment position. When program staff called the business signing officer (a company employee who signed the employer form submitted to the program) to confirm information, they were informed that the business signing officer no longer worked for the company. This prompted the program to conduct an on-site inspection. The inspection revealed that, although the applicant had previously worked for the company, the applicant had never worked as a Food and Beverage Processing Supervisor (the approved employment position). In the applicant's actual role, they would not have met the program eligibility requirements and would not have been nominated. The application was refused and the inspection recommended issuing an administrative monetary penalty and banning the applicant. No action was taken against the employer because it was determined a former employee of the company was behind the ploy and was responsible for submitting falsified job offer letters and information to the program.

This inspection also found five other applications submitted by this employer with the same authorized representative involved in all the applications. These applicants had already been nominated by the program. In each case, the inspection found that the applicants were not working or had never worked in the approved employment position for which they were nominated. The program cancelled the nominations, but in two cases IRCC notified program staff that these applicants had already been granted permanent residency so no action was to be taken. The inspection recommended issuing an administrative monetary penalty and banning the authorized representative for failing to make reasonable efforts to ensure that the information provided by the applicants was correct, accurate and not misleading.

### Case 2

An unauthorized representative was behind an elaborate scheme that used shell companies (fake companies created for the purpose of securing nominations) and real companies to manufacture falsified job offers and fabricate work experience in applications submitted to the program. In this case, the Ministry found 38 applications with falsified job offers and work experience involving 12 connected companies in the same scheme. Fake/falsified documents included lease agreements, company financial statements, bank statements, tax forms, pay slips and employment letters. The program refused or cancelled the applications connected to this scheme. At the time of our audit, the Ministry was in the process of issuing bans and administrative monetary penalties to applicants, employers and the representative involved.

### 4.3.1 There Are Weaknesses in Application Verification Procedures

Applications to the immigrant nominee program go through four stages of processing: completeness check; assessment; decision; and, if approved, issuance of certificate of nomination. In each of the stages, the application is handled by a different level of staff, with each level building off the work of the prior stage. At each stage, the staff are responsible for verifying various details included on the application form, which will be used to make a final decision on the file.

#### **Third-Party Verification Procedures Could Be Used More Widely**

The strongest form of verification is third-party verification, where the information reported by the applicant is verified against an external source. In the absence of third-party verification, the Ministry could ask applicants to provide notarized documents, as this enhances authenticity, legal validity, prevention of misrepresentation and overall trustworthiness, providing benefits to the Ministry where it is difficult to authenticate digital copies of documents provided as support.

At the time of our audit, we noted the Ministry was implementing some third-party verification procedures for certain details in the applications. We also identified areas where more robust verification processes were needed, particularly where documents may be susceptible to misrepresentation. These included:

- » verification of the authenticity of an applicant's photo and passport by requiring documents to be notarized;
- » direct verification with IRCC of documents submitted by an applicant in support of their legal status in Canada, such as work or study permits;
- » direct verification with the Canada Revenue Agency of documents submitted by an applicant in support of their prior work experience in Canada, such as a T4 or Notice of Assessment;
- » verification (directly with the financial institution or through an affidavit) of bank statements and other investment statements provided by an applicant to support required settlement funds; and
- » direct verification with Employment and Social Development Canada (ESDC) of the authenticity of Labour Market Impact Assessments (LMIAs).

A positive LMIA is intended to show there is a need for a foreign worker to do the job and that no Canadian worker or permanent resident is available. To obtain the assessment, an employer must send an application to the Temporary Foreign Worker Program administered by ESDC.

Employers providing job offers to OINP applicants (including those who entered Canada through the federal Temporary Foreign Worker Program) are required to demonstrate they have made reasonable efforts to fill a position with a permanent resident or Canadian citizen before offering the position to the applicant. This is the case unless there is a valid LMIA for the occupation and position or the applicant has a valid work permit in Ontario.

At the time of our audit, information had been reported that indicated that some employers and immigration consultants forge and/or sell the LMIA (in some cases there may not even be a real job attached) to give individuals higher scores on Canada's Express Entry immigration system.

OINP staff also confirmed that the program has discovered possible fraudulent LMIA's, but does not verify the authenticity of the LMIA with ESDC.

In an effort to address the higher risk of misrepresentation in the Express Entry skilled trades and job offer streams, in June 2024 the Ministry entered into a partnership with the Ministry of Finance. Under the partnership, the Ministry of Finance validates applicant and employer information provided by the program.

If warranted, the Ministry of Finance performs a secondary review on the information and flags files that are suspicious and have credibility concerns. Results from the review are provided to OINP to consider in application decision-making. However, the information received from the Ministry of Finance is very limited: it includes a yes/no response to the data validations and files flagged for credibility concerns.

At the time of our audit, the Ministry of Finance validated almost 1,600 Express Entry skilled trade files and over 100 employer job offer files, from March to June 2024, including a pilot of the partnership prior to full implementation in June 2024.

## Recommendation 6

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- seek expansion of its partnership with the Ministry of Finance to establish a process to verify data for all streams, using a risk-based approach; and
- implement direct third-party verification of documents submitted by applicants in support of their application, such as passports, T4s, Notices of Assessment, bank statements, and Labour Market Impact Assessments.

For the auditee's response, see [Recommendations and Auditee Responses](#).

### **Application Verification Procedures Are Not Well Documented, Reducing Assurance That All Necessary Verification Procedures Have Been Performed**

It is important to have the verification of applications well documented at each stage in order for a seamless file transfer from one stage to the next, and to have assurance that all necessary verification procedures have been performed. Clear documentation of verification is critical in maintaining accountability throughout the process to ensure case notes include sufficient details to support nomination decisions. It also creates an audit trail and allows for quality control to make continuous improvements to the process and identify best practices (discussed further in **Section 4.3.4**).

Before February 2024, the guidance to staff for documenting verification procedures on a file did not include guidance for all relevant criteria. This resulted in inconsistencies in the level of documentation and in evidence of the work performed.

We reviewed case files prior to February 2024 and noted that only 27% included detailed documentation for all applicable criteria reviewed as part of the verification process. For example, documentation to satisfy the review of the criterion of proving legal status in Canada included details of the status and its duration (work permit, study permit or visitor visa and the dates of validity) for some files, whereas others noted only whether or not the criterion was met.

The assessment note guidelines were updated between February and May 2024 for all the streams, and now include all applicable assessment criteria. According to the recently updated guidelines, the processing staff are required to note whether or not the applicant meets the required criteria and, in most cases, what documentation was provided and reviewed to support the decision on each eligibility criteria.

The guidelines include response templates to be used for each assessment criteria, as well as additional guidance to follow where additional information may be required. For example, in the job offer streams, if the gross revenue or number of FTEs falls between a specific threshold, the processing staff are required to obtain additional information or documentation to satisfy the criteria.

We reviewed a sample of both approved and denied applications from all the streams to determine if staff consistently followed the recent assessment note guidelines. We found the following inconsistencies where the guidelines could be improved to provide more accountability, transparency and efficiency:

- » Processing staff verify certain details provided on the application through open-source Internet searches (for example, the credentials of an authorized representative, language test results and details on the business) as well as closed-source searches (such as checking with the Ministry of Labour for regulatory compliance and checking the Ontario Business Registry). In applications where these searches are required, the process leaves it up to the staff to perform the appropriate due diligence and conclude on the results of their searches. Staff are not required to save documentation of the

work they did, with the exception of checking for a valid licence or certification, where required. Saving documents that result from searches would allow for verification that staff performed the searches with due diligence at the time the application was processed.

- » Job offer streams include the criterion that employers demonstrate that the position is urgently necessary to the employer's business. This is assessed mainly by the employer's explanation, open-source Internet information about a business, employer application history with the immigrant nominee program, the size of the business and the occupation of a job offer. Staff are only required to note whether or not the application demonstrates that the position is urgently necessary to the employer's business. Additional explanation is only required where the application does not demonstrate the necessity, but it would be beneficial for others who review or interact with the file to know what evidence was used to confirm that the criterion was met.
- » The guidelines are not specific for the "Intention to reside in Ontario" criterion, leading to inconsistencies in the level of detail included in the file about the review that was conducted. Guidelines state that staff are only required to note whether the application demonstrates on a reasonable basis that the applicant intends to reside in Ontario, which the Ministry told us it considered to be supported by submission of the application itself. We noted from a sample of files that, in 65% of applications, staff had reviewed the letter of intent or the application summary and made note of personal, professional and/or social ties, as well as employment, which clearly indicated intent to reside in Ontario, while the remaining files simply noted the intent was demonstrated without mentioning the support.
- » Only 7% of the files we reviewed included a breakdown of the points that were earned for each category. Although not required by the guidelines, the breakdown of the score is helpful in understanding if there were any adjustments to the score at the time of attestation, compared to the verified score, thereby indicating a potential risk of misrepresentation.

### Recommendation 7

We recommend that the Ministry of Labour, Immigration, Training and Skills Development regularly review and update assessment note guidelines to include additional documentation of the verification that was completed, including proof of third-party verification, details on how the employer demonstrates the necessity of the position to the business (for the employer job offer streams), details to support the intention to reside in Ontario, and expression-of-interest scoring verification.

For the auditee's response, see [Recommendations and Auditee Responses](#).

### 4.3.2 Application Information Is Not Routinely Analyzed to Identify Trends and Detect Suspicious Patterns

Regular data analytics can help identify unusual trends and high-risk areas, allowing for early intervention. The immigrant nominee program only recently started to do some *ad hoc* data analysis (in April 2023). It included staff triaging applications associated with program integrity concerns, based on indicators it had identified from reports extracted from the program's case management system. For example, staff analyzed data to identify applications that included the same work experience, along with the same immigration representative, or groups of applications associated with problematic employers or immigration representatives, to determine if they were connected through a scheme. Before April 2023, the Ministry did not complete any such analysis.

We found that data analytics were limited by the lack of functionality of the Ministry's case management system. The case management system houses all applicant information and is used by processing staff to conduct and store assessments. This system is not integrated with the work of the program's investigation's unit.

Investigation staff perform and maintain their work outside of the case management system making it more difficult for the program to perform different types of analyses, and so inspection information that is collected, including information related to enforcement and compliance, is tracked manually using Excel spreadsheets that are stored in a separate shared drive accessible by program staff.

Program staff told us that integration of application information with identified program integrity concerns would allow staff to analyze and filter applications, employers and representatives for suspicious patterns. This analysis and filtering could be done using associated information, such as addresses, telephone numbers and other identifying information.

In February 2024, the program received approval for a project proposal to integrate and document investigation information within the existing case management system. However, at the time of our audit, the project had been put on hold and firm cost estimates, timelines for implementation and specific functionalities of an integrated system had not been established. The program was also looking into purchasing existing software used by other Ontario ministries for compliance and enforcement.

Program and information technology staff expressed that system integration would allow efficiencies, such as automatically checking whether an application is associated with an individual who has previously had compliance issues.

As more information is collected and analyzed, an integrated system could be programmed to automatically flag any application with a greater risk of misrepresentation, based on pre-determined and defined criteria. Examples could include the submission of a high volume of applications by a specific employer over a given period of time; the ability to flag addresses

associated with a non-existent business; or the ability to flag an employer, representative, or applicant with prior contraventions, or who is currently banned or had been banned from the program in the past.

In the absence of an integrated system, the program maintains a separate Excel spreadsheet listing high-risk representatives and employers. Processing staff are instructed to cross-reference to this list before beginning their file review. Applications associated with these individuals must be referred to a dedicated team that conducts additional verification of high-risk files.

The effectiveness of this process depends on the high-risk list being continuously updated and on processing staff correctly identifying these files, but policies or processes for maintaining and updating the list had not been developed. An integrated system could automatically flag such files, alerting processing staff about files that require greater scrutiny without staff needing to refer to the tracking lists.

### Recommendation 8

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- compare the costs and benefits of buying commercial software versus developing an in-house solution that would integrate the investigation unit's work with the program's case management system and that would include data analytics capabilities;
- based on the cost/benefit analysis, implement an integrated system; and
- conduct regular data analyses to identify and detect suspicious trends, and investigate those risks where warranted.

For the auditee's response, see [\*\*Recommendations and Auditee Responses\*\*](#).

#### 4.3.3 Results of Program Inspections Revealed Weaknesses in the Ministry's Application Processing to Prevent and Detect Misrepresentation

Inspections are conducted when misrepresentation is suspected. Inspections can occur any time from when a candidate applies to the program (pre-nomination) up until when the candidate receives permanent residency (post-nomination).

The program has mainly relied on reactive inspections, which come from two main sources: referrals from OINP program staff and tips from the public. In 2023, 3% of all applications were inspected (539 of 17,970); and only 9% of applications from high-risk streams (employer job offer and Express Entry skilled trades streams) were inspected (539 of 5,907). In 2023, 72% of applications inspected were for nominations that had already been approved. Data to perform such analyses for 2022 was not available, as the Ministry did not maintain a detailed tracking of inspections.

We analyzed 2022 and 2023 enforcement data and found the following:

- » Inspections uncovered a high rate of program abuse in applications. In 35% of inspections completed in 2022 and 22% of inspections completed in 2023, the inspector recommended a monetary penalty and/or program ban.
- » A high proportion of program abuse in applications discovered by inspectors related to applications in which applicants had already been nominated for permanent residency by the program. Specifically, in 67% of cases from 2022 and 2023, where inspectors recommended issuing either a monetary penalty and/or ban, applications had already been approved and individuals had been nominated.
- » Of all enforcement action recommended by inspectors in 2022 and 2023, over half (54%) were from public tips, not because the file had been identified by the program's application verification procedures.

