

Audit of the Newfoundland and Labrador Provincial Nominee Program

Final Report

January 26, 2026



Publication History

Version	Date	Description
DRAFT v1	December 16, 2025	Draft for review by the Project Authority
DRAFT v2	December 23, 2025	Draft with Project Authority feedback integrated
DRAFT v3	January 9, 2026	Draft with Project Authority feedback integrated
FINAL	January 26, 2026	Final for the Project Authority's approval

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TABLE OF CONTENTS

LIST OF ABBREVIATIONS AND ACRONYMS	4
EXECUTIVE SUMMARY	5
Introduction	5
Audit Objective and Scope	5
Strengths	5
Areas for Improvement.....	6
1 BACKGROUND	9
1.1 General	9
1.2 NLPNP Categories	9
1.3 Literature Review Findings	10
2 INTRODUCTION.....	13
2.1 Audit Objective.....	13
2.2 Audit Scope	13
2.3 Statement of Assurance	13
2.4 Approach and Methodology	13
3 OBSERVATIONS	15
Finding 1: Program criteria and associated policies and procedures are defined and transparently communicated to applicants. However, there is an opportunity to formalize the process to update and communicate policies and procedures to support improved consistency of policy interpretation and application.	15
Finding 2: Program efficiency and oversight have improved since transitioning to the new portal. However, there is an opportunity to review the assessment process to ensure compliance with documented policies and procedures and improve consistency of assessments.	17
Finding 3: There is an opportunity to formalize the program integrity framework to ensure the proactive identification of fraud and/or misrepresentation.	18
Finding 4: Roles and responsibilities for program oversight, implementation, and compliance are defined and operational.	20
Finding 5: While monitoring and reporting mechanisms are in place, there is an opportunity to enhance the quality and scope of data to better support informed decision-making and ensure effective monitoring of CNLIA requirements.....	21
Finding 6: The jurisdictional scan highlights best practices and lessons learned from comparable provincial nominee programs to inform potential opportunities for continued enhancement of the NLPNP.....	22
4 CONCLUSION	24



APPENDIX A	AUDIT PROGRAM	25
APPENDIX B	TESTED KEY CONTROLS	26
APPENDIX C	AUDIT CONTROL ASSESSMENT	27
APPENDIX D	RECOMMENDATION AND MANAGEMENT ACTION PLAN PRIORITY SCALE.....	28

LIST OF ABBREVIATIONS AND ACRONYMS

Abbreviation/Acronym	Definition
CNLIA	Canada-Newfoundland and Labrador Immigration Agreement
EOI	Expression of Interest
FSWP	Federal Skilled Worker Program
GoC	Government of Canada
IPDO	Immigration Program Development Officer
IRCC	Department of Immigration, Refugees and Citizenship Canada
IRPA	Immigration and Refugee Protection Act
JGRD	Department of Jobs, Growth and Rural Development
MPNP	Manitoba Provincial Nominee Program
NL	Newfoundland and Labrador
NLPNP	Newfoundland and Labrador Provincial Nominee Program
NOC	National Occupational Classification
OIM	Office of Immigration and Multiculturalism
PNP	Provincial Nominee Program
PF	Procedural fairness
RACI	Responsible, Accountable, Consulted, and Informed
RCMP	Royal Canadian Mounted Police
The Province	The Province of Newfoundland and Labrador
QA	Quality Assurance

EXECUTIVE SUMMARY

Introduction

The Newfoundland and Labrador Provincial Nominee Program (NLPNP) is an immigration program that is administered by the province of Newfoundland and Labrador (the province). It operates under the Canada-Newfoundland and Labrador Immigration Agreement (CNLIA) with the federal Department of Immigration, Refugees and Citizenship Canada (IRCC). It allows the province to nominate applicants to the federal government for permanent residency under these categories: Skilled Worker, Express Entry Skilled Worker, International Graduate, International Entrepreneur, and International Graduate Entrepreneur.

The goal of the NLPNP is to help the province address its labour market needs via immigration from other countries. If an individual meets the criteria and eligibility requirements for one of the categories, the province will support that individual's application for permanent residency to IRCC. Provincial nominees must settle in Newfoundland and Labrador and have sufficient ability to communicate in either English or French. Depending upon the program category in which an application is submitted, specific financial and other criteria will apply.

