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Sent: January 25, 2024 12:32 PM
To: IRCC.F CPCEExtendedManagers / GestionnairesEtendusCPCE F.IRCC
Subject: Guidance on request letters and the use of IELTS

OPS Managers/Supervisors,

In order to ensure consistency in processing, the following reminders are being provided. Please ensure these are distributed to your officers. We will discuss at the next extended management meeting.

- 1) Request letters: application guides provide clients with the information necessary to submit a complete application. In some exceptional circumstances, should it be required, officers may request additional documents. In circumstances where an officer requires the client to submit additional documents, the officer **must enter a note in the application explaining the concern** which led to the document request and **assign the file to themselves with an appropriate due date**. It is that officer's responsibility to follow-up with that file.
- 2) Language requirements for work permit extensions: as you know, R200(3)(a) states that: *"An officer shall not issue a work permit to a foreign national if there are reasonable grounds to believe that the foreign national is unable to perform the work sought."*

When processing Work Permit Extensions, officers must still be satisfied of this Regulation; however it is important to remember that, when processing an WP-EXT for the same employer, another officer was already satisfied that the applicant could perform the work and the employer is satisfied that they are conducting that work.

Regarding language, while not impossible, it would be rare that an officer processing a work permit extension for an applicant who has not changed employer, not be satisfied that the applicant can perform the work because of a lack of language and request IELTS results. In these exceptional situations, the officer would need to clearly identify in the notes why this is being required for a work permit extension and what information has come to their attention to suggest that the client is no longer able to perform the work they are already doing because of language. IELTS are not an appropriate method for attempting to validate a suspicion that a person may not be working for an employer.

Article 16 requires that an applicant must provide any documents or evidence reasonably required; however it is **incumbent on the officer** to document in notes what evidence is required and why in order to meet the standard of reasonableness. Guidance on assessing language requirements for work permit applications can be found [here](#).

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