From a prevention perspective, the ideal scenario is to detect a falsified application before it is approved. The Ministry has the power to cancel a nomination after a candidate has been nominated; however, if the nominee receives permanent residency by the federal government before the Ministry cancels the nomination, the federal government's process to revoke becomes more difficult, according to IRCC.

We found that in 18% of inspections conducted in 2022 and 2023 where inspectors found program abuse or misrepresentation, the applicant had already received permanent residency. In the remaining cases where inspectors found abuse or misrepresentation, monetary penalties or program bans were recommended.

#### **4.3.4 More and Better-Quality Supervisory Reviews of Application Files Are Needed to Assess Whether Staff Evaluate Credibility, Apply Due Diligence and Reach Supported Decisions**

Starting in 2019, the program began conducting file reviews. A processing staff team lead would randomly select two files per processing officer, twice a year. We examined the most recently conducted reviews (February–April 2024) and found that 88% of processing staff had their file decisions reviewed for files processed in 2023 and early 2024. In 2023, supervisory reviews accounted for only 0.8% of applications processed in that year.

The review requires team leads to evaluate staff on two criteria: (1) whether notes are clear, logical, descriptive and consistent with operational guidance; and (2) whether correspondence tone, style and content are consistent with operational guidance. Key criteria are not evaluated. These key criteria include the processing staff's ability to identify, assess, and document credibility and program integrity concerns, and whether appropriate conclusions are made.

In November 2023, OINP conducted a one-time review of a small sample (16) of approved applications for the Express Entry skilled trades stream. Part of the evaluation looked at staff's ability to observe and document program integrity concerns. The review noted that 25% of the approved files that were sampled contained a program integrity concern about the credibility of work experience.

The review concluded that the case notes lacked details and so it was unclear if the staff were routinely doing additional verification checks as part of their assessment, as required for all high-risk applications. Also, it was not always clear how processing staff weighed the evidence to determine that all criteria were met. These findings prompted the program to provide additional guidance and refresher training to enable staff to assess the credibility of work experience submitted by applicants under this stream. The guidance also provided more clarity on how staff are expected to document their assessment.

During our audit, we also reviewed a sample of approved applications that were identified as high-risk in order to determine if staff consistently performed additional verification checks. We found that additional checks had been noted in most files (93%), but the extent of additional checks performed or how decisions were reached was unclear because of the lack of details documented by staff in their case notes. For most files (80%), processing staff did not conduct telephone interviews with applicants and/or employers, as required by Ministry guidance.

### Recommendation 9

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- determine a suitable sample size for supervisory review of files;
- include as part of the supervisory review assessment, the processing staff's ability to identify, assess and document credibility and program integrity concerns, and whether appropriate conclusions are made;
- evaluate as part of the supervisory review, whether program staff are consistent in identifying program integrity concerns and in performing additional verification checks;
- compile overall trends in supervisory review evaluation results to identify weaknesses in program processes; and
- take corrective action, such as providing training and guidance where inconsistencies or non-compliance with processing requirements are found.

For the auditee's response, see **Recommendations and Auditee Responses**.

### 4.3.5 Limitations of Investigator Powers and Stream Requirements Impede the Program's Ability to Detect and Deter Abuse in the Express Entry Skilled Trades Stream

Applicants in job offer streams must be employed in the approved position as of the date they are nominated (if they are already working for the employer), or within 10 months of the date they are nominated (if they are not already working for the employer), and must remain employed in the approved position until they obtain permanent residency.

However, applicants in the skilled trades stream, representing 16% of nominations for the period 2019–2023, are not required to be working in the approved trade at the time they apply or before receiving permanent residency. The stream requires the applicant to have one year of past work experience in Ontario. According to senior program staff, it is difficult to verify if applicants ever really worked in the approved trade since work experience can be fabricated.

Investigators have the legal authority to conduct on-site inspections of employers in the job offer streams (because they are applicants of the program), but do not have authority to inspect employers under the skilled trade stream. Unless employers are being prosecuted, investigators cannot mandate or compel information from employers who provided work experience reference letters for applicants applying to the skilled trades stream. These employers are also not subject to the *Ontario Immigration Act, 2015* or associated enforcement penalties.

A recent quality assurance review completed in July 2024 by the Ministry also found challenges in post-nomination verification (further discussed in **Section 4.4.1**) posed by the current Express Entry skilled trades stream requirements. The review noted a number of difficulties, including challenges for program staff to:

- » verify work experience in the approved employment position, because applicants do not have to be working in the trade at the time of nomination;
- » follow up on and verify information after nomination, because nominees are not required to work in the skilled trade they were nominated under; and
- » compel applicants to provide documentation verifying their employment and residency status in Ontario, because nominees are not required to communicate to the program any change in their status after nomination.

#### Recommendation 10

We recommend that the Ministry of Labour, Immigration, Training and Skills Development apply program changes that require applicants in the Express Entry skilled trades stream to:

- have a job offer in an approved employment position from an Ontario employer at the time of application, to qualify for this stream;

- be employed in the approved position at the time they are nominated (if they are already working for the employer), or within a set time period after they are nominated (if they are not already working for the employer); and
- remain employed in the approved position and periodically report back to the Ministry, at least until they obtain permanent residency.

For the auditee's response, see [Recommendations and Auditee Responses](#).

#### 4.3.6 The Program Has Not Used Available Enforcement Tools and Only Recently Began to Act on Orders Investigators Recommended

The *Ontario Immigration Act, 2015* that governs the immigrant nominee program gives the Ministry the authority to conduct inspections and investigations and to take enforcement actions by issuing administrative orders and other penalties. The main purpose of inspections is to determine whether there has been a deviation from the Act and if enforcement action is needed. The main purpose of investigations is to determine if the possibility of prosecution exists. Both inspections and investigations are conducted by investigators.

Available enforcement mechanisms include monetary penalties, bans from the program or prosecution. They can be used individually, together or in a graduated manner. Before an order can be issued, legislation requires the individual be provided a notice that the program intends to issue them an order and that describes the facts forming the basis for the contravention. In May 2022, the Ministry began to publish on its website, the names of employers and representatives who have had compliance action taken against them.

From 2018 through 2021, most inspections took the form of desk audits. These audits involved online searches and case management system reviews of application information. Inspectors requested additional documentation or details from program participants to corroborate application data and conducted telephone interviews to clarify and evaluate the credibility of the submitted information.

The Ministry could not provide a complete listing of applications that underwent a desk audit for this time period. However, available enforcement data showed that little enforcement action had been taken by the program.

During this period, seven monetary penalty orders were issued, amounting to \$63,000, and eight ban orders were issued, ranging from one to two years. All of the ban orders were issued for submitting falsified documents to the program.

In late 2021, the program began on-site inspections, and in 2022 and 2023 it significantly increased the number of inspections. The number of inspections went from 67 in 2021 to 254 in 2022 and 539 in 2023. However, we found the program did not take or initiate enforcement action as infractions were discovered. Rather, starting in 2022, recommended enforcement actions based

on inspection findings were tracked by the program on a spreadsheet, but were not carried out after the inspection had been completed. The following year, in May 2023, the program began to review, prioritize and pursue enforcement orders that had been previously recommended by inspectors from inspections conducted in 2022 and 2023.

As of May 2024, the program was still in the process of reviewing and pursuing enforcement actions from inspections completed in 2022 and 2023. We examined the tracking list of recommended orders and the corresponding enforcement actions carried out by the program and found that, as of April 1, 2024, the program had yet to act on the majority of orders inspectors recommended. As shown in **Figure 15**, 87% of recommended monetary penalties remained unissued to employers, applicants or authorized representatives. These unissued recommended monetary penalties totalled approximately \$570,000.

Only two program ban orders (or a notice of intent to issue an order) had been issued, despite inspectors recommending a total of 117 ban orders be issued in 2022 and 2023 (72 to applicants, 28 to employers and 17 to authorized representatives), as shown in **Figure 16**.

**Figure 15: Status of Recommended Monetary Penalty Orders from Inspections in 2022–2023, as of April 1, 2024**

Source of data: Ministry of Labour, Immigration, Training and Skills Development

Offender	Recommended Monetary Penalty Orders	Issued Monetary Penalty Orders and Notices		Unissued Monetary Penalty Orders, as of April 1, 2024		
	#	#	Amount (\$)	#	%	Amount (\$)*
Applicant	72	9	18,000	63	88	126,000
Employer	109	31	62,000	78	72	156,000
Authorized Representative	147	3	6,000	144	98	288,000
<b>Total</b>	<b>328</b>	<b>43</b>	<b>86,000</b>	<b>285</b>	<b>87</b>	<b>570,000</b>

\* Estimated maximum amount. Effective July 2024, the minimum administrative monetary penalty (AMP) increased to \$5,000 from \$2,000 for each infraction (except for foreign nationals, which remained at \$2,000).

**Figure 16: Status of Recommended Ban Orders from Inspections in 2022–2023, as of April 1, 2024**

Source of data: Ministry of Labour, Immigration, Training and Skills Development

Offender	Recommended Ban Orders	Issued Ban Orders and Notices	Unissued Ban Orders, as of April 1, 2024	
			#	%
Applicant	72	2	70	97
Employer	28	-	28	100
Authorized Representative	17	-	17	100
<b>Total</b>	<b>117</b>	<b>2*</b>	<b>115</b>	<b>98</b>

\* One ban order issued for two years for submitting falsified employment documents. One notice of intent to issue a ban order for providing falsified test report/score.

The Ministry indicated that recommended enforcement orders were not acted on as soon as investigations were completed because of the high number and because they were seeking the best approach to the enforcement process to ensure monetary penalties and program bans were done correctly and efficiently. The program had few investigators with legal backgrounds (3 out of 13) who could write notices of intent to issue an order.

The *Ontario Immigration Act, 2015* and its regulations came into force in 2018. However, the Ministry has not yet charged anyone for violations under the Act. At the time of our audit, the Ministry told us that it was in the process of preparing to charge three parties.

### Recommendation 11

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- review all files previously recommended for enforcement but not yet acted upon, and issue enforcement penalties where warranted;
- develop and implement a policy specifying the time period in which enforcement actions must be initiated after infractions are discovered; and
- monitor recommended and initiated enforcement actions to ensure compliance with the specified timelines set out in the policy.

For the auditee's response, see [Recommendations and Auditee Responses](#).

#### 4.3.7 Extensive Notification and Response Requirements Significantly Increase the Time Needed to Issue Enforcement Action

Legislative requirements add to the length of time it takes to process an order. First, a notice must be sent to inform the individual that the program intends to refuse the application (if it is not yet approved) or cancel the application (if it has already been approved). Individuals have 30 days to respond to this notice. After that time, the program can issue a refusal or cancellation, at which point individuals are provided another 30 days to request an internal review of the program's decision to refuse or cancel the application.

At this point, the program is able to start the process of issuing an order if an investigation has determined enforcement action is warranted. The program is required to send the individual a notice of its intent to issue a monetary penalty or program ban, describing the facts forming the basis for the contravention. Individuals are given 60 days to respond. The program then issues the order. Individuals are given another 30 days to submit an internal review disputing the order, and 60 days to pay the monetary penalty, if issued.

We reviewed the length of time it took the program to process orders resulting from inspections completed in 2022 and 2023. We found that on average it took over a year (12.9 months) from the date the inspection report had been approved to the date the order was issued, ranging from a low of 5.9 months to a high of 22.7 months. In addition to legislated timelines, these figures take into account procedural requirements, such as the time needed to review responses from applicants, time for legal consultations and time for approvals.

Program staff expressed to us that legislative timelines were established at a time when the program operated under a paper-based application model, and considered the need for fairness by giving applicants enough time to receive notices by mail and respond in-kind. Since the program accepts applications from individuals outside of Canada, timelines also needed to accommodate international mail.

Program staff further indicated that timelines pose challenges for the program to issue enforcement in a timely manner. For example:

- » Having lengthy timelines delays the message to the contravener, and in the meantime the behaviour could continue with additional applications submitted to the program.
- » Monetary penalties and program bans are publicized so the public can be made aware of bad actors, and possibly avoid bad representatives. The lengthy timelines mean the information does not get to the public in a timely manner.
- » There is a risk of exceeding the two-year time limitation for imposing orders.

### Recommendation 12

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- analyze the impact of the current timelines, and develop options to reduce the time of each step in the process for issuing orders; and
- propose legislated changes based on the completed analysis that will allow orders for monetary penalties and bans to be issued on a timely basis.

For the auditee's response, see [\*\*Recommendations and Auditee Responses\*\*](#).

#### 4.3.8 The Ministry Does Not Know if All Processing Staff Have Taken the Training They Need

Since April 2019, operational staff training for processing and completing verification procedures on applications occurs when staff is first hired, based on the processing role for which they were hired.

The program has a training team, comprised of staff with three and five years of experience, which is responsible for delivering the training modules; maintaining the training and resource materials with program updates; and providing program support to staff.

The duration of training varies from two to three weeks depending on the role. General training on the program is provided to all staff first, followed by role-specific training. Following onboarding, new staff job-shadow an experienced staff person, and the training team reviews a sample of completed files for quality assessment.

Periodically, a post-training survey is conducted of all staff who attended training sessions since the last survey, in order to gauge the effectiveness of training and identify areas for improvement. Results from the past four surveys, held between May 2022 and March 2024, show that an average of 61% of respondents indicated that they had a good understanding of the division. An average of 92% of respondents indicated they were getting enough feedback. Common suggestions for improvement included more hands-on practice time, use of a test environment and consolidating training resources into one source for easy access.

During our audit, we noted that the Ministry has not established an OINP training manual to document the required courses for all staff and for each role; when training should be taken in career progression; and the purpose, objectives and learning outcomes of each training activity.