The primary objective of the NLPNP, as outlined in Annex "A" (Provincial Nominees) to the CNLIA is:

"To strengthen Newfoundland and Labrador's ability to enhance the economic benefits of immigration to the province, taking into account Newfoundland and Labrador's economic priorities as well as the development of Minority Official Languages Communities in the province."

Audit Objective and Scope

The objective of the audit was to assess the adequacy of governance, oversight, compliance, and program integrity mechanisms of the NLPNP.

As defined in the CNLIA, the Government and Newfoundland and Labrador is required to conduct an independent and objective audit of the NLPNP once every five-year cycle. This audit satisfies that requirement.

The audit covered the period beginning immediately after the conclusion of the previous audit conducted in 2018. The scope included the following assessments:

- 1) Whether the criteria and processes for nominating qualified applicants have been established, are consistent with applicable requirements, and are publicly available;
- 2) Whether applicant nominations are in accordance with established criteria by the program and the federal government, including the CNLIA; and,
- 3) Whether there is an established oversight mechanism in place to monitor the implementation of all policies and procedures, report on program outcomes and information on fraud and misrepresentations that is shared and acted upon.

Strengths

During the audit, strengths were identified and include the following:

- Program criteria and associated policies and procedures are well-defined and transparently communicated to applicants through publicly available resources.
- Internal training manuals and resources for Immigration Program Development Officers (IPDOs) provide detailed guidance on program categories, eligibility criteria, and application processing procedures.

- The transition to the Immigration Accelerator portal in May 2024 has improved operational efficiency and user experience, thereby reducing manual data input and simplifying processes for applicants and staff.
- Governance and accountability mechanisms, including the Responsible, Accountable, Consulted, and Informed (RACI) chart and escalation paths, are clearly defined and operational.
- Regular bilateral meetings with IRCC ensure alignment with federal objectives and compliance with the CNLIA.
- Existing monitoring mechanisms are effective in tracking operational metrics, such as application volumes and processing times.

Areas for Improvement

While positive observations were made, the following areas were noted as requiring further improvement:

- While policies and procedures are generally well-documented, updates to these policies are not always made in a consistent or structured manner. This can occasionally lead to ambiguity in policy interpretation and application by staff.
- The assessment process is functioning effectively overall, but there are some opportunities to enhance consistency in how procedures are applied. For example, there are occasional gaps in documenting internal communications and marking documents as "accepted".
- Rejected applications could also benefit from more consistent documentation of procedural fairness processes, such as management meeting notes and approvals.
- There is an opportunity to strengthen fraud prevention and detection measures. Currently, formal training for staff on fraud prevention is limited, and there is no dedicated program integrity unit to proactively identify trends or gaps.
- Post-nomination outcomes, such as conversion¹ and retention rates, are not systematically tracked due to limited access to federal data, which could provide valuable insights into program performance.

¹ Conversion rate refers to how effectively candidates move from one immigration pathway to the next, most commonly from provincial nomination to permanent residence.



The following recommendations and opportunities for improvement have been made to address the areas of improvement noted above.²

Recommendation	Priority	Management Response
<p>Recommendation 1: Implement a formalized policy update framework with defined ownership, regular review cycles, and event- or performance-based triggers (e.g., legislative changes, audit findings, or performance deviations) to ensure timely updates, supported by targeted training and communication for consistent application across staff.</p>	Medium	<p>Management Response: Owner: Target Completion Date:</p>
<p>Recommendation 2: Review and enhance the execution of the IPDO due diligence process to establish more robust controls and consistent assessment procedures in the new portal. Ensure that any updates made to the process and controls are reflected in relevant guidance and training materials to promote alignment and effective implementation.</p>	High	<p>Management Response: Owner: Target Completion Date:</p>
<p>Recommendation 3: Enhance the program integrity framework by leveraging the expertise of the program integrity team lead to identify reliable fraud indicators, implement regular monitoring and reporting mechanisms to support management oversight, and formalize recurring staff training on fraud prevention and detection. Periodically assess workload, risk exposure, and program growth to determine whether and when to formalize a dedicated program integrity unit.</p>	Medium	<p>Management Response: Owner: Target Completion Date:</p>
<p>Opportunity for Improvement 1: Consider expanding monitoring efforts by identifying and tracking additional data points from the Immigration Accelerator to enhance understanding of program performance and ensure consistent application of program criteria.</p>	Low	<p>Management Response: Owner: Target Completion Date:</p>
<p>Opportunity for Improvement 2: Consider collaborating with federal authorities to</p>	Low	<p>Management Response:</p>

² **Recommendation:** A recommendation is a formal, action-oriented suggestion provided by the internal audit team to address a specific audit finding. It is intended to correct a control deficiency, mitigate a risk, or improve operational effectiveness. Recommendations are based on observed conditions and root causes, and they require management to respond with an action plan and timeline for implementation. Recommendations are tracked for follow-up in subsequent audit cycles.

