Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
Information disclosed under the Access to Information Act
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Request to IPG - Functional Guidance Form

Formulaire de demande d'orientation fonctionnelle – Demande à l'OPI[i]

Date : 03/09/2025

A- To be completed by the requester/À remplir par l'auteur de la demande.

When complete send to / Une fois rempli, l'envoyer à : IRCC.IPGFunctionalGuidance-OrientationFonctionnelleOPI.IRCC@cic.gc.ca

Office / Bureau : IROD -- PR team	Email address/Adresse de courriel : brendan.mckendy@cic.gc.ca
Branch / Direction générale : Immigration Operations (IOB)	Division/Unit / Division/Unité : Service Delivery (SDS)
Category / Catégorie : Permanent Resident/ Résidents permanents	
Context/Contexte : Express entry -- candidates with high-skill work experience.	
Class or program name / Catégorie ou nom de programme : Canadian Experience Class	
Background /Recherche préliminaire : Express Entry PDI -- http://cicintranet.ci.gc.ca/connexion/tools-outils/perm/express/refuse-eng.aspx#qualification Ministerial Instructions Respecting Express Entry (section 26) -- https://www.canada.ca/en/immigration-refugees-citizenship/corporate/mandate/policies-operational-instructions-agreements/ministerial-instructions/express-entry-application-management-system/current.html Ontario Guide to Pesticide Licensing: https://www.ontario.ca/page/guide-pesticide-licensing Ambiguous statement from the Immigration Reps mailbox: https://gcdocs2.ci.gc.ca/otcs/cs.exe?func=ll&objId=598672117&objAction=viewheader Provide background research that was completed. (ie Manuals, PDI, IRPA Regs etc.)/Indiquer la recherche préliminaire qui a été effectuée (c.-à-d. guides, IEP, LIPR, dispositions réglementaires, etc.)	
Is this a request for clarification from a previous question, if so please provide the ticket number of the previous request / S'il s'agit d'une demande de clarification d'une question déjà posée, fournir le numéro de billet de la demande précédente : No	
Is your question pertaining to instructions found in a PDI? If so, provide the PDI URL for reference / Si la question porte sur des instructions données dans des IEP, fournir l'adresse URL des IEP à titre de référence : Express Entry PDI -- http://cicintranet.ci.gc.ca/connexion/tools-outils/perm/express/refuse-eng.aspx#qualification	
Urgent Request/Demande urgente : ☐	Reason for Urgent Request/Raison pour laquelle la demande est urgente : Provide details (ie. Presentation; Litigation etc)/Fournir des détails (c.-à-d. présentation, litige, etc.)
Question We have seen some express entry applicants who declare an Ontario exterminator license as a certificate of qualification in a trade occupation, so they can get 50 extra CRS points. After searching this kind of license online, I believe that it might not be a meaningful qualification, and it might be easy to get the license with no experience and just a few days of studying.	

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Ministerial Instructions ask for "a certificate of qualification in a trade occupation issued by a competent provincial or federal authority." This license is not what the province calls a "certificate of qualification," but it is arguably a certificate that shows a qualification. Pest control (73202) is one of the professions eligible for the 50 points. Is an Ontario exterminator license a valid certificate of qualification?
Supervisor / Superviseur : Katya Mikhaylichenko <Ekaterina.Mikhaylichenko@cic.gc.ca>

Date : 10/09/2025

B- To be completed by IPG advisors/à remplir par les conseillers de l'OPI.

When complete send to / Un fois rempli, l'envoyer à : IRCC.IPGFunctionalGuidance-OrientationFonctionnelleOPI.IRCC@cic.gc.ca

Tracking #/N° de suivi : FG-2025-0182		
Division : Skilled Workers and Business Policy	Unit /Unité : Skilled Workers and Business Program Guidance team	Advisor / Conseiller(ère) : Xochitl Lopez
Answer approved by / Réponse approuvée par : Marie Geralde Georges		
Consulted/Personnes consultées : Talia Santilli		

Answer/Réponse

To be assigned comprehensive ranking system (CRS) points for a certificate of qualification (CoQ), the CoQ must:

- Be in a trade occupation,
- Be for one of the eligible occupations,
- Be issued by a competent provincial or federal authority,
- Demonstrate that the applicant has passed all requirements to be qualified in a particular trade in a province or territory in Canada, or to be designated as the overall responsible operator or as an operator-in-charge, and
- Meet all the requirements outlined in section 26 of the Ministerial Instructions respecting the Express Entry system.