We noted that the training team maintains an agenda-style master schedule of training activities to plan and record the dates in which training is delivered; the training subject (course); the names of staff who received training; and the trainer delivering the session. Lacking a formal record or summary report, this agenda-style schedule serves as the program's only documentation of what training has been completed by staff. It is therefore not possible to efficiently check for training records of a staff member or whether a particular course has been attended by all staff who should have taken it.

To determine whether processing staff have attended training that the Ministry deemed to be necessary for their position, we compared a sample of processing staff to training they had been listed as taking in the training schedule. The sample was drawn from staff that joined OINP between September 2022 (the earliest for which the Ministry had complete information) and March 2024. We found that 76% of those sampled completed some portions of the training; and only 24% had a record of completing all the deemed necessary training.

Frequent program updates occur for reasons such as changes to processing procedures. Between May 2023 (when the Ministry began tracking the updates in one place) and February 2024, there were 62 guidance updates, averaging about one per week, with notification to staff primarily through email or staff meetings.

We found that training is delivered after onboarding on an *ad hoc* basis to update staff on major program changes. For example, when the NOC was updated in 2021 and came into force in November 2022, there was a training session to explain what the changes were and how to address the changes during processing work.

Periodic training after onboarding would help to ensure all staff receive consistent updates and are current on program practices and procedures.

### Recommendation 13

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- develop and update, at least semi-annually, a training manual outlining the training required for each position, including the purpose, objective and learning outcomes for each training activity;
- provide periodic training after onboarding to ensure all staff receive consistent information on updates and are current on changes to program practices and procedures;
- develop a tracking report that will identify the required training for staff and track who has completed and who has yet to complete each training course; and
- review the tracking report quarterly, and ensure all staff are up to date with required training.

For the auditee's response, see [\*\*Recommendations and Auditee Responses\*\*](#).

## 4.4 Post-Nomination Monitoring

Nominees from all streams are required to demonstrate on a reasonable basis an intention to reside in Ontario to maintain their nomination prior to permanent residency. Following nomination, those nominated through the job offer streams and the associated employer are subject to additional conditions. This includes that the nominee obtains a valid work permit and be employed in the approved position, work for the employer per the terms of employment (position title and duties, wage, hours of work, and work location) within 10 months of the date of nomination (if they are not already working there), and continue to be employed in that position during the nomination period. The program may cancel an approval if the conditions are not met.

### 4.4.1 Quality Reviews Show Significant Deficiencies That Need to Be Addressed

Post-nomination monitoring is done primarily through quality-assurance file reviews by the Ministry's program integrity unit. The file reviews assess program delivery processes and integrity practices. This does not occur on a regular basis through a defined process, such as random sampling of nominee files across all employment job offer streams for follow-up. Rather, the post-nomination follow-up reviews are conducted on an *ad hoc* basis and have focused on a single stream or condition of nomination.

Over the past five years (2019–2023), 14 reviews were undertaken, but only three of the reviews focused on verifying that the conditions of nomination continued to be met after nomination and on identifying possible instances of misrepresentation among nominees. These three reviews were conducted in 2022 and 2023, and focused on only one of the three job offer streams (employer job offer/foreign-worker stream).

Overall, between 2019 and 2023, few nominations were examined through the three reviews. Program staff reviewed a sample of 402 nominations, which represented only 9.7% of nominations through the employer job offer/foreign-worker stream, or 4.4% of nominations across all three employer job offer streams combined (foreign worker, in-demand skills and international students).

The employer job offer/foreign-worker stream was the focus of quality assurance activities as a result of concerns raised from the assessment of applications by processing officers, tips received from the public and results from on-site inspections.

Only 22% of nominees were found to be compliant during the first review; that is, they were living in Ontario and working for the employer in the approved position according to their nomination. Compliance in the stream improved with each subsequent review, with 41% compliance in the second and 72% compliance in the third review. Prior to the third review, nominees received explicit communication that compliance with the conditions and restrictions associated with their nomination certificate was mandatory, including applying for a work permit. A jump in compliance coincided with this explicit communication.

The following significant issues were found during the three reviews that focused on verifying the conditions of nomination:

- » 49% of nominees sampled were not working for the employer or in the approved position of their job offer;
- » 42% of nominees sampled did not apply for work permits within six months, as required;
- » 10% of work permit applications that were sampled were refused by IRCC on the grounds that the applicants would not be able to adequately perform the work they had been approved for, had insufficient language abilities, did not leave Canada at the end of their permit or had not maintained significant ties outside Canada according to their temporary work/study permit requirements; and
- » 8% of nominees received permanent residency without applying for a work permit, as required by the employer job offer/foreign-worker stream.

The post-nomination monitoring recommended cancelling the nomination of 194 (48.3%) files due to non-compliance. However, in 72 cases (37.1%) the nominees had already received their permanent residency, leaving the Ministry no power to revoke its nomination.

In addition to the post-nomination monitoring reviews, the program introduced operational guidance for processing staff in February 2022, focused on identifying and undertaking post-nomination monitoring of files from the job offer streams that present an elevated risk of non-compliance with the conditions of approval. For example, it calls for files to be flagged for post-nomination follow-up when the nominee is overseas at the time of nomination; when wages have been revised post-application; when small employers apply for multiple management positions; or when employers have many positions or applications in process.

The guidance states that follow-up should be done 10 months from the date of approval, and operational team leads should be retrieving the list of files with follow-up activity on a monthly basis for assignment to staff.

Since the new guidance was provided in February 2022, 62 files were flagged for follow-up. However, the post-nomination follow-up work for these flagged files had only begun in May 2024. This was 28 months after the operational guidance was established. The first time the list of files was retrieved for review was in April 2024. By the time the follow-up occurred, some of these nominees were up to 22 months post nomination. Due to the delay in post-nomination follow-up, 25 (40.3% of flagged nominees) had already received their permanent residency.

### Recommendation 14

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- determine a suitable sample size for investigating files at least semi-annually, to ensure conditions of nomination are being met before an applicant in the employer job offer streams receives permanent residency;
- expand monitoring efforts across all employer job offer streams; and
- enforce adherence to the established guidance for flagging files and following up on flagged files at 10 months from the date of nomination.

For the auditee's response, see [Recommendations and Auditee Responses](#).

#### 4.4.2 The Ministry Does Little Post-Nomination Follow-Up of Nominees to Determine Outcomes

The Ministry does not routinely follow up with applicants who are nominated by the program to determine their outcomes, including their work history/experience, settlement history/experience and economic outcome. The Ministry does not collect information to determine whether nominees remain in Ontario, are in the jobs they were nominated under, or whether they have jobs and in what occupations.

In 2019, the Ministry conducted an online survey of all nominees and employers nominated between 2013/14 and 2017/18, focusing on economic outcomes and client experience as part of an internal evaluation required every five years under the Canada-Ontario Immigration Agreement (COIA). At the time of the evaluation, internal program evaluators (with support from an external consultant) recommended that the Ministry continue distributing the survey every year for regular data collection. The Ministry had not undertaken annual surveys after the one in 2019.

In May 2024, the Ministry launched a nominee survey with plans to distribute a corresponding employer survey in January 2025. The Ministry told us it plans to distribute these surveys annually going forward. Significant findings in the 2019 survey included the following:

- » 94% of respondents reported they were working for pay or operating a business in Ontario, and 48% of those were working for the same employer they had at time of nomination;
- » the median annual income of respondents in 2018 was \$47,000, which was comparable to the median income of all Ontarians;
- » 81% of respondents reported they were currently working in a job that matched their education and work experience; and

- » 2.5% of the respondents indicated they had received social assistance, and the nominees with the lowest social assistance usage (1%) were nominated under the Masters graduate stream.

According to the Ministry, it did not continue with annual surveys after 2019 because it did not have the staff capacity and because there is no requirement to undertake continuous evaluation under the COIA.

As part of the application process with nominees, the program's consent requirements allow for follow-up surveys of the clients up to five years after nomination. Collecting data on economic outcomes and settlement experiences twice during the consent period would allow the Ministry to study nominees' settlement experiences and work history and provide insights into their ongoing location in the province and their economic participation. This, in turn, could help identify trends or areas needing improvement.

Another tool the program can leverage is longitudinal data available through Statistics Canada, which includes information obtained through IRCC and taxation data from the Canada Revenue Agency, such as addresses, income and use of social assistance. Similar to post-nomination surveys, the program obtained this data in 2019 as part of its five-year internal review, which, although not linked to individual nominees, provides some information about immigrants by class, and separately for the Provincial Nominee Program immigrants.

We obtained additional data from Statistics Canada related to the OINP and other provincial nominee programs that the Ministry has not analyzed, but that provides useful insights. The additional data included retention rates indicating the percentage of nominees who remain in the province, as well as movement within the country, employment outcomes and economic outcomes (for example, median salaries and instances of social assistance).

We analyzed data we obtained directly from Statistics Canada and found those who received permanent residency in 2016 earned a median employment income of \$50,100 in the 2021 tax year, which represented a 39% increase from their median employment income in 2017 (the first tax year after admission).

We also found that 88.7% of OINP nominees who became permanent residents in 2016 were earning employment income in Ontario at some point during 2021; and only 0.4% of this cohort collected social assistance, excluding Employment Insurance, at some point in 2021.

Our analysis also found that the percentage of nominees accessing Employment Insurance increased in each subsequent year after receiving permanent residency. For the 2016 cohort, 6.6% of the nominees accessed Employment Insurance in 2017, rising to 13.1% in 2021. To provide perspective, 11.5% of Ontarians accessed Employment Insurance in 2021, based on tax data.

### Recommendation 15

We recommend that, on an annual basis, the Ministry of Labour, Immigration, Training and Skills Development:

- survey all nominees, two years and five years after nomination, to collect data on the nominee's settlement experience and work history, including current location, occupation, job stability, and overall integration into the community;
- survey all employers who participate in the employer job offer streams, two years and five years after nomination, to assess the employer's satisfaction with the program, the performance and retention of the nominated employees, and any challenges they faced in the process;
- leverage data from Statistics Canada and the Longitudinal Immigration Database to conduct analyses on retention rates and economic trends of Provincial Nominee Program immigrants; and
- use the data collected annually from applicants, employer surveys and Statistics Canada to regularly inform program improvements.

For the auditee's response, see [Recommendations and Auditee Responses](#).

#### 4.4.3 Fulfillment of the Conditions of Nomination Will Be Unknown When the Entrepreneur Stream Winds Up

The entrepreneur stream was introduced in 2015 to give an opportunity to entrepreneurs outside of Canada to start or buy an existing business in Ontario, with the goal of receiving nomination for permanent residency through the process. Since the start of the stream, there have been eight nominations forwarded to IRCC for permanent residency.

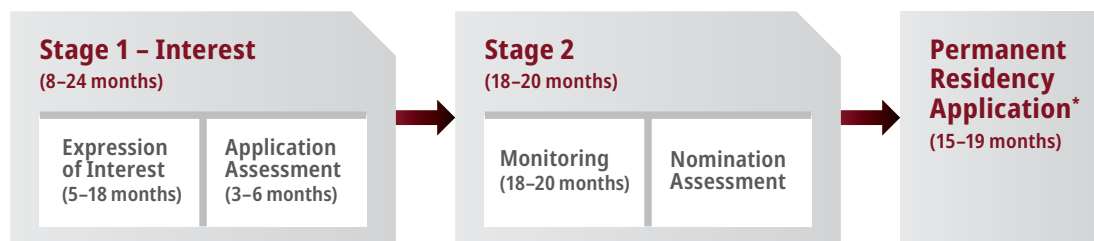
An application takes anywhere from two to four years to receive nomination, including 18 to 20 months to monitor the business to ensure agreed-upon conditions are being fulfilled before a nomination is granted. **Figure 17** shows an applicant's steps and timelines through the application process for the entrepreneur stream.

According to program staff, the low number of nominations is the result of several factors, including the long application process and the requirements. Since 2019, 55% of applications have been withdrawn or not pursued.

In July 2019, the Ministry lowered the eligibility requirements for the amount of investment in the business and for personal net worth, and in April 2021 it made the applicant interview virtual, all to encourage more applications for the stream. However, the changes did not result in more

**Figure 17: Entrepreneurship Stream Application and Nomination Process**

Source of data: Ministry of Labour, Immigration, Training and Skills Development



\* Process with Immigration, Refugees and Citizenship Canada.

nominations. Based on best available data in the case management system, there were 237 registrations before the 2019 changes, which resulted in seven nominations. After the changes, there were an additional 422 registrations, resulting in one nomination.

On December 4, 2023, the Minister made the decision to pause the stream and close it within the next 12 months. No rationale or analysis on the decision was documented; however, staff were given verbal direction to stop accepting any new applications, and to finish processing applications in the system, ideally within 12 months or earlier.

To accelerate the closure, the Ministry proposed eliminating the monitoring period for applicants who agree to implement their business in accordance with their performance agreement. The Ontario government approved the closure of the Entrepreneur Stream on September 26, 2024. At the time of our fieldwork, no official public announcement on the closure had been made and there were no alternatives or future plans for business owners to be nominated through the OINP.

As of May 15, 2024, 169 applications were in various stages of the approval process with the potential for nomination. The removal of the monitoring period would allow an individual to be nominated once a performance agreement is established. Normally the performance agreement period is 20 months, and the applicants submit six quarterly reports or three biannual reports, plus a final report, detailing their progress in meeting commitments of their performance agreement.

The IRCC noted to the Ministry that normally entrepreneur streams should operate with a temporary resident component to give enough time and evidence to ensure a candidate's business proposal is legitimate and successful, which this approach does not allow. However, IRCC's only condition is that the program integrity parameters the Ministry has laid out will need to be followed.