Opportunity for Improvement: An opportunity for improvement is an advisory observation that highlights a potential enhancement to existing processes, controls, or practices. It does not indicate a non-compliance or critical deficiency but suggests a way to improve efficiency, strengthen controls, or align with industry best practices. Management may choose to act on an Opportunity for Improvement at their discretion, and formal follow-up is not required unless the suggestion is accepted and implemented.

Recommendation	Priority	Management Response
improve data-sharing agreements and processes to support monitoring of post-nomination outcomes. Interim measures, such as targeted surveys, could also further supplement these efforts.		Owner: Target Completion Date:

1 BACKGROUND

1.1 General

The Newfoundland and Labrador Provincial Nominee Program (NLPNP) is an immigration program that is administered by the province of Newfoundland and Labrador (the province). It operates under the Canada-Newfoundland and Labrador Immigration Agreement (CNLIA) with the federal Department of Immigration, Refugees and Citizenship Canada (IRCC). It allows the province to nominate applicants to the federal government for permanent residency under these categories: Skilled Worker, Express Entry Skilled Worker, International Graduate, International Entrepreneur, and International Graduate Entrepreneur.

The goal of the NLPNP is to help the province address its labour market needs via immigration from other countries. If an individual meets the criteria and eligibility requirements for one of the categories, the province will support that individual's application for permanent residency to IRCC. Provincial nominees must settle in Newfoundland and Labrador and have sufficient ability to communicate in either English or French. Depending upon the program category in which an application is submitted, specific financial and other criteria will apply.

The primary objective of the NLPNP, as outlined in Annex "A" (Provincial Nominees) to the CNLIA is:

"To strengthen Newfoundland and Labrador's ability to enhance the economic benefits of immigration to the province, taking into account Newfoundland and Labrador's economic priorities as well as the development of Minority Official Languages Communities in the province."

The NLPNP transitioned from its previous portal system (used from 2017 to 2024) to a new portal, the Immigration Accelerator, in May 2024. The Immigration Accelerator provides a more user-friendly interface for applicants and offers enhanced functionality for tracking metrics. It also includes improved tracking for third-party representatives, such as consultants or employers completing applications on behalf of applicants. The old portal has not been decommissioned and is used to store legacy data. Any new applicant data is housed and assessed on the Immigration Accelerator.

1.2 NLPNP Categories

The NLPNP includes the following categories and minimum criteria (non-exhaustive):

1. Skilled Worker - for individuals who have a full-time job or job offer from a valid Newfoundland and Labrador employer;
2. Express Entry Skilled Worker - for individuals who have been accepted into IRCC's Express Entry pool and have a full-time job or job offer from a valid Newfoundland and Labrador employer;
3. International Graduate - for individuals who have an IRCC post-graduation work permit (PGWP) and a full-time job or job offer from a valid Newfoundland and Labrador employer that is related to their field of study;
4. International Entrepreneur - for experienced business owners or senior business managers who wish to start or acquire a business in Newfoundland and Labrador and who intend to provide active and ongoing participation in the day-to-day management and direction of a business;
5. International Graduate Entrepreneur - for individuals who have graduated from Memorial University of Newfoundland or College of the North Atlantic after at least two (2) years of full-time study; and have started or acquired a business in Newfoundland and Labrador, including actively operating and managing it for at least one (1) year.

1.3 Literature Review Findings

A literature review was conducted on Provincial Nominee Programs in Canada to support the contextual understanding of the environment in which the NLPNP operates as well as to highlight any relevant leading practices in nominee program design, delivery, and oversight. As a best practice, BDO recommends that NLPNP continue to review the research and best practices from the literature review and jurisdictional scan to inform future decision-making and management actions.

Nationally, Provincial Nominee Programs have expanded significantly and now represent a major component of Canada's economic immigration system. In 2019, these programs accounted for approximately one third of all economic immigrants³, compared to about one per cent in 2000.⁴ This evolution has shifted immigration patterns across Canada and increased expectations for program integrity, service quality, and measurable economic outcomes.