For further details, please refer to IRCC's Express Entry: Assessing an electronic application on section A11.2 - Canada.ca, which outlines the criteria for Certificates of Qualification and competent authorities.

Per a cursory open source search:

1. NOC 2021 Version 1.0 - 73202 - Pest controllers and fumigators - Unit Group appears to be "73" general trades.
2. Appears on the eligible occupations list per the PDI
3. Appears to be issued by a by a competent provincial or federal authority under Pesticides Act, R.S.O. 1990, c. P.11 | ontario.ca
4. It appears that an exterminator licence is required to apply pesticides commercially on any property that the applicant or their employer does not own or farm

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Please note that the requirement that the person who hears must decide, does not prevent a decision maker from seeking advice before making a final decision; however, the record of decision should indicate that, after assessing all relevant factors, the decision maker came to their own conclusion. Advice received from program guidance teams can be used by the decision maker as guidance in applying the applicable provisions of the IRPA and IRPR to the facts of the specific application. If a decision maker makes a decision because of direction by a manager, headquarters or a procedures manual, they restrain or "fetter" their discretion.

Please read in conjunction with Decision making: Standard of review and process for making a reasonable decision and Procedural fairness

Thank you for highlighting this trend. We will make every effort to incorporate this information into our upcoming Express Entry policy review. Please continue to share observations like these—they're invaluable to our work.

Status/État :	Closed/Fermé ☑	Instructions to be updated/Instructions à mettre à jour ☐

[i] Please do not paste reference emails into the body of this form. You may attach emails or additional documentation to your query email.
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Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
Information disclosed under the Access to Information Act
L'information divulguée en vertu de la loi sur l'accès à l'information

Request to EFSI - Functional Guidance Form

Formulaire de demande d'orientation fonctionnelle – Demande à l'IEFS[i]

Date : 06/10/2025

A- To be completed by the requester/À remplir par l'auteur de la demande.

When complete send to / Une fois rempli, l'envoyer à : IRCC.EFSIFunctionalGuidance-OrientationFonctionnelleIEFS.IRCC@cic.gc.ca

Office / Bureau : IROD – PR Team	Email address/Adresse de courriel : nickelia.adams@cic.gc.ca
Branch / Direction générale : IOB	Division/Unit / Division/Unité : Service Delivery
Category / Catégorie : Permanent Resident/ Résidents permanents	
Context/Contexte : Express entry -- candidates with high-skill work experience.	
Class or program name / Catégorie ou nom de programme : Canadian Experience Class	
Background /Recherche préliminaire : PDI : Express Entry: Assessing an electronic application on section A11.2; Ministerial Instructions Respecting Express Entry (section 26): https://www.canada.ca/en/immigration-refugees-citizenship/corporate/mandate/policies-operational-instructions-agreements/ministerial-instructions/express-entry-application-management-system/current.html Canadian Fire Alarm Association: https://cfaa.ca/ Skilled Trades Ontario: https://www.skilledtradesontario.ca/trade-information/sprinkler-and-fire-protection-installer/	
Is this a request for clarification from a previous question, if so please provide the ticket number of the previous request / S'il s'agit d'une demande de clarification d'une question déjà posée, fournir le numéro de billet de la demande précédente : No	
Is your question pertaining to instructions found in a PDI? If so, provide the PDI URL for reference / Si la question porte sur des instructions données dans des IEP, fournir l'adresse URL des IEP à titre de référence :	
Urgent Request/Demande urgente : ☐	Reason for Urgent Request/Raison pour laquelle la demande est urgente : Provide details (ie. Presentation; Litigation etc)/Fournir des détails (c.-à-d. présentation, litige, etc.)
Question An applicant is claiming 50 CRS points for a certificate of qualification for NOC 22311 for completing The Fire Alarm Technician Program with the CFAA. The Ministerial Instructions requires, "a certificate of qualification in a trade occupation issued by a competent provincial or federal authority". From my understating the CFAA is not a competent provincial or federal authority, and it appears that what the applicant has provided is a certification of completion of the program. I would like guidance as to whether or not the applicants completion of The Fire Alarm Technician Program with the CFAA, making him a registered technician with the CFAA is a valid certificate of qualification making them eligible to received the 50 CRS points.	
Supervisor / Superviseur : Katya Mikhaylichenko <Ekaterina.Mikhaylichenko@cic.gc.ca	

Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
Information disclosed under the Access to Information Act
L'information divulguée en vertu de la loi sur l'accès à l'information

Date : 15/10/2025

B- To be completed by EFSI advisors/à remplir par les conseillers de l'IEFS.

When complete send to / Un fois rempli, l'envoyer à : IRCC.EFSIFunctionalGuidance-OrientationFonctionnelleIEFS.IRCC@cic.gc.ca

Tracking #/N° de suivi : FG-2025-0210		
Division : Skilled Workers and Business Program Guidance	Unit /Unité : Express Entry	Advisor / Conseiller(ère) : Talia Santilli
Answer approved by / Réponse approuvée par : Elizabeth Kaminsky		
Consulted/Personnes consultées : Elizabeth Kaminsky, Jenna McMahon		

Answer/Réponse

The Canadian Fire Alarm Association (CFAA) is a not-for-profit, industry-supported organization that administers a provincially-recognized certification program for fire alarm technicians. While CFAA is not explicitly named in Ontario legislation, its certification is recognized in practice by the Office of the Fire Marshal (OFM) as the standard credential for those performing inspection, testing, and maintenance of fire alarm systems in Ontario.

The OFM provides leadership and expertise on fire safety in Ontario and is responsible for administering the *Fire Protection and Prevention Act, 1997* (FPPA), the Ontario Fire Code (O. Reg. 213/07), and other regulations made under the act that govern fire safety matters such as, firefighter certification, community risk assessments, mandatory inspections and fire drills in vulnerable occupancies. The Fire Marshal is the principal adviser to Ontario government on public fire protection policy and fire safety issues. Both the Fire Marshal and Deputy Fire Marshal are statutory positions, appointed by the Lieutenant Governor in Council. The powers and duties of the Fire Marshal are laid out in Part III of the Fire Protection and Prevention Act, 1997.

Under Section 1.2.1.2. (1) of the Ontario Fire Code, individuals performing work on fire alarm systems must have completed a program or course acceptable to the Fire Marshal. In practice, this has been interpreted by the OFM to mean certification through the CFAA. As such, CFAA-certified technicians are considered "qualified persons" under the Code, and their credentials are accepted as meeting the regulatory requirements for fire alarm system maintenance.

Given the recognition of the CFAA by the Office of the Fire Marshal, and its demonstrated capacity to regulate certification in the fire alarm technician trade under the authority of provincial legislation and regulation, **for the purposes of assigning CRS points.**

This applicant appears to be a "Fire Alarm Technician", a role focused on the inspection and maintenance of fire alarm systems. In contrast, the Sprinkler and Fire Protection Installer is a regulated trade under Skilled Trades Ontario, focused on the installation of fire suppression systems (the water coming out of the

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sprinkler). While that trade requires a formal apprenticeship and provincial "Certificate of Qualification", We recognize that "certificates of qualification" can be complex to assess, particularly when issued by non-governmental organizations. If there is any uncertainty about whether a certificate meets the criteria for a "certificate of qualification", please consult with the functional guidance team. These cases help inform future policy development and guidance.

Status/État :	Closed/Fermé ☑	Instructions to be updated/Instructions à mettre à jour ☐

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s.16(2)(c)

Request to Economic Programs Sector – Functional Guidance Form
Formulaire de demande d'orientation fonctionnelle – Demande au secteur des programmes économiques i

A- To be completed by the requester/À remplir par l'auteur de la demande.