To mitigate the risk that applicants may not fulfill commitments of their nomination, the Ministry plans to inform applicants that their application may be investigated after nomination to confirm compliance with nomination conditions.

In the business streams of the 11 other provincial nominee programs throughout Canada, monitoring time for business operation prior to nomination ranges from 12 months to 25 months. Ontario is close to the median at 20 months. British Columbia and Manitoba have standards that are similar to Ontario; Yukon, Saskatchewan and New Brunswick have longer monitoring periods.

From 2019 to 2023, British Columbia and Manitoba reported 169 and 65 nominations through entrepreneur streams, respectively, compared to only eight nominations in Ontario. From these eight nominations, the OINP expects 41 full-time jobs created and approximately \$10.9 million in personal investment. In comparison, British Columbia also reported that nominations through their entrepreneur immigration stream created 301 jobs and \$55.1 million in personal investment from 2021 to 2023.

### **Recommendation 16**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- develop a strategy to conduct follow-up procedures of entrepreneur stream nominees on a sample basis to ensure conditions of their nomination are being met;
- conduct on a sample basis, post-nomination inspections of entrepreneur stream nominees to determine whether performance agreement conditions are being met, up to the time the nominee receives permanent residency; and
- take action to resolve the non-compliance of performance agreement conditions with the nominee, or revoke the nomination, if warranted.

For the auditee's response, see [\*\*Recommendations and Auditee Responses\*\*](#).

## 4.5 Co-ordination with Other Parties Responsible for Immigration

### 4.5.1 The Program Lacks an Information-Sharing Agreement with the Regulatory Body for Authorized Representatives

Program applicants have the option of hiring an authorized representative to handle the nomination process for any stream. Authorized representatives are regulated under the *Ontario Immigration Act, 2015*. They perform services that include:

- » explaining immigration and citizenship options;
- » filling out and submitting immigration or citizenship applications;
- » communicating with the Government of Canada on behalf of the applicant; and
- » representing applicants in an immigration or citizenship application or hearing.

Authorized representatives need to make reasonable efforts to ensure information is accurate and not misleading. The following individuals are able to act as representatives:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>» persons under the <i>Law Society Act</i>, such as lawyers in good standing with the Law Society of Ontario or another Canadian law society with authorization to practice law in Ontario; and</li> </ul> | <ul style="list-style-type: none"> <li>» licensed members of the College of Immigration and Citizenship Consultants who are in good standing.</li> </ul> |
|---|--|

The College licenses and regulates the practice of Regulated Canadian Immigration Consultants. If someone is not already a lawyer, they must have a licence from the College to provide representative services.

The College's role, its statutory authority, and its powers are set out in the *College of Immigration and Citizenship Consultants Act*, the *Immigration and Refugee Protection Act*, and the *Citizenship Act*. For the five years from 2019 to 2023, almost one-third (32%) of all applications have reported using a representative.

Through its complaints process, the College identifies and investigates breaches of its code of conduct or unethical behaviour of its members. Complaints can be initiated by a member of the public, another regulatory agency or the College itself.

In cases where licensees are found to be non-compliant with the code of conduct or to be providing unethical services, the College can impose disciplinary measures, which include licence suspensions or revocation, restitution to clients, and fines and payment of costs, if allegations of misconduct are proven. Sanctions could also include remedial education requirements and conditions placed on the immigration consultant's ability to practice.

The Ministry and the College do not have an information-sharing agreement in place to inform each other of confirmed and suspected cases of misrepresentation by licensed representatives. As a representative's licence extends across Canada, notifying the College is important to help maintain the integrity of immigration programs in other provinces and territories. The College told us it also does not have information-sharing agreements in place with other provinces or territories at this time.

As part of OINP operating procedures, application processing staff are to verify the representative's status against the College's public registry. However, from our review of application files in the case management system, there was no indication that this step had been completed in 8% of the files we sampled.

Better information sharing between the Ministry and College would help to overcome some legal limitations to the authority and duties of investigators. For example:

- » Ministry investigators do not have legal authority to inspect representatives' offices, whereas College investigators do. A Ministry investigator would need a warrant to enter a representative's office in order to gather information.
- » Under the *Ontario Immigration Act, 2015* applicants and employers must provide information that is accurate, correct and not misleading. However, the legislation states that representatives must only make reasonable efforts to ensure the information provided is accurate, correct and not misleading. According to the Ministry, determining the threshold of what is reasonable, as well as obtaining proof that the representative was aware that the information was not accurate or correct or was misleading, is difficult. For example, representatives have said it was the applicant who provided the information to them and they were unaware it was false, inaccurate or misleading, or that someone in their organization was actually responsible.

### Recommendation 17

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- establish an information-sharing agreement with the College of Immigration and Citizenship Consultants to regularly obtain or have access to information about investigation and enforcement outcomes involving licensed representatives; and
- require program staff, including the Ministry's high-risk team, to use this information to apply additional scrutiny to applications associated with immigration consultants identified by the College of Immigration and Citizenship Consultants as engaging in wrongdoing.

For the auditee's response, see [Recommendations and Auditee Responses](#).

#### 4.5.2 Information Sharing and Co-Ordination with the Federal Government Could Be Expanded and Better Leveraged

Since 2016, the Ministry has had an information-sharing agreement in place with IRCC to provide for the sharing of information related to applicants, employers and authorized representatives found to have misrepresented information, through federal procedures for reviewing and processing applications for permanent residency.

- » However, this current information-sharing agreement could be better leveraged to share information regarding suspected or confirmed misrepresentation on a more regular basis. The agreement does not establish any frequency for the sharing of this information; rather, it is done at the discretion of the IRCC processing officer.
- » Further, only information related to Ontario's nominee program is shared with the Ministry by IRCC; details of representatives or applicants found to have misrepresented information to other provincial nominee programs are not shared. Without this exchange of information, individuals who are found to have misrepresented information in one province/territory may be operating in another without detection.

We also found the Ministry's procedures did not include using publicly available information maintained on IRCC's website about non-compliant employers. This listing includes employers who were found to be non-compliant under the Temporary Foreign Worker Program or International Mobility Program. Details include the employer's business operating name, business legal name, address, reason for non-compliance, date of final decision, whether a penalty was issued and eligibility status. The Ministry could be using this information to verify the employers in the job offer streams to ensure they are not admitting a nominee with a job offer from an employer who is currently banned by IRCC.

#### Recommendation 18

We recommend that the Ministry of Labour, Immigration, Training and Skills Development revise the current information-sharing agreement with Immigration, Refugees and Citizenship Canada to enable regular access (such as monthly or quarterly) to information about nominations flagged by IRCC for misrepresentation from all Canadian provincial nominee programs, as well as those denied permanent residency by the federal government, in order to have a more complete listing of high-risk applicants, employers and representatives.

For the auditee's response, see [Recommendations and Auditee Responses](#).

## 4.6 Performance Measurement and Program Evaluation

### 4.6.1 Outcomes Are Not Assessed with a Comprehensive Set of Measures and Targets to Determine Whether Program Objectives Are Being Met

At the time of our fieldwork, the Ministry tracked and reported the number and percent of skilled immigrants nominated for permanent residency by the program. Skilled workers are defined by the federal government's NOC system to fall within training, education, experience and responsibilities (TEER) levels 0-3. See **Figure 18** for the performance targets and results since the measure was established in 2020.

An effective performance management framework provides a roadmap to guide the organization and help it succeed. It also supports accountability to legislators and the public.

The Ontario government has defined performance measurement as the process used to assess efficiency and effectiveness of programs and initiatives. The current measure does not assess the Ministry's stated objectives for the program (see **Figure 2** in **Section 2.1**). The current focus is only on measuring nomination targets, and does not encompass other measures that prioritize the quality of nominees.

**Figure 18: OINP's Policy Objective Targets and Results, 2022–2024**

Source of data: Ministry of Labour, Immigration, Training and Skills Development

Policy Objective	2022			2023			2024
	Target (% of allocation)	Actual (%)	Result	Target (% of allocation)	Actual (%)	Result	Target (% of allocation)
Francophone	5	6.6	✓	7	1.8	×	3
Technology	20	23	✓	20	33	✓	15
Skilled Trades	20 or above	40	✓	30 or above	28	×	30 or above
Health Care	10	n/a <sup>1</sup>	n/a	10	12	✓	10
Regional Immigration <sup>2</sup>	50	51	✓	50	48	×	50

1. The Ministry did not report on its policy objective targets for health care in 2022.

2. Percentage of employer job offer nominations outside of the GTA.

Our audit of the program in 2014 had also identified that Ontario's provincial nominee program lacked meaningful performance indicators; but 10 years later, useful measures have still not been established. Some areas that we suggested in 2014 included:

- » establishing performance measurements on the outcomes of nominees living in Ontario;
- » determining if individuals without job offers have become economically established; and
- » determining if labour market needs were being addressed by the program;
- » establishing indicators for each program component and for fraud detection activities.

Currently, the Ministry has unofficial targets to monitor the operation and progress of the program through internal annual reporting. However, these targets focus only on program outputs. The targets are in areas such as the number of annual nominations based on IRCC's allocation, nominations made through the Express Entry and Expression of Interest streams, application processing targets for staff, and the number of nominations compared to the Ministry's targets for policy objectives.

**Figure 19** shows the recent policy objective targets that have been undertaken by the Ministry, with the corresponding results. However, these targets do not address the program's effectiveness in meeting its objectives.

### Figure 19: Number and Percent of Skilled Immigrants Nominated for Permanent Residency

Source of data: Ministry of Labour, Immigration, Training and Skills Development

Year	Number (#) of Skilled Immigrants (TEER 0–3)			Percent (%) of Skilled Immigrants (TEER 0–3)		
	Target	Actual	Result	Target	Actual	Result
2023	11,700	10,231	×	n/a <sup>1</sup>	96	n/a
2022	9,555	7,805	×	98	98	✓
2021	8,000	7,045	×	93	93	✓
2020	7,275	6,789	×	99	92 <sup>2</sup>	×

1. In 2023, Treasury Board Secretariat and the Ministry agreed to not use percentage metrics, since the proportion of skilled workers nominated depends on the Ministry's current priorities related to skilled workers.

2. The Ministry informed us that the target was missed due to OINP expanding its nominations for TEER 4 and 5 (lower skilled workers) based on employer demands and federal initiatives. The metric only considers TEER 0 to 3 nominations and would not capture the change in priorities.

In early 2024, the Ministry started to develop a key performance indicator framework, and is expected to start tracking results in 2025. The Ministry intends to develop a baseline expectation for each metric and then annually set targets for them, with the first targets to be set for 2025.

Our review of draft performance framework documents found that the metrics will focus on nominee outcomes, employer outcomes, program integrity, application processing and program growth. However, metrics to evaluate some program objectives (namely labour market needs for specific regions in Ontario, labour market needs in specific occupations based on occupation vacancies and support for francophone immigration) were not included in the draft framework.

### Recommendation 19

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- finalize and implement a comprehensive set of key performance measures and targets for the Ontario Immigrant Nominee Program, considering all functions of the program, with measures for all stated program objectives, including the labour market needs for specific regions in Ontario, labour market needs in specific occupations based on occupation vacancies, and supporting francophone immigration;
- annually monitor and analyze the performance indicator results against targets;
- make program adjustments needed to achieve the program's metrics and continuously improve the program; and
- regularly evaluate the key performance measures and targets to ensure they continue to meet the Ministry's needs.

For the auditee's response, see [\*\*Recommendations and Auditee Responses\*\*](#).

#### 4.6.2 Monitoring Nominations for Diversity, Equity and Inclusion Could Be Improved to Identify Potential Bias or Inequities

The Ministry collects demographic information from applicants and internally reports on the demographics of nominees each year. Statistics monitored by the Ministry include nominees by gender, country of birth, age, native language and education level.

We noted that the Ministry does not compare the proportion of applications received to the proportion of nominations for key demographics. Such an analysis would help the Ministry identify if a bias exists when nominating applicants and would put it in a better position to address any inequities found.

We performed this analysis with program application data and did not find any bias in the Ministry's nomination of applicants. Specifically, we found the following for the past five-year period (2019–2023):

- » A higher proportion of males were nominated (64% were male); however, applications received over this time period mirror the proportion of nominees (within 1%).
- » The majority of nominees (68%) were born in India (52%) and China (16%), which also reflects the proportion (within 2%) of applications received. These results are expected, as India and China have the largest global populations.
- » The percent of nominees from each country was in proportion to the number of applications received from each country (within 2%).

### Recommendation 20

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- annually analyze demographic data to identify potential biases and inequities in nominations by comparing the proportion of applications received to the proportion of nominations for key demographics, such as gender and country of birth; and
- implement strategies to address any biases and inequities that may be found.

For the auditee's response, see [Recommendations and Auditee Responses](#).

### 4.6.3 Project to Boost the Entrepreneur Stream Did Not Meet Contracted Expectations, Yet Was Not Cancelled on a Timely Basis

In April 2022, following a competitive bidding process, the Ministry entered a contract totalling \$4 million with a third-party vendor to conduct a two-year pilot project in the entrepreneur stream (described in **Section 4.4.3**). The intent of the pilot project was to achieve the following:

- » identify business creation and succession opportunities in regions across Ontario;
- » promote and match business opportunities in Ontario to foreign entrepreneurs abroad;
- » provide legal services to assist foreign entrepreneurs in submitting expressions of interest to the program; and
- » generate 100 applications by March 2024 that would create at least \$20 million in business investment and 100 new full-time jobs.