The literature highlighted changing nominee characteristics. Nominee principal applicants are now generally younger, more highly educated, and more likely to have prior Canadian work or study experience than earlier cohorts.⁵ For example, 61% of Provincial Nominee Program (PNP) immigrants in 2019 had prior Canadian work earnings, up from just 6% in 2002. Similarly, 38% had Canadian study experience before immigrating, compared to 7% in 2010.⁶ These factors have contributed to stronger short-term employment outcomes and higher retention in the nominating province.

Public sector service standards form another important reference point. Several provinces publish service commitments related to processing times, communication, and transparency. For example, British Columbia (BC) reported in 2024 that there would be an increase in processing times for Skills Immigration applications from the standard processing time of three months.⁷ BC also publishes an annual Statistical Report and Year in Review that provides detailed public reporting on nomination volumes, processing outcomes, sector-targeted priorities, regional distribution, wages, and program integrity activities.⁸ These practices help to maintain fairness and applicant confidence, and provide a basis for considering NLPNP's own service expectations, communication practices, transparency, and outcome reporting.

The literature also identified several leading practices in program integrity and governance. Saskatchewan implemented a legislated integrity framework that includes administrative penalties, new eligibility requirements for recruiters/employers, and a dedicated compliance branch with investigative authority.⁹ British Columbia has adopted proactive integrity and transparency mechanisms, including publication of annual statistical reports on its provincial nominee program, data on nominations, application volumes, processing times, program outcomes, and integrity activities. The 2024 reporting confirms the operation of a dedicated Anti-Fraud and Investigations Unit, which conducted over 2,000 case reviews by the end of 2024.¹⁰ Ontario has introduced administrative and operational updates to its provincial nominee program intended to improve oversight and responsiveness, including enhanced authority to request in-person interviews where integrity concerns

³ Picot, G., et al. (2023, July 26). *The Provincial Nominee Program: Its expansion in Canada*. Statistics Canada. <https://www150.statcan.gc.ca/n1/pub/36-28-0001/2023007/article/00004-eng.htm>

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Government of British Columbia. (2024). BC Provincial Nominee Program: Archived news items 2024. <https://www.welcomebc.ca/immigrate-to-b-c/about-the-bc-provincial-nominee-program/archives#News>

⁸ Government of British Columbia. (2024). BC Provincial Nominee Program: Statistical Report and Year in Review 2024 [PDF]. <https://www.welcomebc.ca/immigrate-to-b-c/about-the-bc-provincial-nominee-program/archives>

⁹ Government of Saskatchewan. (2024, September 3). *Saskatchewan establishes the strongest immigration program integrity framework in Canada as new regulations come into effect*. <https://www.saskatchewan.ca/government/news-and-media/2024/september/03/saskatchewan-establishes-the-strongest-immigration-program-integrity-framework-in-canada-as-new-regu>

¹⁰ Government of British Columbia. (2024). BC Provincial Nominee Program: Statistical Report and Year in Review 2024 [PDF]. <https://www.welcomebc.ca/immigrate-to-b-c/about-the-bc-provincial-nominee-program/archives>

arise.^{11 12} Manitoba emphasizes stakeholder engagement and aligns program delivery closely with settlement supports to improve newcomer outcomes.¹³ These examples illustrate governance and oversight mechanisms that contribute to consistency, fraud prevention and program accountability, and therefore offer relevant benchmarks when considering NLPNP's control environment.

The literature further noted emerging developments that may influence nominee program administration. Several provinces have increasingly relied on digital platforms to manage application intake, processing, and reporting for provincial nominee program.^{14 15} Another development is the rise of sector-targeted nomination streams in areas such as technology, health care and construction.¹⁶ Together, these trends underscore the need for program adaptability and forward-looking risk management.

