



## **IRCC Consultation on Category Based Selection within Express Entry**

### **Written Submission from World Education Services**

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#### **About WES**

World Education Services (WES) is a non-profit social enterprise dedicated to helping international students, immigrants, and refugees achieve their educational and career goals in Canada and the United States. For more than 45 years, WES has set the standard of excellence in the field of international academic credential evaluation. Through WES Global Talent Bridge, the organization joins with institutional partners, community-based organizations, and policy makers to help immigrants and refugees who hold international credentials fully utilize their talents and education to achieve their academic and professional goals. Its philanthropic arm, the WES Mariam Assefa Fund, supports catalytic leaders and organizations working to build inclusive economies and to ensure that immigrants and refugees can achieve their aspirations and thrive. Since 2013, WES has been a designated provider of Educational Credential Assessments (ECAs) for Immigration, Refugees and Citizenship Canada (IRCC).



WES appreciates IRCC's efforts in conducting a review of the newly introduced of category-based selection (CBS) draws from the Express Entry pool to ensure that Canada's economic immigration system is responsive to changing economic and labour market needs. We share the Government of Canada's goal of "positioning our immigration system for the future to the benefit of all Canadians." In line with IRCC's vision, WES recommends a review of category-based selection (CBS) policy guided by the principles of transparency, accountability, and equity.

## Summary of Recommendations

1. Establish a permanent working group or task force with representatives from labour, business, and the not-for-profit sector to provide real-time input about labour market needs.
2. Improve transparency about the objectives of CBS. For each selection priority, relevant industries, service providers, and potential applicants should know whether the draw is designed as a pathway to permanent residence for temporary residents or a pathway to bring new people with specific occupational skills into the country.
3. Create a case-managed approach to selecting and settling individuals through CBS draws.
  - a. Design a process to allow IRCC, in cooperation with provinces/territories and regulatory bodies, to ensure prior to selection that there is a viable pathway to licensure for each candidate in regulated professions and trades (who are not already licensed in Canada) based on their specific circumstances.
  - b. Provide applicants with the necessary information about their specific pathway and directly connect individuals to the appropriate bodies and supports to pursue licensure.
4. Work with provincial or territorial governments and regulatory bodies to create clear, fast pathways to licensure for each licensed occupation. These pathways are a necessary precursor to recruiting new workers in licensed occupations.
5. Create an independent oversight body to monitor category-based selections and report to parliament in a timely manner.
6. Establish a national committee of diverse stakeholders (including newcomers, employers, licensing bodies, and immigration/settlement sector bodies) to promote leading practices to address the underutilization of the newcomer talent.
7. Ensure that prospective immigrants have information regarding their prospect for commensurate employment that is realistic, accurate, and timely.

## Linking Selection Policy to Economic Inclusion

There is a risk that CBS, as it has been operated since its implementation in September 2023, will not meet its **stated objective** to "make Express Entry more responsive to Canada's changing economic and labour market needs." This is because Canada lacks adequate structures to ensure that newcomers get information about licensure, get licensed, and enter the labour market in a job commensurate with their experience.



The lack of information about licensure and the lack of expedient licensure processes is particularly problematic in the context of CBS. The effort of selecting people to increase the pool of available workers in Canada experienced in occupations with shortages will go to waste if those individuals are not able to work in their field. Many of the occupations in STEM, health, and trades sectors included in the 2024 priority occupations for CBS are licensed professions. It is essential that people selected for the purpose of filling labour market gaps are actually able to do so.

A great deal of evidence documents the challenges that exist in the pathway to licensure and work for newcomers with a background in a regulated profession. A [WES report](#), published in 2019, demonstrated that immigrants who wish to work in regulated occupations experienced lower rates of employment than respondents who work in non-regulated occupations. In 2015, the Ontario Society of Professional Engineers found that [only one in five internationally trained engineers](#) in Canada works in their field of training. According to [TRIEC](#), more than 50 percent of immigrants trained in the science, technology, engineering, and mathematics (STEM) field do not work in STEM occupations.