Over the 14 months the pilot operated, it generated 15 expressions of interest, resulting in nine invitations to apply and eight applications filed (five were returned as incomplete). As of July 2024, there have been four applications that have made it to the monitoring stage, with expected output of four new full-time jobs and approximately \$13 million in business investment.

We reviewed the contract and found that project objectives were clearly stated to provide quality expressions of interest from foreign entrepreneurs, and to result in 100 nominations for entrepreneurs to come to Ontario to successfully establish and operate a new or existing business. The requirements of work to be completed were detailed, as were the required reporting, including dates for all activities and deliverables.

Beginning August 31, 2022, the Ministry documented and communicated to the Minister's Office concerns it had with the project, including that it found the information from the vendor to be of low quality, and that they did not provide services as listed in the agreement. The vendor was found to be duplicating efforts already done by the Ministry, such as reviewing expressions of interest which the Ministry already had in its system.

The Ministry also found that work performed did not substantiate the invoiced amounts, marketing and promotional efforts were poor, and unclear communication was provided by the vendor to the Ministry. Further, the vendor only supported the submission of 15 expressions of interest and eight applications, very far from the contract deliverable of 100 applications.

The Ministry had recommended to the Minister's Office to terminate the agreement on August 31, 2022, and again through formal submissions on May 19, 2023, July 7, 2023, and October 31, 2023. However, the pilot was not cancelled until December 7, 2023, at which point the Ministry had paid a total of \$3.2 million to the vendor. The gap in decision-making ultimately cost the Ministry an extra \$2.9 million than it would have spent if the contract had been cancelled in August 2022 when concerns were first communicated, or an extra \$1.1 million than if it had been cancelled in May 2023 when a formal submission for cancellation was sent to the Minister's Office.

### **Recommendation 21**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development monitor contracts and cancel them promptly if contract conditions are not being met.

For the auditee's response, see **Recommendations and Auditee Responses**.

## Recommendations and Auditee Responses

### Recommendation 1

We recommend that the Ministry of Labour, Immigration, Training and Skills Development work with the federal government to establish an information-sharing agreement and/or other formal methods of communication that will provide the federal government with specific information about Ontario's labour market needs, both provincially and regionally.

### Ministry Response

The Ministry accepts this recommendation and will make efforts to establish a formal communication mechanism with the federal government to provide them with information on Ontario's labour needs. It is important to provide information regarding Ontario's labour needs to inform the federal government's planning for economic immigration because such a high proportion of federally selected immigrants come to Ontario. This recommendation aligns with the OINP's objective of fostering collaboration with the federal government to address Ontario's labour needs.

To address this recommendation:

- The Ministry will continue its leadership role in the Forum of Ministers Responsible for Immigration working groups that facilitate sharing of Ontario's labour market needs with the federal government. Recent activities include participating in consultations on labour market needs to inform the occupations proposed in IRCC's category-based selection initiative, consultations concerning labour market needs tied to changing federal policy regarding international students, and discussions about pathways for trades apprentices. In these cases, the Ministry provided IRCC with some supporting information on labour market needs in the province, as well as alignment with government priorities. The Ministry will continue to use the existing legislated process that the federal government has implemented to collect information from stakeholders including provinces, which they use to inform their immigrant selection to meet labour needs through the "category-based selection" initiative.
- The Ministry is also working on adding previously negotiated provisions into the Canada-Ontario Immigration Agreement to develop a formal mechanism for Ontario to identify its skills and labour market needs and for those needs to inform federal economic selection programs. In addition, the Ministry is asking the parties to develop a mechanism for IRCC to report on an annual basis on how federal economic programs have responded to those needs.

The Ministry is committed to working collaboratively with IRCC to seek its concurrence with implementing updates to the Canada-Ontario Immigration Agreement which reflect this recommendation. We will provide updates on our progress in future reports.

## Recommendation 2

We recommend that, before submitting its annual nominee allocation request to the federal government, the Ministry of Labour, Immigration, Training and Skills Development thoroughly analyze and determine the operational capacity needed to support the request, including the number of staff required, staff experience, processes for maintaining program integrity, and adherence to the number of intakes from each stream.

## Ministry Response

The Ministry accepts this recommendation to analyze and determine the Ministry's operational capacity before submitting our annual nomination allocation request to the federal government.

To secure budget and staffing approvals to operate the OINP, and to secure additional resources when following the program's federal allocation announcement, the Ministry undertakes a review of current resources, productivity, planned projects, program integrity risks, and policy priorities, and puts forward Strategic Planning Process and Treasury Board submissions to seek required resources. The OINP considers the potential impact on staffing and prepares for related approvals for staff and funding when we develop options for how many nominations we request. IRCC provides provinces and territories with their allocations well into the processing year (typically by March) which requires that the Ministry move quickly to seek resources to respond to increasing allocations.

To address this recommendation, the Ministry will ensure that the comprehensive capacity analysis provided to senior Ministry decision-makers to inform budget and staffing allocations supports a thoughtful approach to future year nomination allocation requests.

## Recommendation 3

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- review and assess relevant data to establish the proportion of nominees that should come from the job offer and non-job-offer streams to best meet the province's labour needs; and
- monitor whether nominees without job offers who are admitted to Ontario are eventually employed and not collecting social assistance, and take corrective action where necessary.

## Ministry Response

The Ministry accepts this recommendation. In addition to selecting individuals with qualifying job offers, the OINP aims to select individuals based on human capital factors that are associated with a high likelihood of long-term economic success.

The Ministry will continue to track metrics such as the incidents of unemployment and/or reliance of social assistance for individuals selected for human capital factors, more frequently and include the findings in its program evaluation reports.

In advance of the annual nomination allocation request to IRCC, the Ministry will undertake a review of the current stream breakdown, considering any updated data available from surveys of nominees, Statistics Canada, and the Longitudinal Immigration Database (IMDB), to assess whether adjustments should be made.

The Ministry will not be relying on Masters and PhD graduates to meet its 2024 nomination allocation and, to address this recommendation, the Ministry will increase its focus on job offer streams in future operational plans.

#### **Recommendation 4**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development nominate individuals who meet immediate and projected labour needs, by:

- formalizing the input process from other Ministries to clearly state labour market demand by National Occupational Classification code, with supporting data, if available; and
- identifying occupations with a large number of vacancies and including them in targeted draws for applications.

#### **Ministry Response**

The Ministry accepts this recommendation. Expression of Interest scoring and the targeted draw approach reflects the value of nominating individuals who will integrate quickly into the workforce and meet immediate and future labour needs across the province. The program is constrained by the number of available applicants in federal and provincial selection pools that match Ontario's labour market needs. As a result, selection criteria focus on both human capital characteristics (language and education for example), in addition to occupation-specific work experience. Selecting individuals based on human capital criteria aims to attract individuals to Ontario who can adapt to changing economic conditions over time.

To increase the number of individuals with work experience in in-demand occupations in the selection pools, the OINP established the Immigration Promotion and Employer Outreach unit in May 2023, which participates in international immigration/mobility events, sharing information about Ontario and the immigration process with prospective immigrants to consider when creating their immigration plan.

The Ministry will review its draw strategy with the goal of increasing the selection of workers in urgently needed occupations; continue to work closely with partner ministries to obtain data about labour market demand by National Occupational Classification (NOC) code; and ensure the information received is used to inform stream eligibility, draw parameters, and policy targets.

The Ministry will integrate this information into the program's strategic planning and operational processes and will formalize the input process from other Ministries to clearly state labour market demand by NOC code with supporting data, if available.

### Recommendation 5

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- collect information on nominees' intended settlement location for all nominee streams;
- prepare and implement a long-term strategy, including targeted skills and occupations, for the distribution of the Ontario Immigrant Nominee Program nominees across provincial regions, based on identified regional labour needs; and
- monitor progress toward the regional targets annually, and take corrective action where regionalization targets are missed.

### Ministry Response

The Ministry accepts this recommendation. We will work to integrate available and reliable regional labour market data into our targets where possible.

The program's ability to meet regional targets depends on newcomers' willingness, job, housing and transit availability in regional communities among other factors. By analyzing information about labour needs and where nominees choose to settle, the Ministry is aiming to identify opportunities and challenges across the province which will inform our long-term strategic planning.

### Recommendation 6

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- seek expansion of its partnership with the Ministry of Finance to establish a process to verify data for all streams, using a risk-based approach; and
- implement direct third-party verification of documents submitted by applicants in support of their application, such as passports, T4s, Notices of Assessment, bank statements, and Labour Market Impact Assessments.

### Ministry Response

The Ministry accepts this recommendation. It is a priority to verify the authenticity and accuracy of documents to maintain the integrity of OINP operations and mitigate potential risks. This is why the Ministry has established and will expand its partnership with the Ministry of Finance to validate information using a risk-based approach.

The Ministry will also explore additional opportunities for third-party verification of documents.

### Recommendation 7

We recommend that the Ministry of Labour, Immigration, Training and Skills Development regularly review and update assessment note guidelines to include additional documentation of the verification that was completed, including proof of third-party verification, details on how the employer demonstrates the necessity of the position to the business (for the employer job offer streams), details to support the intention to reside in Ontario, and expression-of-interest scoring verification.

### Ministry Response

The Ministry accepts this recommendation to update assessment note guidelines to include additional documentation of the verification processes completed.

To address this recommendation, the Ministry will review and revise current assessment note guidelines to incorporate detailed documentation requirements for all verification activities. This will provide a clear and auditable trail of all verification processes.

The Ministry will conduct training sessions for staff to ensure they are fully aware of the updated guidelines and understand the importance of comprehensive documentation.

The Ministry will also implement a monitoring system to regularly review the adherence to these guidelines and identify any areas for improvement.

### Recommendation 8

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- compare the costs and benefits of buying commercial software versus developing an in-house solution that would integrate the investigation unit's work with the program's case management system and that would include data analytics capabilities;
- based on the cost/benefit analysis, implement an integrated system; and
- conduct regular data analyses to identify and detect suspicious trends, and investigate those risks where warranted.

### Ministry Response

The Ministry accepts this recommendation and will further analyze how best to integrate the investigation unit's work with the case management system.

The Ministry will engage key stakeholders, including those in information technology, to gather input and ensure a holistic evaluation. The Ministry will consider factors such as initial costs,

long-term maintenance, scalability, customization capabilities, and potential risks. By thoroughly assessing these aspects, the Ministry will make an informed decision that best meets the OINP's needs and objectives, and allow for regular data analyses to identify and detect suspicious trends requiring investigation.

### **Recommendation 9**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- determine a suitable sample size for supervisory review of files;
- include as part of the supervisory review assessment, the processing staff's ability to identify, assess and document credibility and program integrity concerns, and whether appropriate conclusions are made;
- evaluate as part of the supervisory review, whether program staff are consistent in identifying program integrity concerns and in performing additional verification checks;
- compile overall trends in supervisory review evaluation results to identify weaknesses in program processes; and
- take corrective action, such as providing training and guidance where inconsistencies or non-compliance with processing requirements are found.

### **Ministry Response**

The Ministry accepts this recommendation and is committed to improving the existing supervisory assessment process to evaluate program staff's capability in document verification and program integrity, as well as to identify areas of improvement in OINP processes.

To address this recommendation, the Ministry will examine opportunities to strengthen the performance and file review process to improve this process to ensure adherence to program guidelines with a focus on the processing of staff's ability to identify program integrity concerns and in performing additional verification checks.

### **Recommendation 10**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development apply program changes that require applicants in the Express Entry skilled trades stream to:

- have a job offer in an approved employment position from an Ontario employer at the time of application, to qualify for this stream;

- be employed in the approved position at the time they are nominated (if they are already working for the employer), or within a set time period after they are nominated (if they are not already working for the employer); and
- remain employed in the approved position and periodically report back to the Ministry, at least until they obtain permanent residency.

## Ministry Response

The Ministry accepts the Auditor General's recommendation to update the skilled trades stream to ensure that nominees under the stream have suitable skills and that they would be qualified and likely to take up jobs in the skilled trades sector in Ontario.

The nature of work in the sector (often project- or contract-based), may reduce the number of eligible workers under the stream, which would challenge the Ministry to facilitate the attraction and retention of required skilled trades workers in the province.

To implement this recommendation, the OINP will undertake a comprehensive stream review that considers all options for improving stream outcomes, including the option of requiring a job offer. We will seek IRCC approval of any proposed stream changes, as is required under the Canada-Ontario Immigration Agreement.

## Recommendation 11

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- review all files previously recommended for enforcement but not yet acted upon, and issue enforcement penalties where warranted;
- develop and implement a policy specifying the time period in which enforcement actions must be initiated after infractions are discovered; and
- monitor recommended and initiated enforcement actions to ensure compliance with the specified timelines set out in the policy.

## Ministry Response

The Ministry accepts this recommendation to develop and implement a policy specifying enforcement actions after infractions are discovered, including the time period in which enforcement actions must be initiated.

Work on addressing this recommendation is already underway. The Ministry has started drafting an enforcement policy that outlines specific actions to be taken when infractions are identified. This policy will include a range of enforcement measures, from warnings and corrective actions

to more severe penalties, depending on the nature and severity of the infraction. The Ministry will also ensure that the policy is aligned with relevant legal and regulatory requirements to maintain fairness and transparency. The Ministry has begun reviewing files previously recommended for enforcement but not yet acted, and is taking compliance actions where warranted.

The Ministry will ensure that all staff members are aware of the new enforcement policy and understand their roles and responsibilities in its application. This will include training sessions and the distribution of policy documents. The Ministry will establish ongoing monitoring to assess the effectiveness of the enforcement actions and make necessary adjustments.

### **Recommendation 12**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- analyze the impact of the current timelines, and develop options to reduce the time of each step in the process for issuing orders; and
- propose legislated changes based on the completed analysis that will allow orders for monetary penalties and bans to be issued on a timely basis.