Finally, the literature identified several methodologies commonly used to evaluate nominee program performance and integrity. These include risk-based assessment frameworks that use indicators such as low salaries, high-risk occupations, or patterns linked to specific employers or representatives to triage applications, as seen in Ontario's adoption of a formal risk tool.¹⁷ Data-driven techniques are also used, including cross-checks with external databases, supported through federal-provincial program integrity, including information sharing and coordinated integrity activities.¹⁸ Verification of eligibility criteria remains a core practice, with provinces confirming language test results, validating job offers and, in some cases, requiring employer registration to ensure legitimacy.^{19 20 21 22 23} Post-nomination monitoring is also applied to assess outcomes such as employment, income and retention, with provinces like British Columbia and Manitoba publishing performance indicators to measure economic integration and longer-term program impact.^{24 25}

Overall, the literature demonstrates that Provincial Nominee Programs operate within an evolving landscape that places increasing emphasis on integrity, transparency, service quality and outcome measurement. The practices and trends identified across jurisdictions provide useful context for

¹¹ Ontario news release: *Ontario Introduces Seventh Working for Workers Act* – Government of Ontario <https://news.ontario.ca/en/release/1005965/ontario-introduces-seventh-working-for-workers-act>

¹² Immigration.ca: *Ontario Proposes To Boost Enforcement and Enhance Flexibility of OINP* <https://immigration.ca/ontario-proposes-to-boost-enforcement-and-enhance-flexibility-of-oinp>

¹³ Carter, T., Pandey, M., & Townsend, J. (2010). *The Manitoba Provincial Nominee Program* (IRPP Study No. 10). <https://irpp.org/wp-content/uploads/assets/research/diversity-immigration-and-integration/the-manitoba-provincial-nominee-program/IRPP-study-no10.pdf>

¹⁴ Ontario Ministry of Citizenship and Immigration. (2017). *Our foundation for tomorrow: Ontario's immigration strategy - 2017 progress report*. <https://www.ontario.ca/page/our-foundation-tomorrow-ontarios-immigration-strategy-2017-progress-report>

¹⁵ Government of British Columbia. (n.d.). *British Columbia Provincial Nominee Program - Skills Immigration Technical Guide*. <https://www.welcomebc.ca/immigrate-to-b-c/bc-pnp-si-technical-guide-pdf>

¹⁶ Government of British Columbia. (2023). *BC PNP statistical report and year in review 2023* [PDF]. <https://www.welcomebc.ca/immigrate-to-b-c/bc-pnp-statistical-report-2023-pdf>

¹⁷ Office of the Auditor General of Ontario. (2024). *Ontario Immigrant Nominee Program: Performance Audit (Annual Report 2024)*. https://www.auditor.on.ca/en/content/annualreports/audits/en2024/AR-PA_ONimmigrant_en24.html

¹⁸ Immigration, Refugees and Citizenship Canada. (2017). *Evaluation of the Provincial Nominee Program* (archived). <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/reports-statistics/evaluations/provincial-nominee-program-2015.html>

¹⁹ Ibid.

²⁰ Government of Manitoba. (n.d.). *Employer registration – Employment Standards*. https://www.gov.mb.ca/labour/standards/doc%2Cwrrpa-registration_info%2Cfactsheet.html

²¹ Government of Saskatchewan. (n.d.). *Employer FAQs – Recruit and hire workers with SINP*. <https://www.saskatchewan.ca/residents/moving-to-saskatchewan/hire-a-foreign-worker/recruit-and-hire-workers-with-sinp/employer-faqs>

²² Government of Saskatchewan. (n.d.). *Hiring workers for permanent jobs (SINP)*. <https://www.saskatchewan.ca/residents/moving-to-saskatchewan/hire-a-foreign-worker/recruit-and-hire-workers-with-sinp/hiring-workers-for-permanent-jobs>

²³ Office of the Auditor General of Ontario. (2024). *Ontario Immigrant Nominee Program: Performance Audit*. https://www.auditor.on.ca/en/content/annualreports/audits/en2024/AR-PA_ONimmigrant_en24.html

²⁴ Government of British Columbia. (2023). *BC PNP statistical report and year in review 2023* [PDF]. <https://www.welcomebc.ca/immigrate-to-b-c/bc-pnp-statistical-report-2023-pdf>

²⁵ *MPNP Annual Report 2023 – Manitoba Immigration* <https://immigratemanitoba.com/data/mpnp-annual-report-2023/>



understanding how nominee programs are expected to function and the types of controls and governance mechanisms that support effective program delivery.

2 INTRODUCTION

2.1 Audit Objective

The objective of the audit was to assess the adequacy of governance, oversight, compliance, and program integrity mechanisms of the NLPNP.

As defined in the CNLIA, the Government and Newfoundland and Labrador is required to conduct an independent and objective audit of the NLPNP once every five-year cycle. This audit satisfies that requirement.