When complete send to / Une fois rempli, l'envoyer à :
IRCC.EPFunctionalGuidance-OrientationFonctionnellePE.IRCC@cic.gc.ca

Urgent Request / Demande urgente : ☐	Reason for urgency / Raison de l'urgence:	Provide details (ie. Presentation; Litigation etc)/Fournir des détails (c.-à-d. présentation, litige, etc.)

Office / Bureau :	Edmonton IRCC
Branch / Direction générale :	IOB
Division/Unit / Division/Unité :	EIOD
Category / Catégorie :	Permanent Resident/ Résidents permanents
Context / Contexte :	Certificate of Qualification
Class or program name / Catégorie ou nom de programme :	Canadian Experience Class
Previous ticket number (if applicable) / numéro de billet précédente (s'il y a lieu) :	
Background / Recherche préliminaire :	Express Entry Assessing A11.2 PDI and online research specific to Exterminator Licenses in Ontario
Relevent PDI links / Liens PDI pretinents :	Express Entry: Assessing an electronic application on section A11.2

Question :

I am looking for guidance regarding Certificates of Qualification. We are seeing an increased volume of these from applicants claiming 50 points for a Certificate of Qualification under the CEC stream. I have 2 files both claiming points for an Exterminator License. I note that both files have used the same Immigration Representative. It appears that the client takes a 1 day (or less) online course, writes an exam, receives the Certficate and then applies for and receives a 5 year Licence from the Province of Ontario. It appears that all requirements are met to receive the 50 points. My concerns are that the client has not and is not working in that profession, and likely do not intend to. Rather it is a quick way for the applicant to receive 50 points.

As the client appears to meet the requirements, and I do not have an Act, Regulation or Ministerial Instruction to refuse this on, my concerns include undermining the intent and integrity of the Certificate and of the program.

I am seeking information on how to refuse these Certificates if possible. Thank you.

Supervisor / Superviseur :	Kelsey Proden (for Ingrid Vargas)

*__Please note that we do not answer case specific enquiries.__ Please contact MIOB CCMD Immigration Case Advice for case specific enquiries.

Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
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***Veuillez noter que nous ne répondons pas aux demandes spécifiques**. Veuillez contacter Conseil Cas Immigration DGIO DRCC pour des demandes spécifiques au cas.

Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
Information disclosed under the Access to Information Act
L'information divulguée en vertu de la loi sur l'accès à l'information

B- To be completed by advisors/à remplir par les conseillers.

When complete send to / Un fois rempli, l'envoyer à :
IRCC.EPFunctionalGuidance-OrientationFonctionnellePE.IRCC@cic.gc.ca

Division : Skilled Workers	Unit /Unité : Express Entry	Advisor / Conseiller(ère) : Talia Santilli
Answer approved by / Réponse approuvée par :	Marie Geralde Georges	
Consulted / Personnes consultées :		

Answer / Réponse :

Thank you for reporting this trend. This is helpful in the context of program and policy enhacements for Express Entry.

I appreciate your concerns with the ease of acquisition of this document. However, the Ministerial Instructions respecting the Express Entry system - current - Canada.ca only requires that the applicant possesses a "certificate of qualification in a trade occupation issued by a competent provincial or federal authority." It is only the Federal Skilled Trades (FST) class that requires that, "…they hold a certificate of qualification issued by a competent provincial or federal authority in the skilled trade occupation specified in the application for a permanent resident visa…" per Section R87.2(3)(d)(i) of the Immigration and Refugee Protection Regulations.

That said, in order to qualify for Comprehensive Ranking System (CRS) points, the document must be authentic and issued to the applicant

As always, ensure your decision aligns with Decision making: Standard of review and process for making a reasonable decision and Procedural fairness.

Status/État :	Closed/Fermé ☒	Instructions to be updated/Instructions à mettre à jour ☐

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Request to IPG - Functional Guidance Form

Formulaire de demande d'orientation fonctionnelle – Demande à l'OPI[i]

Date : Select date/Choisir la date

A- To be completed by the requester/À remplir par l'auteur de la demande.