### **Ministry Response**

The Ministry accepts the recommendation and will analyze the impact of current timelines and develop options to reduce them, whether legislative, regulatory, policy or process-based.

### **Recommendation 13**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- develop and update, at least semi-annually, a training manual outlining the training required for each position, including the purpose, objective and learning outcomes for each training activity;
- provide periodic training after onboarding to ensure all staff receive consistent information on updates and are current on changes to program practices and procedures;
- develop a tracking report that will identify the required training for staff and track who has completed and who has yet to complete each training course; and
- review the tracking report quarterly, and ensure all staff are up to date with required training.

## Ministry Response

The Ministry accepts this recommendation.

The Ministry will conduct a review of all training materials to ensure they reflect the latest program practices, procedures, and regulatory requirements. We will also specify the training requirements for each position, ensure all staff are aware of the training they need to be effective, and ensure training is completed as part of their annual performance reviews. The Ministry will also develop a tracking report to assess overall fulfillment of required training.

The Ministry will inform all affected staff members of the updates to the training manual. This will involve distributing the updated manual and conducting training sessions to highlight key changes. The Ministry will also set up a feedback mechanism to gather input from staff on the training materials and identify areas for further improvement.

### Recommendation 14

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- determine a suitable sample size for investigating files at least semi-annually, to ensure conditions of nomination are being met before an applicant in the employer job offer streams receives permanent residency;
- expand monitoring efforts across all employer job offer streams; and
- enforce adherence to the established guidance for flagging files and following up on flagged files at 10 months from the date of nomination.

## Ministry Response

The Ministry accepts this recommendation to implement an expanded approach to post-nomination follow-ups, including an appropriate sample size framework, and will strive for semi-annual frequency, subject to available resources.

The Ministry will expand monitoring efforts and enforce adherence to established guidelines based on available program capacity with particular attention to follow-ups at the 10-month mark from date of nomination, for employer job offer streams. The Ministry will ensure decision-makers are aware of capacity needs in order to carry out these recommendations effectively.

The Ministry will also implement a process to inform IRCC of nominations where misrepresentation was found, including where those nominees later received permanent residence.

### Recommendation 15

We recommend that, on an annual basis, the Ministry of Labour, Immigration, Training and Skills Development:

- survey all nominees, two years and five years after nomination, to collect data on the nominee's settlement experience and work history, including current location, occupation, job stability, and overall integration into the community;
- survey all employers who participate in the employer job offer streams, two years and five years after nomination, to assess the employer's satisfaction with the program, the performance and retention of the nominated employees, and any challenges they faced in the process;
- leverage data from Statistics Canada and the Longitudinal Immigration Database to conduct analyses on retention rates and economic trends of Provincial Nominee Program immigrants; and
- use the data collected annually from applicants, employer surveys and Statistics Canada to regularly inform program improvements.

### Ministry Response

The Ministry accepts the recommendation to annually survey nominees and employers of job offer streams at two and five years post-nomination, and to combine this data with information from Statistics Canada and the Longitudinal Immigration Database (IMDB) to inform OINP improvement.

The Ministry has developed and is implementing surveys to collect feedback from nominees and employers at the two-year and five-year marks post-nomination for evaluation purposes. Additionally, as of March 2021, the OINP distributes a client experience survey to all applicants of the program who will receive a decision on their application.

The Ministry will integrate the survey data with relevant information from Statistics Canada's database in regular program evaluations to gain a broader understanding of labour market trends and immigrant demographics. This combined data will be analyzed to identify patterns and inform strategic decisions for OINP improvement. The Ministry is committed to establishing a process for regularly reviewing and acting on the feedback received to ensure that the OINP remains responsive to Ontario labour needs.

### Recommendation 16

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- develop a strategy to conduct follow-up procedures of entrepreneur stream nominees on a sample basis to ensure conditions of their nomination are being met;

- conduct on a sample basis, post-nomination inspections of entrepreneur stream nominees to determine whether performance agreement conditions are being met, up to the time the nominee receives permanent residency; and
- take action to resolve the non-compliance of performance agreement conditions with the nominee, or revoke the nomination, if warranted.

## Ministry Response

The Ministry accepts this recommendation. We will ensure that our implementation plan includes undertaking a risk-based post-nomination monitoring process to ensure that applicants are adhering to conditions of nomination. Any applicant found to be non-compliant will be subject to having their nomination cancelled, along with potential compliance/enforcement actions under provincial and federal legislation, if appropriate.

We will provide training for staff to ensure they understand the importance of these follow-up procedures and are equipped to execute them effectively.

## Recommendation 17

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- establish an information-sharing agreement with the College of Immigration and Citizenship Consultants to regularly obtain or have access to information about investigation and enforcement outcomes involving licensed representatives; and
- require program staff, including the Ministry's high-risk team, to use this information to apply additional scrutiny to applications associated with immigration consultants identified by the College of Immigration and Citizenship Consultants as engaging in wrongdoing.

## Ministry Response

Ministry processes require that program staff verify the licence statuses of immigration consultants with their licensing body. The Ministry accepts this recommendation. An information-sharing agreement with the College of Immigration and Citizenship Consultants could provide additional structure to our relationship with them, and may offer insights that would be valuable to inform the work of the Ministry's high-risk processing team. The Ministry has begun the work of pursuing a formal information-sharing agreement with the College's leadership and legal counsel. The Ministry will report back on the outcomes of these discussions at a future time.

### Recommendation 18

We recommend that the Ministry of Labour, Immigration, Training and Skills Development revise the current information-sharing agreement with Immigration, Refugees and Citizenship Canada to enable regular access (such as monthly or quarterly) to information about nominations flagged by IRCC for misrepresentation from all Canadian provincial nominee programs, as well as those denied permanent residency by the federal government, in order to have a more complete listing of high-risk applicants, employers and representatives.

### Ministry Response

The Ministry accepts this recommendation. Improved information sharing with IRCC could support more informed compliance and enforcement activity and help us to better assess program effectiveness. Better information sharing is one of Ontario's key issues in the re-negotiation of the Canada-Ontario Immigration Agreement.

Information sharing between governments is constrained by privacy legislation at both the federal and provincial levels. That said, Ontario will continue to advocate to the federal government for better info-sharing, including establishing or expanding information-sharing agreements currently in place to provide the OINP with more frequent/updated information.

### Recommendation 19

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- finalize and implement a comprehensive set of key performance measures and targets for the Ontario Immigrant Nominee Program, considering all functions of the program, with measures for all stated program objectives, including the labour market needs for specific regions in Ontario, labour market needs in specific occupations based on occupation vacancies, and supporting francophone immigration;
- annually monitor and analyze the performance indicator results against targets;
- make program adjustments needed to achieve the program's metrics and continuously improve the program; and
- regularly evaluate the key performance measures and targets to ensure they continue to meet the Ministry's needs.

### Ministry Response

The Ministry accepts this recommendation.

The Ministry has been developing a KPI framework with indicators that are aligned with OINP's strategic objectives. These KPIs will cover various aspects of the program, such as nominee outcomes, employer outcomes, regionalization and francophone targets. The Ministry will also be working to establish baseline metrics and set targets for each KPI to measure our progress over time.

The Ministry will develop a reporting system to annually monitor and analyze program performance against these KPIs. This system will include dashboards and reports that provide real-time data and trend analysis. The Ministry will also establish a process for reviewing the KPI data and making necessary program adjustments based on the insights gained.

### **Recommendation 20**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development:

- annually analyze demographic data to identify potential biases and inequities in nominations by comparing the proportion of applications received to the proportion of nominations for key demographics, such as gender and country of birth; and
- implement strategies to address any biases and inequities that may be found.

### **Ministry Response**

The Ministry accepts this recommendation.

The Ministry reviews and reports on the demographic profile of nominees on an annual basis, and will compare the proportion of applications received to the proportion of nominations for key demographics. Staff across the program have participated in anti-racism training that teaches staff to identify and address bias in the workplace and in the OINP design and implementation, using an anti-racism lens. Ministry staff regularly market and promote the OINP to diverse audiences. OINP selection is based on candidate interest and economic factors and is not based on demographic profile.

### **Recommendation 21**

We recommend that the Ministry of Labour, Immigration, Training and Skills Development monitor contracts and cancel them promptly if contract conditions are not being met.

### **Ministry Response**

The Ministry accepts this recommendation. Going forward, the Ministry will continue to monitor contracts closely and will cancel them promptly if contract conditions are not being met. The Ministry will review its contract management process to ensure it is effective in meeting oversight requirements.

## Audit Criteria

In planning our work, we identified the audit criteria we would use to address our audit objectives (outlined in **Section 3**). These criteria were established based on a review of applicable legislation, policies and procedures, internal and external studies, and best practices. Senior management at the Ministry of Labour, Immigration, Training and Skills Development reviewed and agreed with the suitability of our objectives and associated criteria:

1. Ministry processes and resources effectively assess and verify eligibility of nominees for permanent residency in accordance with legislation and program policies, and with regard to equity, diversity and inclusion.
2. The Ministry regularly assesses Ontario's labour force needs and nominates people for permanent residency who have the skills and experience to help address the needs.
3. Ministry processes detect and prevent potential misrepresentation by applicants to the program and their associated employers and authorized representatives, and enforcement tools and penalties are applied consistently and in accordance with legislation to deter future misrepresentation.
4. Post-nomination procedures assess whether individuals nominated for permanent residency under the program continue to work in the skilled occupations for which they applied and were selected.
5. Appropriate performance measures and targets are established and monitored, and compared against actual results to evaluate the effectiveness of the OINP in achieving legislated and stated goals.
6. Systems are in place to collect and maintain timely, accurate and complete information to report on program performance and to identify deficiencies.

## Audit Approach

We conducted our audit between January 2024 and October 2024. We obtained written representation from Ministry of Labour, Immigration, Training and Skills Development management that, effective November 22, 2024, they had provided us with all the information they were aware of that could significantly affect the findings or the conclusion of this report.

As part of our audit work, we:

- » examined whether adequate processes are in place to detect and prevent misrepresentation by applicants, employers or their authorized representatives;
- » assessed alignment of nominee selection with Ontario's assessed labour market demands;
- » examined Ministry processes surrounding program integrity, investigation and enforcement, as well as the program's monitoring of nominees to ensure they continue to meet nomination conditions, and the Ministry's evaluation of program performance;
- » assessed the extent the Province co-ordinates with the federal government to ensure that it takes Ontario's needs into consideration when awarding permanent residency to immigrants Ontario does not nominate;
- » interviewed relevant staff from the Ministry's senior management team, operations staff, and those responsible for policy and labour market research;
- » spoke with external stakeholders and subject-matter experts, including representatives of the College of Immigration and Citizenship Consultants, to discuss licensing, monitoring and enforcement actions for authorized representatives, as well as representatives from IRCC, to discuss nomination allocations, fraud prevention and ways in which Ontario's labour needs are addressed through economic immigration;
- » conducted research of other Canadian provincial nominee programs to determine how Ontario compared in areas, including performance measures, fraud prevention and best practices in addressing labour market needs; and
- » conducted analysis of custom data tables from Statistics Canada to determine outcomes related to the income, employment and use of social assistance by OINP nominees who received permanent residency, as well as their mobility within and outside Ontario.

## Audit Opinion

To the Honourable Speaker of the Legislative Assembly:

We conducted our work for this audit and reported on the results of our examination in accordance with Canadian Standards on Assurance Engagements 3001—*Direct Engagements* issued by the Auditing and Assurance Standards Board of the Chartered Professional Accountants of Canada. This included obtaining a reasonable level of assurance.

The Office of the Auditor General of Ontario applies Canadian Standards on Quality Management and, as a result, maintains a comprehensive system of quality management that includes documented policies and procedures with respect to compliance with rules of professional conduct, professional standards, and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the Code of Professional Conduct of the Chartered Professional Accountants of Ontario, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behaviour.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusions.

December 3, 2024

A handwritten signature in black ink, appearing to read 'Spence', with a large, sweeping flourish at the end.

**Shelley Spence, FCPA, FCA, LPA**

Auditor General  
Toronto, Ontario

## Acronyms

Acronym	Definition
COIA	Canada-Ontario Immigration Agreement
EE	Express Entry
EOI	Expression of Interest
ESDC	Employment and Social Development Canada
FTE	Full-time equivalent
GTA	Greater Toronto Area
IRCC	Immigration, Refugees and Citizenship Canada
LMIA	Labour Market Impact Assessment
LMIR	Labour Market Information and Research Unit
NOC	National Occupational Classification
OINP	Ontario Immigrant Nominee Program
TEER	Training, Education, Experience, and Responsibilities

## Appendix 1: Ontario Nominee Allocations and Nominations, by Stream, 2019–2023

Source of data: Ministry of Labour, Immigration, Training and Skills Development

	2019	2020	2021	2022	2023	Total	% of Total	5-Year Change (%)
<b>Ontario Allocated Nomination Limits<sup>1</sup></b>	<b>7,350</b>	<b>8,050</b>	<b>9,000</b>	<b>9,750</b>	<b>16,500</b>	<b>50,650</b>	<b>–</b>	<b>124</b>
<b>Actual Nominations</b>								
<b>Expression of Interest</b>								
Masters Graduate	805	405	1,202	1,480	5,407	9,299	18	572
Employer Job Offer: Foreign Worker	1,195	1,558	1,705	885	1,122	6,465	13	(6)
Employer Job Offer: International Student	1,347	1,732	1,240	771	856	5,946	12	(36)
Employer Job Offer: In-Demand Skills	60	608	540	159	443	1,810	3	638
PhD Graduate	234	251	212	303	422	1,422	3	80
Entrepreneur	0	1	1	3	3	8	0	
<b>Subtotal</b>	<b>3,641</b>	<b>4,555</b>	<b>4,900</b>	<b>3,601</b>	<b>8,253</b>	<b>24,950</b>	<b>49</b>	<b>127</b>
<b>Express Entry</b>								
Express Entry Human Capital Priorities	2,710	1,996	3,513	2,370	4,985	15,574	31	84
Express Entry Skilled Trades	639	1,106	177	3,196	3,017	8,135	16	372
Express Entry French-Speaking Skilled Worker	401	397	410	583	251	2,042	4	(37)
<b>Subtotal</b>	<b>3,750</b>	<b>3,499</b>	<b>4,100</b>	<b>6,149</b>	<b>8,253</b>	<b>25,751</b>	<b>51</b>	<b>120</b>
<b>Total<sup>2</sup></b>	<b>7,391</b>	<b>8,054</b>	<b>9,000</b>	<b>9,750</b>	<b>16,506</b>	<b>50,701</b>	<b>100</b>	

1. Includes additional in-year allocations approved by IRCC for a federal pilot project intended to expand nominations for TEER 4 and 5 occupations (lower skilled workers) and other adjustments. Therefore, will not agree to allocations listed in **Figure 2**.