The Audit Program, containing the audit criteria, that was used for this assignment, is presented in Appendix A. The audit criteria were developed based on the risk assessment performed during the Planning Phase of the audit.

2.2 Audit Scope

The audit covered the period beginning immediately after the conclusion of the previous audit conducted in 2018. The scope included the following assessments:

- 1) Whether the criteria and processes for nominating qualified applicants have been established, are consistent with applicable requirements, and are publicly available;
- 2) Whether applicant nominations are in accordance with established criteria by the program and the federal government, including the CNLIA; and,
- 3) Whether there is an established oversight mechanism in place to monitor the implementation of all policies and procedures, report on program outcomes and information on fraud and misrepresentations that is shared and acted upon.

2.3 Statement of Assurance

This assurance engagement was conducted according to the *Institute of Internal Auditors' Global Internal Audit Standards*.

In our professional judgment, sufficient and appropriate audit procedures have been conducted and evidence gathered to support the accuracy of the conclusion provided and contained in this report. The conclusion is based on a comparison of the conditions, as they existed at the time, against pre-established audit criteria. The conclusion is applicable only to the entities examined and within the scope described herein.

Responsible and Ethical Use of Artificial Intelligence

As part of ethical use of Artificial Intelligence (AI), every BDO employee is required to complete Ethical AI training. In conducting this engagement, BDO utilized an enterprise version of an AI tool solely to support the initial identification and scanning of publicly available literature related to other provincial nominee programs as part of the literature review process.

Following the initial scan, BDO applied additional procedures and professional analysis to develop and finalize the literature review content.

2.4 Approach and Methodology

BDO's approach to this audit included the following:

- Reviewed relevant media and literature about provincial nominee programs in Canada to gain a better understanding of the context in which the NLPNP operates.

- Reviewed relevant documentation, including, but not limited to: the CNLIA - General Provisions; CNLIA - Annex A: Provincial Nominees; previous internal audit report; and program policies and procedures. The purpose of documentation review was to gain an understanding of how current program processes, roles, and responsibilities are defined and communicated.
- Conducted interviews with key stakeholders, including: the Director of Immigration Operations, Manager of Immigration Programs, NLPNP Team Lead, Senior Policy Analysts, Immigration Program Development Officers, and a representative from IRCC. The purpose of interviews was to gain a deeper understanding of how policies, procedures, roles, and responsibilities were understood and implemented in practice; potential program risks; monitoring and reporting mechanisms; and any opportunities for improvement.
- Conducted testing procedures through the review and examination of a sample of finalized applications between 2018 and 2025 to confirm that assessments were clearly documented and aligned with program criteria, policies, and procedures. Additional walkthroughs and interviews were held with the NLPNP Team Lead as required to gain clarification on testing results. A summary of file testing results can be found in Appendix B.
 - To cover the audit scope period, a stratified sample of 10 files from the old portal was selected for testing. This included 9 approved files and 1 rejected file. For the new portal, a stratified sample of 25 files was selected for testing. This included 22 approved files and 3 rejected files (1 from each stream).²⁶
- Reviewed a selection of Provincial Nominee Programs in Canada to compare the NLPNP's policies, governance, and operational practices with similar jurisdictions and identify best practices or lessons learned. The jurisdictional scan was conducted using a two-pronged approach, consisting of a review of publicly available documentation and any relevant documents provided by the selected provinces, as well as interviews with a representative from each province's nominee program. The following provincial nominee programs were selected due to the similarities in their streams and geographic, demographic, and/or economic profiles to the NLPNP's: Manitoba, New Brunswick, Nova Scotia, and Saskatchewan.

The audit team documented all findings against the audit criteria using structured working papers. Based on the evidence collected during the audit, the audit team formally assessed the effectiveness of each practice described within the audit program using a four-point scale, which can be found in Appendix C. The results of the audit control assessment can also be found in Appendix C.

²⁶ Three (3) out of four (4) rejected files did not make it past screening and therefore were not subject to the procedural fairness process.

3 OBSERVATIONS

The following sections detail the audit's findings according to the criteria set out in the audit program. Strengths and weaknesses will be discussed in addition to any relevant recommendations for improvement.

Finding 1: Program criteria and associated policies and procedures are defined and transparently communicated to applicants. However, there is an opportunity to formalize the process to update and communicate policies and procedures to support improved consistency of policy interpretation and application.