These problems are similarly entrenched within the health care sector—a sector that has, until now, been a priority for CBS. Thousands of internationally educated health professionals (IEHPs), including physicians, nurses, and allied health practitioners, struggle with barriers to reentering and advancing in their professions. The ability of a newcomer to actually become licensed in Canada in their profession [depends on a number of factors](#), including their specialty, the country where they were trained, and their recency of practice. According to [Statistics Canada](#), in 2020, 47 percent of immigrants who received their health care education abroad were unemployed or employed in positions that did not make full use of their skills, education, and experience. There have been recent advancements in the licensing process for doctors and nurses in many provinces, but many newcomers may still be delayed or excluded from practicing in the medical field.

Without a change of course, WES is concerned that the CBS may, in practice, not fulfill its purpose. It may not address labour market demand, if selected newcomers are precluded from working in shortage occupations. And it may increase the pool of newcomers in Canada who cannot work in the occupation they are trained for and wish to work in. Unfortunately, to date CBS has not been complemented with an end-to-end plan to ensure that immigrants quickly find work commensurate to their education and experience.

IRCC and ESDC branches that work on policies related to selection, settlement, employment, and licensing, must work in collaboration to design a system that can both select and integrate people for the purposes of meeting employers' demand for specific skillsets. The chances of successful labour market integration depend on the licensure process itself. WES has long advocated for effective and equitable licensure processes. However, successful licensure also varies from one candidate to the next based on individual characteristics. WES encourages IRCC to adopt a case management approach to CBS to verify that each person who will receive an invitation to apply will be able to meet the criteria of the licensing body, unless that person is already licensed in Canada. This case management system needs to be in place before selecting newcomers outside Canada



on the basis of their experience in licensed occupations. As elaborated below, WES calls for a rigorous monitoring and evaluation plan to provide insight into whether CBS is having its intended impact.

## A Data-Driven Approach

It is difficult to make recommendations about future selection priorities within CBS because of a lack of data on how it has operated over the past 18 months. There is also limited transparency on whether each type of CBS draw is intended as a pathway to permanent residence for current temporary residents, thus securing the existing labour force in an occupation or priority area, or as a way to increase the supply of new workers in Canada to meet labour market need.

As of July 2024, there is [no Express Entry Year End Report](#) for the year 2023. At the time of CBS draws, there are IRCC announcements stating the number of invitations to apply issued, but no context is given about how many individuals were invited for each occupation. Occupation-specific data is significant because the extent of the labour force gaps, as well as the pathways to licensure, vary from occupation to occupation. [Publicly available data on Express Entry](#) do not provide any clarity on which candidates were invited through a CBS draw. There has been no information on the proportion of people invited through a CBS draw who are in Canada versus new immigrants from abroad. Finally, there are no reports on the employment outcomes of people invited through CBS.

Without greater clarity on program objectives and outcomes, the public and key partners have limited insight with which to inform future CBS priorities. However, as explained above, there is reason to be concerned that CBS will not be successful reducing shortages in occupations that are licensed professions.

During the 2023 consultations about CBS, [WES recommended](#) the establishment of three bodies to inform and monitor the new CBS draws to ensure program success: a permanent working group or task force to provide input about labour market needs, a national committee to improve economic inclusion of newcomers, and an independent oversight body to monitor and report on CBS outcomes. If implemented, these bodies would help create a CBS system that can identify objectives, create programs and practices to deliver on those objectives, and measure those objectives to inform future operations. As IRCC proceeds with a consultation on the future of CBS, WES would like to reiterate the importance of these three recommendations, which remain salient today.

## Transitioning Temporary Residents to Permanent Residents

There is a current urgent need for a dedicated pathway to permanent residence for the large number of temporary residents. The population of non-permanent residents reached [2.8 million](#) in



the second quarter of 2024. Many people with temporary residence have been in Canada for a long period of time. Temporary residents frequently work in industries that face either labour shortages or would face labour shortages without temporary resident employees. This means that temporary residents are filling structural gaps in Canada's economy, but without the same rights and protections as other members of the Canadian labour force.

Transition to permanent residence should account for a substantial portion of economic immigration programs in the coming years. CBS can play a role in facilitating the transition from temporary to permanent residence. This could be achieved two ways: either by selecting individuals already working in Canada in occupations with shortages or by making a TR-to-PR pathway a standalone priority within CBS. The size of programs that serve as a pathway to permanent residence for temporary residents can be recalibrated if/as the number of temporary residents declines in coming years.