When complete send to / Une fois rempli, l'envoyer à : IRCC.IPGFunctionalGuidance-OrientationFonctionnelleOPI.IRCC@cic.gc.ca

Office / Bureau : CPCO	Email address/Adresse de courriel : Anna.Prikhodko@cic.gc.ca
Branch / Direction générale : CN	Division/Unit / Division/Unité:
Category / Catégorie : Permanent Resident/ Résidents permanents	
Context/Contexte : Is certificate of completion from certain driving schools AZ/DZ group #73 eligible to 50 points	
Class or program name / Catégorie ou nom de programme : CEC	
Background /Recherche préliminaire:	
Is this a request for clarification from a previous question, if so please provide the ticket number of the previous request / S'il s'agit d'une demande de clarification d'une question déjà posée, fournir le numéro de billet de la demande précédente :	
Is your question pertaining to instructions found in a PDI? If so, provide the PDI URL for reference / Si la question porte sur des instructions données dans des IEP, fournir l'adresse URL des IEP à titre de référence :	
Urgent Request/Demande urgente : ☐	Reason for Urgent Request/Raison pour laquelle la demande est urgente : Provide details (ie. Presentation; Litigation etc)/Fournir des détails (c.-à-d. présentation, litige, etc.)

Question

Some applicants have been claiming the extra(50) points usually awarded to holders of certain "certificates of qualification" issued by the provinces. Clients provide the private driving school issued "certificates of completion" of an AZ/DZ driving licence in lieu of a provincially awarded "certificate of qualification" in an attempt to claim those extra points.

Seeing as we have a large number of new agents, could you possibly provide some guidance regarding accepted, if any, "certificates of qualification" related to heavy transport operators(AZ/DZ licenced operators) to help clarify the situation?

Supervisor / Superviseur : Kwen Fong

Date : 01/03/2024

B- To be completed by IPG advisors/à remplir par les conseillers de l'OPI.

When complete send to / Un fois rempli, l'envoyer à : IRCC.IPGFunctionalGuidance-OrientationFonctionnelleOPI.IRCC@cic.gc.ca

Tracking #/N° de suivi : IM-2024-0053		
Division : Permanent Resident Status, Pilots	Unit /Unité : Express Entry Team	Advisor / Conseiller(ère) : Talia Santilli

Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
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and Economic Programs Division (SPEC)		
Answer approved by / Réponse approuvée par : Marie Geralde Georges		
Consulted/Personnes consultées : Jennifer Muchmore, Permanent Economic Immigration Branch (PEIB)		

Answer/Réponse

With regards to documentation provided for the National Occupational Classification (NOC) **73300 – Transport truck drivers (and all other example titles)** listed in the NOC 73300 profile:

In the event the documentation provided was issued in the **Province of Ontario**, officers may include the following in their refusal letter (if refusal is rendered). Please tailor the refusal letter to suit the situation and reference the appropriate sections of the MIs.

> "Tractor-Trailer Commercial Driver does not have a certifying exam in this trade, and Skills Trade Ontario does not issue a Certificate of Qualification as defined in Section 26(1) of the Ministerial Instructions respecting the Express Entry system.
>
> Please see: Tractor-Trailer Commercial Driver - Skilled Trades Ontario"

This means that the drivers license they hold to operate a truck and the Mandatory entry-level training required in Ontario for trucking is not eligible for Comprehensive Ranking System (CRS) points as it is not a "certificate of qualification" as defined in Section 26(1) of the MIs for EE.

We are working on updated Program Delivery Instructions (PDI) on the topic of what is a certificate of qualification. We can confirm however, that in Ontario, a "certificate of qualification", as defined in Section 26(1) of the MIs for EE, for truck driving, does not exist therefore points cannot be awarded.

In the event that the documentation provided comes from another Province or Territory, please review the individual body that governs trades for that jurisdiction to see if such a certificate does exist. If unsure, please ask IPG as a Functional Guidance request.

Status/État :	Closed/Fermé ☑	Instructions to be updated/Instructions à mettre à jour ☑

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