



Settlement Sector Service Delivery during COVID-19: Questions to IRCC NHQ

CISSA-ACSEI has compiled an ongoing list of questions that have emerged from members across Canada in conjunction with OCASI in response to service delivery operations during COVID-19. We submit the following questions for IRCC NHQ responses and if necessary, for additional functional guidance to the Regions.

1. Is it possible for IRCC to decouple the CA administration fee contribution negotiated at the beginning from downward Program Delivery fluctuations?

On questions with respect to CA's – we are examining all potential flexibilities. We will discuss these internally and certainly get back to you in due course. We are doing all we can to support the Sector inside the authorities that we have. (We are awaiting official wording but this has been approved for FY 2020-2021 and functional guidance has already been sent to the Regions)

2. Can service partners/employers gain the authorization, if they choose, to pay out any staff vacation time balances carried over from 2019, so as not to accumulate high balances of accrued vacations that staff will postpone taking until they are back at work?

As it is early days in the COVID-19 response, it is difficult to determine the full extent that these unprecedented circumstances will have on the vacation payout issue raised. Under our program guidelines, payout of accrued vacation leave is currently not an eligible expense. That being said, IRCC would like to revisit this issue in 4-6 months after the overall effects of the pandemic on the Settlement sector are more known.

Please note: If there are any flexibilities related to the payout of accrued vacation leave, they will not apply to Contribution Agreements that have already expired.

3. Re LINC supply instructors – are LINC providers expected to fund supply or substitute teachers from LINC CA slippage?

Supply teachers across the settlement network continue to be funded from slippage. We do not currently foresee altering this funding process.



4. If Employer's wanted could they provide a time limited wage supplement eg between 10 and 20% for 3+ months starting April 1 under their respective RAP CA's? Would IRCC NHQ support this request? We understand that other essential service staff are being offered various wage supplements during COVID-19 in recognition of the additional service delivery risks.

IRCC's priority is the well-being, safety and security of clients and staff and accordingly is encouraging adjustments to policies and procedures to reduce social contact. While some critical services can be provided virtually, other services, especially for vulnerable clients, including case management supports, require in-person program delivery. As such, service provider organizations have asked for support as they provide these services in very challenging environments.

On April 21, 2020, IRCC regional offices shared guidance with service provider organizations that the Department will support recipient requests for an increase of up to 15% in staff wages for front line staff delivering critical in-person services. The wage increase can be funded from existing contribution agreements for the period between April 1 to June 30, 2020, with the possibility of extension.

5. Greater CA flexibility requested;

As service partners transition past service activities, programs and classes online, through the creative use of technology, can we have greater flexibility to purchase IT related equipment or undertake new communication approaches e.g. texting clients even though these items were not originally identified and/or improved in our respective CA's?

On questions with respect to CA's – we are examining all potential flexibilities. We will discuss these internally and certainly get back to you in due course. We are doing all we can to support the Sector inside the authorities that we have.

6. The role of provincial umbrella associations during COVID-19;

We feel there is tremendous value in building upon some of the local or regional initiatives by umbrella associations on a national basis to help ensure consistent messaging and access to resources, staff training, webinars, etc. Can umbrella associations that submitted various national initiatives that were not funded be reconsidered and/or adjusted in response to COVID-19?

In the interest of fairness and transparency, the Department cannot re-assess any CFP 2019 proposals against new or different priorities. Therefore, funding decisions regarding CFP 2019 proposals are final. Some



applicants may choose to submit a new unsolicited concept that builds upon a CFP 2019 proposal that was not approved. However, this concept would have to be sufficiently different from the CFP 2019 proposal, and would have to be clearly focused on addressing COVID-19 concerns. Concepts can be sent to CFP@cic.gc.ca.

We have streamlined our process to ensure that COVID-19 related unsolicited proposals can be processed as quickly as possible.

7. Increase Service Demands from across Canada for Non-Eligible IRCC clients;

Is it possible for service providers, even for a specific time frame, to support the various COVID-19 related needs emerging from temporary residents (e.g. TFW's, International Students, Refugee Claimants and some naturalized citizens)?