2. IRCC allows small variances in the number of annual nominations compared to the allocation. In 2019 and 2020, OINP participated in a federal pilot program that allowed additional nominations to be issued. In 2023, more individuals were nominated due to technical issues in the Ministry's information system, which have been corrected.

## Appendix 2: OINP Categories, Streams and Intake Systems

Source of data: Ministry of Labour, Immigration, Training and Skills Development

Category	Stream	Intake Systems
Human Capital	<b>Human Capital Priorities</b> <ul style="list-style-type: none"> <li>Maximizes opportunities to attract and retain foreign workers with skills to respond to a range of priority labour market needs. Allows for targeted draws in sectors like tech and health care.</li> </ul>	Federal <b>Express Entry</b> system
	<b>French-Speaking Skilled Workers</b> <ul style="list-style-type: none"> <li>Aims to attract foreign talent who have high language skills in both official languages. Professions invited under this stream include professionals in tech, health and education.</li> </ul>	
	<b>Skilled Trades</b> <ul style="list-style-type: none"> <li>Aims to retain skilled tradespeople in Ontario by supporting employers looking to retain temporary foreign tradespeople in designated occupations.</li> </ul>	
	<b>Masters Graduate<sup>1</sup></b> <ul style="list-style-type: none"> <li>Targets individuals who have recently graduated with a Master's degree from an eligible Ontario university.</li> </ul>	OINP's <b>Expression of Interest</b> system
	<b>PhD Graduate<sup>1</sup></b> <ul style="list-style-type: none"> <li>Targets individuals who have recently graduated with a PhD degree from an eligible Ontario university.</li> </ul>	
Employer Job Offer	<b>Foreign Worker</b> <ul style="list-style-type: none"> <li>Targets individuals with a job offer in a skilled occupation (e.g., education, engineering, information and communication technologies (ICT)).</li> <li>Applicants must demonstrate relevant and timely work experience in the same occupation and intention to reside in Ontario.</li> </ul>	
	<b>International Student</b> <ul style="list-style-type: none"> <li>Targets international students with a job offer in a skilled occupation (e.g., education, engineering, ICT).</li> <li>Applicant must have acquired a qualifying, timely educational credential obtained in Canada, and an intention to reside in Ontario.</li> </ul>	
	<b>In-Demand Skills</b> <ul style="list-style-type: none"> <li>Targets foreign workers with a job offer in specific in-demand (low/intermediate-skilled) occupations such as agriculture, general farm labourers, construction and other select occupations.</li> <li>Applicants must have acquired nine months cumulative work experience in Ontario.</li> </ul>	
Business	<b>Entrepreneur<sup>2</sup></b> <ul style="list-style-type: none"> <li>Targets entrepreneurs outside of Canada who are interested in starting a new business or buying an existing business in Ontario.</li> <li>After receiving a temporary work permit, entrepreneurs have 20 months from their arrival in Ontario to implement their business plan.</li> </ul>	<b>Expression of Interest</b> separate from other streams

1. The purpose of the Masters and PhD graduate streams is to retain highly educated individuals who have already started building a life in Ontario and are ready to meet Ontario's labour market needs. The individual must have resided in Ontario for at least one of the last two years.

2. The entrepreneur stream stopped accepting new applications as of December 2023, and is expected to be wound down within 12 months of that date.

## Appendix 3: Eligibility Requirements for the Express Entry and Expression of Interest Systems

Prepared by the Office of the Auditor General of Ontario

### Eligibility Requirements for the Ontario Express Entry System

Eligibility Requirements	Human Capital Priorities	French-Speaking Skilled Worker	Skills Trade
Job offer	x	x	x
Work experience in eligible occupation	✓	✓	✓
Valid licence or authorization <sup>1</sup>	✓	✓	✓
Education	✓	✓	x
Language	✓	✓	✓
Settlement funds	✓	✓	✓
Lives or lived in Ontario	x	x	✓
Intention to live in Ontario	✓	✓	✓
Work permit	x	x	✓
Legal status <sup>2</sup>	✓	✓	✓

1. If required by Ontario law, the applicant must have held the required licence or authorization to perform the duties of the employment position during the time the individual was employed.

2. Individuals applying to the program from inside Canada must be a temporary resident of Canada.

### Eligibility Requirements for the Expression of Interest System

Eligibility Requirements	Employee Job Offer			Masters or PhD	
	Foreign Worker	International Student	In-Demand Skills	Masters Graduate	PhD Graduate
Job offer	✓	✓	✓	x	x
Eligible occupation	✓	✓	✓	x	x
Work experience	✓	x	✓	x	x
Valid licence or authorization <sup>3</sup>	✓	✓	✓	x	x
Education	x	✓	✓	✓	✓
Language	x	x	✓	✓	x
Wage level	✓	✓	✓	x	x
Settlement funds	x	x	x	✓	✓
Lives or lived in Ontario	x	✓	✓	✓	✓
Intention to live in Ontario	✓	✓	✓	✓	✓
Legal status <sup>4</sup>	✓	✓	✓	✓	✓

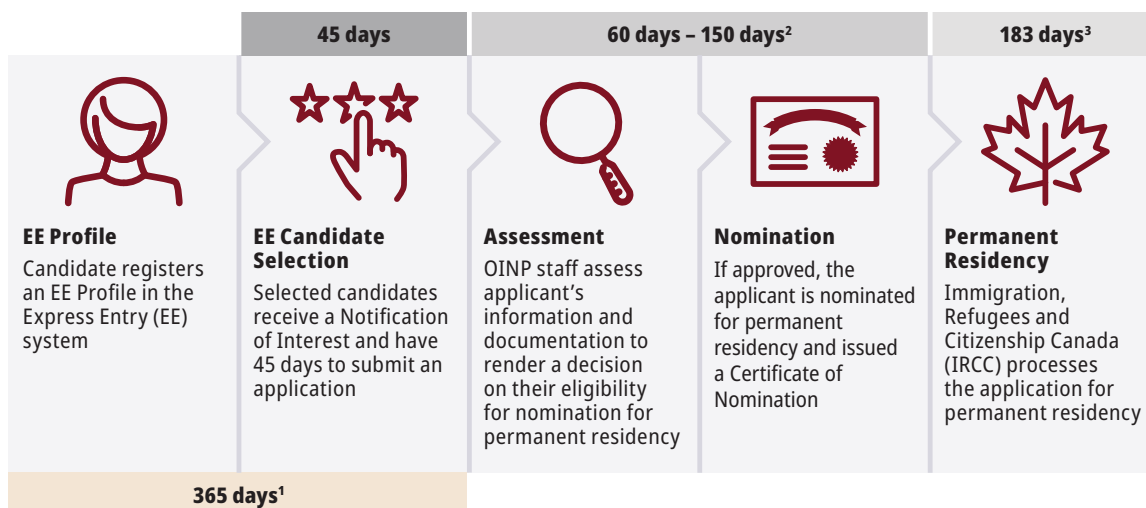
3. If required by Ontario law, the applicant must hold the necessary licence or authorization required to perform the duties of the employment position for which they are applying.

4. Individuals applying to the program from inside Canada must be a temporary resident of Canada.

## Appendix 4: Application and Nomination Process for the OINP

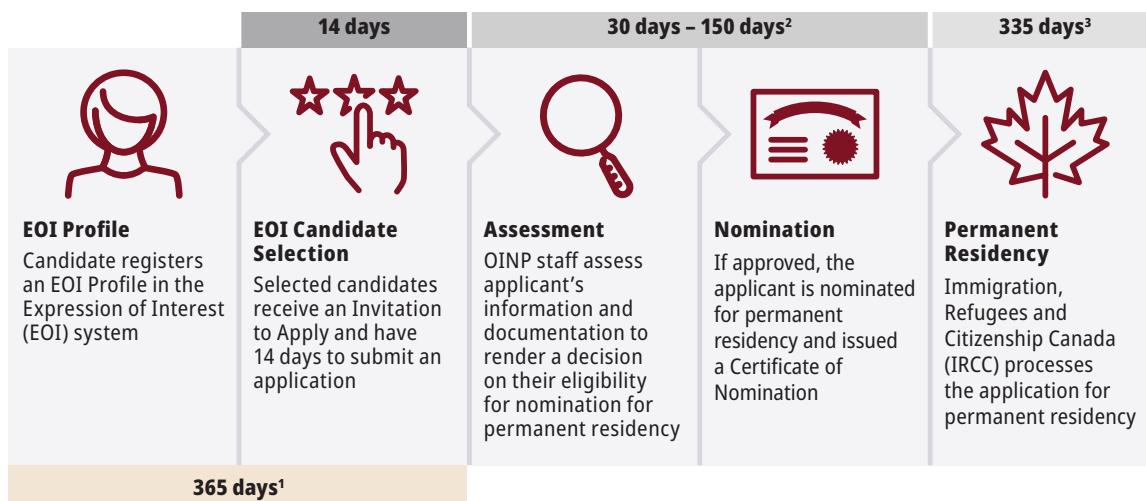
Prepared by the Office of the Auditor General of Ontario

### OINP Registration, Application and Nomination Process, Federal Express Entry System



1. An EE Profile registration will remain valid for up to 12 months until the candidate receives a notification of interest from OINP (or another province/territory), or receives an initiation to apply from IRCC, or until they withdraw their profile.
2. Processing times vary by stream and depend on factors such as application inventory levels, stream processing priorities, staffing levels and program integrity concerns. As of January 2024, the Human Capital Priorities stream had the shortest processing time (60–90 days), while the Skilled Trades stream had the longest (120–150 days).
3. Expected time to process an application for permanent residency according to IRCC, as of June 2024.

### OINP Registration, Application and Nomination Process, Expression of Interest System



1. An expression of interest registration will remain valid for up to 12 months until the candidate receives an invitation to apply or until they withdraw their registration.
2. Processing times vary by stream and depend on factors such as application inventory levels, stream processing priorities, staffing levels and program integrity concerns. As of January 2024, the Masters and PhD graduate streams had the shortest processing time (30–60 days), while the job offer streams had the longest (120–150 days).
3. Expected time to process an application for permanent residency according to IRCC, as of June 2024.

## Appendix 5: Occupations with Over 100 Nominations Through OINP, 2019–2023

Prepared by the Office of the Auditor General of Ontario

NOC Code	Occupation	OINP Policy Objectives <sup>1</sup>	Total Nominations
2173/21231	Software engineers and designers	Technology	4,362
2174/21230	Computer systems developers and programmers	Technology	1,967
2172/21223	Database analysts and data administrators	Technology	1,522
10022	Advertising, marketing and public relations managers	–	1,475
20012	Computer and information systems managers	Technology	1,370
62020	Food service supervisors	–	1,369
72100	Machinists and machining and tooling inspectors	Skilled Trades	1,346
11100	Financial auditors and accountants	–	1,254
72106	Welders and related machine operators	Skilled Trades	1,079
21232	Software developers and programmers	Technology	1,003
72205	Telecommunications equipment installation and cable television service technicians	Skilled Trades	867
11201	Professional occupations in business management consulting	–	826
2175/21234	Web developers and programmers	Technology	785
73300	Transport truck drivers	Skilled Trades	775
60010	Corporate sales managers	–	673
63202	Bakers	Skilled Trades	614
21311	Computer engineers (except software engineers and designers)	Technology	613
13110	Administrative assistants	–	594
72400	Construction millwrights and industrial mechanics	Skilled Trades	558
72204	Telecommunications line and cable installers and repairers	Skilled Trades	543
63200	Cooks	Skilled Trades	506
72024	Supervisors, motor transport and other ground transit operators	Skilled Trades	506
21211	Data scientists	Technology	497
72310	Carpenters	Skilled Trades	487
22221	User support technicians	Technology	469