On questions with respect to Program eligibility – that is a very challenging area for us. Currently, we are not in a position to broaden the eligibility for the Program; it requires a decision from Cabinet. And, further, we simply do not have the funding in the Settlement Envelope to support any broadening, even in the short term.

8. GAR arrival flow – does IRCC intent to meet 2020 targets?

RAP service providers are seeking clarity from IRCC in regard to the GAR flow and the targets for 2020, as this will have implications on infrastructure, housing and staffing. Should we be preparing for Fall arrival surges?

9. Ability to obtain personal protection gear for agency employees and RAP clients residing in temporary accommodation

Following Public Safety Canada guidance on essential services and functions in Canada, IRCC service partners are seeking clarification on what Personal Protective Equipment (PPE) is need for frontline staff, RAP clients living in temporary accommodation and equally importantly, where to source this equipment?

Would IRCC NHQ be able to assist essential service settlement providers on a national basis in gaining access to PPE, for example through designation of a specific supplier that service partners could place



online orders? It was also recommended that training be offered to frontline essential staff members on how to use PPE and for example, what to do following a shift before going home. Is it possible for one of the provincial umbrella associations to receive IRCC funding to create a national training video and/or host several national webinar(s) to orient front-line staff, etc across Canada?

On PPE – obviously, this is an important and critical line of questioning. As you know, PPE has been challenging in terms of the supply chain – we have been having some challenges for our frontline staff. That said, much progress has been made. I can confirm that we are exploring this request internally and will circle back when we have a bit more information. I can't make any commitments, but we are committed to exploring it and doing whatever we can to support the Sector and the frontline workers and clients.

10. The Potential Impact of 2020 PR landings and future Regional funding allocations e.g. Settlement Allocation Model (SAM);

Looking ahead to FY 2 (2021-2022), are you able to provide any clarification on how IRCC NHQ will be using SAM to allocate future regional funding as a result of anticipated reduced PR landings in 2020?

On questions with respect to landings, immigration levels, funding formula – these are challenging questions to answer at this point, given the evolving nature of the context in which we are all living and working. I would propose that we add this to the agenda for our next NSIC call, and I am happy to address these issues at a broader, strategic level. They are important questions, and we need to think about them – for obvious reasons. Some, as you know, require a decision from the Minister and/or Government and the timing is premature to seek those decisions. I'm happy to discuss at the next NSIC call so that information is shared across the country. It will be an ongoing conversation, but it's important that we start it, and that we keep it going as the situation evolves, and as the Government and the Minister make required decisions, in particular around immigration levels, and as we get a better line of sight on when the immigration program will open up and landings will resume.

11. The Lack of and access to technology eg computers, iPads for at risk vulnerable refugee newcomers limits their settlement and integration process.

This is more of a statement than what is assumed possible under IRCC mandate. The inability of refugees, in particular, to have access to computers, iPads, home internet, etc limits their ability to



access virtual support, information, participate in online classes, complete various government online applications/processes, etc. We wonder if this is a role for the Minister on our behalf to engage with technology and telecommunication companies?

On technology questions – you have raised this a number of times, including directly with the Minister. I am not in a position to pursue this as it is clearly outside my lines of authority. I would recommend you follow up with the Minister and his office to see if he is able to support this request.

12. Question related to retention and disposal of client information:

Within CA's ending March 31, 2020 there is a clause that asks for recipient plans for:

- Confirmation that appropriate steps were taken to ensure proper retention and/or disposal of files:
 - ∅ As per section 6.5 of the agreement, please note that paper and electronic records pertaining to the agreement must be kept for 7 years after the agreement end date, except for protected personal client information:
 - o Protected personal client information that has been entered into iCARE should be immediately disposed of at the end of the agreement, in a secure and classified manner. This would be any information such as full name, date of birth, etc.
 - o Methods of disposal for paper records include incinerating or shredding.
 - o Please note that I will require written confirmation that all protected information has been properly disposed of.
 - o All records related to Third Parties you have contracted with you for products or series subject to the agreement (if applicable)

Due date: ASAP or before May 31, 2020

According to the instruction, at the end of the contract, all documents (paper and electronic) that have client personal information on them need to be disposed of. This would mean shredding all paper files for clients that won't be continuing into the new contract and somehow deleting the client personal information from various service providers' database systems.

In short, these new requirements outlined above make no sense and unintentionally contradict each other.

On the one hand, IRCC wants CA holders to keep records for 7 years. On the other hand, IRCC wants any record (paper / electronic) containing personal identifying information (name, birth date, FOSS) to be immediately deleted. The problem is that there would never be a record that did not contain some



type of identifying information. So in essence, IRCC is asking CA holders to delete everything unless the individual has accessed services by the date this report is submitted (ie April 30).

With respect to timing, many of these tasks cannot be carried out within the context of the current shutdown owing to capacity (e.g. lack of staff working in offices, need for IT to be focused on supporting tech issues in transitioning to online service delivery). This could be done within 6-8 weeks of returning to post COVID-19 normal operations.

Due to the unprecedented nature of the COVID-19, IRCC recognizes that “business as usual” is currently challenging. Recipients should discuss with their Program Officer if there are any retention and disposal related activities that cannot be completed at the present time due to the pandemic.

With respect to the retention and disposal of project-related records:

- Article 6.5 E) of the CA further explains that documents pertaining to a CA, both financial and non-financial, must be retained during the entire term of the agreement and for seven (7) years afterwards, This is necessary in order to meet the requirements of the Canada Revenue Agency and of IRCC’s *Retention and Disposition Schedule (RDS)* for Grants and Contributions management. The records that must be retained may include, but not limited to, the signed CA itself and any amendments thereto, claims for reimbursement and supporting documentation, progress reports, and any agreement with third parties for provision of services or space.
- There is an exception to retention and disposal related to protected personal information. You may refer to article 6.5 E) of the CA which states that “*protected information must be retained only for as long as the client continues to receive services, after which all copies of the record must be immediately destroyed. The manner of destruction must be appropriate to the level of classification or designation and the storage media in which it has been retained. If the Recipient is required to maintain the record for uses outside of the Agreement, all identifying information specific to the Department must be removed.*” Recipients can determine when a client is no longer accessing services, based on their knowledge of each case. Once the client is no longer accessing services their personal information should be destroyed. Personal information includes: Unique identifier; date of birth; family name, given name(s); contact information: country, telephone number, email address; and settlement and resettlement services information, including support services, when combined with the above elements. If the recipient is required to retain the protected information beyond either of the above retention periods for purposes outside of IRCC-funded activities, for example services provided to clients through other funders, all IRCC-specific client identification information must be removed from the record, including from third parties. Once disposal takes place, recipients should notify IRCC of the disposition of protected information.
- IRCC has the legal obligation to ensure that information is maintained, retained and disposed of in accordance with the requirements of the Privacy Act. Since funding recipients have a CA with IRCC, this legal requirement extends to them, as well as any third party involved in



delivering the IRCC-funded project. Once the retention period is over, records must be disposed of as appropriate for the type of information that has been retained and the storage media in which it has been retained. Electronic devices and assets with hard drives containing protected personal client information must be overwritten using current industry standard data erasure software.

13. Information Request by some IRCC settlement officers in some Regions

Some folks are receiving messages like below from their IRCC settlement officers. Is this just a Regional initiative/request or will every CA holder across Canada receive such a request? Could you explain the context for the information requested?

Good afternoon,

The Settlement Network Atlantic has been asked to collect information regarding the delivery of settlement services in the region during the COVID-19 pandemic. To inform this exercise, we kindly ask that you respond to the following questions by **tomorrow at 10 AM (Thursday, April 16)**.

Please note, these questions are related to **IRCC-funded** settlement sites and/or services only.

- 1) Are any of your sites/locations currently closed?
- 2) What % of your staff, if any, are teleworking?
- 3) What services (Needs and Asset Assessment and Referrals, Language Training, Information and Orientation, Community Connections, Employment Related) are you continuing to deliver? In what format are they being delivered?
- 4) What services have you ceased delivering?
- 5) What % of your services are being delivered to high needs/vulnerable clients?
- 6) What innovations, if any, have you introduced?
- 7) What supports/tools do you need to introduce or expand remote/at-a-distance services?
- 8) If these supports/tools were provided, what % of your staff would be available to work remotely?