<b>NOC Code</b>	<b>Occupation</b>	<b>OINP Policy Objectives<sup>1</sup></b>	<b>Total Nominations</b>
12013	Supervisors, supply chain, tracking and scheduling coordination occupations	–	454
11101	Financial and investment analysts	–	451
11200	Human resources professionals	–	435
31120	Pharmacists	Health	431
2171/21222	Information systems specialists	Technology	405
41200	University professors and lecturers	–	402
13100	Administrative officers	–	377
60030	Restaurant and food service managers	–	373
31301	Registered nurses and registered psychiatric nurses	Health	368
72204	Telecommunications and cable television transmission and distribution systems technicians	Skilled Trades	367
10021	Banking, credit and other investment managers	–	362
22302	Industrial engineering and manufacturing technologists and technicians	Skilled Trades	338
62010	Retail sales supervisors	–	330
31102	General practitioners and family physicians	Health	325
10019	Other administrative services managers	–	319
60020	Retail and wholesale trade managers	–	308
10010	Financial managers	–	280
12200	Accounting technicians and bookkeepers	–	265
73112	Painters and decorators (except interior decorators)	Skilled Trades	262
11202	Professional occupations in advertising, marketing and public relations	–	237
22212	Drafting technologists and technicians	Skilled Trades	235
31110	Dentists	Health	224
73102	Plasterers, drywall installers and finishers and lathers	Skilled Trades	222
10029	Other business services managers	–	218
42202	Early childhood educators and assistants	Skilled Trades	215
70010	Construction managers	–	208
41201	Post-secondary teaching and research assistants	–	204
21301	Mechanical engineers	–	202

<b>NOC Code</b>	<b>Occupation</b>	<b>OINP Policy Objectives<sup>1</sup></b>	<b>Total Nominations</b>
72410	Automotive service technicians, truck and bus mechanics and mechanical repairers	Skilled Trades	200
73110	Roofers and shinglers	Skilled Trades	196
73100	Concrete finishers	Skilled Trades	186
33102	Nurse aides, orderlies and patient service associates	Health	182
22301	Mechanical engineering technologists and technicians	Skilled Trades	181
6331/63201	Butchers retail and wholesale	Skilled Trades	175
21300	Civil engineers	–	171
21310	Electrical and electronics engineers	Technology	168
72101	Tool and die makers	Skilled Trades	168
62100	Technical sales specialists wholesale trade	–	160
72320	Bricklayers	Skilled Trades	160
72311	Cabinetmakers	Skilled Trades	159
72020	Contractors and supervisors, mechanic trades	Skilled Trades	149
10012	Purchasing managers	–	143
41220	Secondary school teachers	–	139
22310	Electrical and electronics engineering technologists and technicians	Technology	138
72014	Contractors and supervisors, other construction trades, installers, repairers and servicers	Skilled Trades	132
72201	Industrial electricians	Skilled Trades	132
73111	Glaziers	Skilled Trades	125
21233	Web designers	Technology	123
72401	Heavy-duty equipment mechanics	Skilled Trades	118
21210	Mathematicians, statisticians and actuaries	–	117
21321	Industrial and manufacturing engineers	–	117
94141	Industrial butchers and meat cutters, poultry preparers and related workers	Skilled Trades	117
22300	Civil engineering technologists and technicians	–	111
62200	Chefs	Skilled Trades	110
20010	Engineering managers	–	109
75110	Construction trades helpers and labourers	Skilled Trades	109
12102	Procurement and purchasing agents and officers	–	108

NOC Code	Occupation	OINP Policy Objectives <sup>1</sup>	Total Nominations
73401	Printing press operators	Skilled Trades	105
22100	Chemical technologists and technicians	–	103
32101	Licensed practical nurses	Health	101
72404	Aircraft mechanics and aircraft inspectors	Skilled Trades	101
<b>Total Nominations with &gt; 100 Nominees per Occupation</b>			<b>39,490</b>
9914	Unknown (New Worker) <sup>2</sup>		4,572
Other Occupations Nominated <sup>3</sup>			6,088
<b>Total Nominations, 2019–2023</b>			<b>50,150</b>

1. Of the 86 occupations with more than 100 nominations, 15% were in the Ministry's priority objective area of technology; 40% were in skilled trades; and 7% were in health. The remaining 38% of these nominations were in occupations outside the Ministry's priority objectives.

2. Occupations (NOC codes) for these nominations are unknown and are categorized by the Ministry as New Worker, a general identifier used for new individuals into the workforce. The immigrant nominee program has typically used the code for international graduate stream nominations (Masters and PhD) when the applicant is not currently employed, NOC information has not been provided, or the applicant is currently not employed in their related field of study.

3. 158 nominations did not include a related NOC code. There are 295 NOCs not listed because they each have less than 100 nominations, for a combined total of 6,088 nominations.

## Appendix 6: Ontario's Top 10 Job Vacancies and Associated OINP Nominations, 2019–2023

Source of data: Statistics Canada, and the Ministry of Labour, Immigration, Training and Skills Development

Occupation <sup>1</sup>	Occupation Category <sup>1</sup>	Vacancies <sup>2</sup>	Rank in Nominations <sup>3</sup>	Total Nominations for Occupation <sup>1</sup>	% of Total OINP Nominations
<b>Registered nurses and registered psychiatric nurses</b>	Health	7,355	29	365	0.9
<b>Nurse aides, orderlies and patient service associates</b>	Health	5,850	51	181	0.5
<b>Licensed practical nurses</b>	Health	4,435	74	101	0.3
<b>Social and community service workers</b>	Education; law and social, community and government services	4,100	148	29	0.1
<b>Transport truck drivers</b>	Trades, transport and equipment operators and related	4,075	12	774	2.0
<b>Cooks</b>	Sales and service	3,725	21	488	1.2
<b>Early childhood educators and assistants</b>	Education, law and social, community and government services	3,260	49	191	0.5
<b>Automotive service technicians, truck and bus mechanics and mechanical repairers</b>	Trades, transport and equipment operators and related	2,325	46	197	0.5
<b>Professional occupations in advertising, marketing and public relations</b>	Business, finance and administration	2,020	56	162	0.4
<b>Retail and wholesale trade managers</b>	Sales and service	1,900	39	251	0.6

1. Identified through National Occupation Code (NOC). Includes only those NOCs eligible through an OINP stream. Nominations exclude the Masters graduate and PhD graduate streams, as relevant occupation data is not available. All other streams are included.

2. Statistics Canada releases job vacancy data on a quarterly basis. Results noted here represent values at the end of the fourth quarter 2023.

3. Out of 337 occupations nominated by OINP from 2019 to 2023.

## Appendix 7: Top 10 OINP Nominations, by Occupation, Compared to Job Vacancies, 2023

Source of data: Statistics Canada, and the Ministry of Labour, Immigration, Training and Skills Development

Occupation <sup>1</sup>	Occupation Category <sup>1</sup>	Nominations	% of Nominations	Vacancies as of 2023 (Q4) <sup>2</sup>	% Change in Vacancies since 2019 (Q4) <sup>2</sup>	Ontario Outlook <sup>4</sup>
<b>Software engineers and designers</b>	Natural and applied sciences and related	1,211	11.4	1,205	(9.1)	Average
<b>Software developers and programmers</b>	Natural and applied sciences and related	831	7.8	1,255	(10.0)	Average
<b>Welders and related machine operators</b>	Trades, transport and equipment operators and related	527	5.0	1,230	39.0	Average
<b>Database analysts and data administrators</b>	Natural and applied sciences and related	447	4.2	375	(15.7)	Average
<b>Computer and information systems managers</b>	Natural and applied sciences and related	409	3.9	775	5.4	Above average
<b>Pharmacists</b>	Health	406	3.8	350	288.9	Average
<b>Telecommunications and cable television transmission and distribution systems technicians</b>	Trades, transport and equipment operators and related	402	3.8	n/a <sup>3</sup>	n/a <sup>3</sup>	Average
<b>Data scientists</b>	Natural and applied sciences and related	370	3.5	390	n/a <sup>3</sup>	Average

Occupation <sup>1</sup>	Occupation Category <sup>1</sup>	Nominations	% of Nominations	Vacancies as of 2023 (Q4) <sup>2</sup>	% Change in Vacancies since 2019 (Q4) <sup>2</sup>	Ontario Outlook <sup>4</sup>
<b>Supervisors, motor transport and other ground transit operators</b>	Trades, transport and equipment operators and related	327	3.1	n/a <sup>3</sup>	n/a <sup>3</sup>	Above average
<b>General practitioners and family physicians</b>	Health	293	2.8	n/a <sup>3</sup>	n/a <sup>3</sup>	Average

1. Identified through National Occupation Code (NOC). Includes only those NOCs eligible through an OINP stream. Nominations exclude Masters graduate and PhD graduate streams as relevant occupation data is not available. All other streams are included.
2. Statistics Canada releases job vacancy data on a quarterly basis. Results noted represent the change of values as of the end of the fourth quarter 2019 and end of the fourth quarter 2023.
3. Statistics Canada noted that the data was too unreliable to publish.
4. The Ministry of Labour, Immigration, Training and Skills Development releases future labour demands in Ontario. The outlook ratings are defined as:
  - Very Low: The number of job openings is significantly lower than in other occupations. Employers will have an easy time integrating new workers. Workers may face excessive job search times.
  - Below Average: There is a relatively lower number of job openings for the size of the occupation. Employers will have a relatively easy time integrating new workers. Workers will face longer than average job search times.
  - Average: Job openings in an occupation are consistent with the wider economy. Employers will experience normal hiring conditions. Workers will face normal job search times.
  - Above average: Job openings in an occupation are relatively higher than in other occupations. Employers will experience more difficulty hiring and integrating workers. Workers will face shorter job search times with increased opportunities.
  - Very high: Job openings in an occupation are significantly higher than in other occupations. Employers will face difficulty hiring and integrating workers and may need to look to attract workers from less common sources. Workers will experience significant employment opportunities.

## Appendix 8: OINP Employer Job Offer Nominations, by Geographic Region and Census Division, 2019–2023

Prepared by the Office of the Auditor General of Ontario

Geographic Region	Nomination #*	Nomination %
<b>Greater Toronto Area</b>	<b>6,923</b>	<b>63.2</b>
City of Toronto	2,936	26.8
Peel	2,173	19.8
York	1,374	12.5
Halton	340	3.1
Durham	91	0.8
Not specified	9	0.1
<b>Central</b>	<b>1,790</b>	<b>16.3</b>
Waterloo	619	5.7
Niagara	309	2.8
Simcoe	247	2.3
Wellington	234	2.1
Hamilton	190	1.7
Muskoka	100	0.9
Hamilton-Wentworth	50	0.5
Dufferin	40	0.4
Not specified	1	0.0
<b>South</b>	<b>1,055</b>	<b>9.6</b>
Middlesex	377	3.4
Essex	189	1.7
Brant	117	1.1
Oxford	89	0.8
Chatham-Kent	72	0.7
Perth	65	0.6
Grey	53	0.5
Lambton	44	0.4
Bruce	29	0.3
Elgin	15	0.1
Huron	5	0.0
<b>East</b>	<b>909</b>	<b>8.3</b>
Ottawa-Carleton	528	4.8

Geographic Region	Nomination #*	Nomination %
Hastings	129	1.2
Frontenac	79	0.7
Stormont, Dundas and Glengarry	60	0.5
Ottawa	31	0.3
Peterborough	27	0.2
Renfrew	17	0.2
Northumberland	15	0.1
Leeds and Grenville	9	0.1
Lanark	8	0.1
Prescott & Russell	5	0.0
Not specified	1	0.0
<b>North</b>	<b>272</b>	<b>2.5</b>
Sudbury	96	0.9
Thunder Bay	62	0.6
Kenora	25	0.2
Cochrane	23	0.2
Nipissing	21	0.2
Parry Sound	18	0.2
Algoma	15	0.1
Rainy River	7	0.1
Manitoulin	5	0.0
<b>Total</b>	<b>10,949</b>	<b>100</b>

\* Data excludes 2,956 (21.3%) nominees with missing or inconsistent geographic information.

## Appendix 9: Ontario's Top Five Vacancy Increases in Occupations, and Corresponding Nominations, by Geographic Region, 2019–2023

Prepared by the Office of the Auditor General of Ontario

National Occupational Classification (NOC)		2019 Vacancies*	2023 Vacancies*	5-Year Vacancy Change	OINP Nominations over 5 years
<b>Greater Toronto Area</b>					
31301	Registered nurses and registered psychiatric nurses	2,185	4,455	2,270	17
42202	Early childhood educators and assistants	525	2,080	1,555	84
33102	Nurse aides, orderlies and patient service associates	1,040	2,380	1,340	9
42201	Social and community service workers	780	1,920	1,140	6
32101	Licensed practical nurses	540	1,665	1,125	10
<b>Central</b>					
31301	Registered nurses and registered psychiatric nurses	860	2,590	1,730	11
32101	Licensed practical nurses	475	1,735	1,260	11
33102	Nurse aides, orderlies and patient service associates	1,290	1,995	705	31
63200	Cooks	300	915	615	84
65310	Light duty cleaners	390	830	440	0
<b>South</b>					
65201	Food counter attendants, kitchen helpers and related support	830	1,565	735	0
32101	Licensed practical nurses	250	630	380	9
72400	Construction millwrights and industrial mechanics	90	235	145	2
42201	Social and community service workers	45	185	140	1
31301	Registered nurses and registered psychiatric nurses	300	425	125	2
<b>East</b>					
33102	Nurse aides, orderlies and patient service associates	485	1,280	795	9
65201	Food counter attendants, kitchen helpers and related support	1,925	2,635	710	0

National Occupational Classification (NOC)		2019 Vacancies*	2023 Vacancies*	5-Year Vacancy Change	OINP Nominations over 5 years
31301	Registered nurses and registered psychiatric nurses	425	1,110	685	4
32101	Licensed practical nurses	155	765	610	7
75101	Material handlers	10	295	285	0
<b>North</b>					
42201	Social and community service workers	325	1,055	730	1
31301	Registered nurses and registered psychiatric nurses	210	805	595	5
32101	Licensed practical nurses	160	635	475	6
33102	Nurse aides, orderlies and patient service associates	395	820	425	11
65310	Light duty cleaners	125	330	205	0

\* Reflects the total at the end of the fourth quarter of each year.



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