Our sincere apologies on the short timeframe for this request. We greatly appreciate the information you are able to provide.

We'd like to put together some baseline data, across the country, on getting a sense of the overall capacity of the Sector. The purpose is to help us situate the "recovery period" and to ensure we calibrate the recovery of the immigration program with the capacity of the Settlement Sector. I am especially focused on resettlement; as we do not know when borders will open, when flights will resume and when our visa officers will be re-deployed around the world to begin processing again, so it's key that we focus on the pacing of landings, and calibrate those landings with capacity.



This data will also help us better understand the potential need for incremental costs.

We can adjust the time lines – there is no “urgency” to this request, and we can provide additional context to the Sector, if that’s helpful.

14. Possible implications arising from IRCC extending APPR deadline to August 31, 2020.

If service providers wish to avail of the extension deadline for APPR, does this mean the 5% hold back will also be adjusted to when the provider submits their report?

The deadline for the **Annual Project Performance Report (APPR)** and **Annual Performance Report of Community Partnerships (APRCP)** have been extended to August 31st, 2020 to allow more time for Service Provider Organizations to complete the year-end reports.

With respect to the **APPR: Content should be limited to one answer per question**, to streamline reporting; These **reports are crucial** in supporting policy direction and design, as well as providing important data for evaluations etc., therefore we request that **agencies complete and submit** the final reports in a timely manner; Although the reports will not be linked to the Contribution Agreement closing process and therefore not linked to the release of the final payments, **officers will have until September 30th** to review and approve the reports in iCARE; Service Provider organizations may also wish to provide **information on efforts to address COVID-19 including challenges and solutions. NOTE: APPR reports are submitted in iCARE.**

With respect to the **APRCP:**

The Syria Annex is **no longer required**; and Service Provider Organizations may wish to provide **information on efforts to address COVID-19 including challenges and solutions. NOTE: APRCP reports are submitted to Settlement Network officers.**

15. RAP and IFHP related issues surfacing during COVID 19 physical distancing restrictions:

IFHP

Clients are waiting for adaptive equipment like wheelchairs, leg brace, orthotic inserts, and specialty footwear. Most equipment is custom made, specific to client, and covered under IFHP, with the usual waiting time of several months from assessment and measurements until the client receives the equipment. Right now, with COVID-19 clients will wait longer because these are not seen as essential services for the hospital. We are concerned their IFH coverage will expire and clients won’t have the proper equipment they need.



Question: Will IRCC/IFHP extend coverage and honor approvals for cost of equipment even if client is beyond 1 year?

Additional IFHP coverage related to home delivery fees for medical supplies and equipment.

Rationale: Coverage for costs associated with home delivery costs of medical supplies and equipment allows GARs with already compromised health to receive the medical supplies and equipment that they need without the added risk of exposure to COVID-19. Delivery cost is between \$5.00 and \$25.00 depending on area and service provider.

Additional IFHP coverage related to the delivery of psychology counselling services through telephone and online/virtual means. Rationale: Coverage for costs associated with tele-counselling and/or online-counselling services allows clients to receive much needed mental health related support when in-person appointments are not available due to the global COVID-19 pandemic. Cost is the same as in person delivery of service.

Add IFHP coverage for thermometer. Rationale: many clients don't have thermometers and they need them to monitor temperatures for potential COVID-19 related symptoms. Clients have reported they can't find them in stores, and don't know how or don't have ability to order online. Estimated cost is \$15-\$30.

16. RAP Income Support – COVID-19 – Provincial supplemental allowances

Clients on Provincial Income Assistance may be eligible for supplemental allowance either one time or for a period of time (Nova Scotia - one-time payment of \$50 per individual to support them with COVID 19 – prevention strategies (soap and cleaning supplies) and in BC \$300 each month initially from April-June). Is IRCC planning to match these provincial initiatives?

As of May 4, 2020