Clear NLPNP policy and procedural documentation are essential to establish the requirements and processes for potential applicants, as well as expectations for NLPNP staff responsible for assessing, reviewing, and approving applicant files.

The CNLIA is the governing immigration agreement between the Government of Canada (GoC) and Government of Newfoundland and Labrador (NL), established in accordance with the Immigration and Refugee Protection Act (IRPA). It is a publicly available document hosted on the GoC website with General Provisions and an Annex (Annex A). Annex A of the Agreement focuses on the roles and responsibilities of the Government of NL Department of Jobs, Growth and Rural Development (JGRD) in administering the Provincial Nominee Program and clearly sets out the provisions for assessment and nomination. It describes the following as the sole responsibility and basis of NL in assessing and nominating candidates who demonstrate they: 1) will be of benefit to the economic development of NL; and 2) have the ability and intention to economically establish and permanently settle in NL. Additional provisions defined in the CNLIA include the requirement to develop objective and transparent criteria for assessing and nominating individuals, provide Canada confidential information regarding the criteria, policies, and procedures for each PNP stream, and ensure consistency with the IRPA, national immigration policies, and terms of the CNLIA and Annex A.

The Government of NL has many policies and procedures posted on its website to equip candidates with the necessary information and tools to support their application, as well as guide them towards the appropriate PNP streams. This includes general program information such as a program overview and common acronyms, stream-specific criteria and required documents, and general policies and procedures. The Office of Immigration and Multiculturalism (OIM) has also developed an internal PNP staff training manual which provides detailed guidance on program categories, eligibility criteria, application processing procedures, staff roles, privacy protocols, communication standards, and use of the Immigration Accelerator portal.

It is standard practice for Immigration Program Development Officers (IPDOs) to follow up with applicants where documentation uploaded does not satisfy the outlined requirements. The audit analyzed a sample of 35 finalized applications and found that follow-ups were required approximately 60% of the time, but only 50% of the time for files processed in the new portal. This could indicate that policies are clearer now than previously when the old system was used for processing, and that the process in the new system is simpler and more user-friendly for applicants. Additionally, the most common documents that required re-submission by applicants were employment information, financial information, and police certificates and criminal records. These are inherently complex documents and therefore do not necessarily suggest a lack of clarity or communication in policies and procedures.

NLPNP policy and procedural updates occur somewhat inconsistently, with certain changes being ad-hoc and others occurring periodically. Certain policy changes are triggered by trends, bottlenecks or red flags identified by IPDOs and/or the PNP Team Lead and escalated upwards through the Manager of

Immigration Programs, Director of Immigration Operations, and Program Integrity Lead before becoming official policy updates. PNP Manual updates are also implemented on an ad-hoc basis. Other policy and procedural updates that are less significant, such as edits to wording or to the Responsible, Accountable, Consulted, Informed (RACI) chart, typically occur annually. The Government of NL has a disclaimer on its website indicating that policies and procedures are subject to change without notice, implying that applicants are responsible for ensuring they are referencing the most recent policies and procedures. Meanwhile, internal communication of policy changes varies based on the content being updated. OIM maintains a shared drive of all policies and procedures that is frequently updated and communicates any minor changes to IPDOs via Microsoft Teams. More significant updates warrant an email to staff. OIM also conducts bi-weekly training on certain topics or changes to clarify expectations for IPDOs based on these updates; however, these sessions are not mandatory.

The audit noted that internal staff may be interpreting policies differently due to ambiguity in policy documentation. While IPDOs are encouraged to cite policies in decision-making, particularly when rejecting files, there were differing opinions from staff regarding the clarity of policies and therefore the ability to easily reference policies. This increases the risk of inconsistent application of policies, potentially leading to fairness concerns and exposing the Government of NL to judicial claims. There is an opportunity for OIM to continuously improve the documentation and communication of policies by formalizing a framework for updating policies and procedures, such as implementing a trigger mechanism for updates, ensuring policies include prescriptive language where possible, and mandating training to ensure all staff have a consistent understanding of how policies should be interpreted and applied. This will help the NLPNP to ensure it is developing and applying objective criteria, as per the provisions in the CNLIA, and allow IPDOs to operate more efficiently and effectively by eliminating any grey area in decision-making.

Recommendation ²⁷	Priority ²⁸	Management Response
<p>Recommendation 1: Implement a formalized policy update framework with defined ownership, regular review cycles, and event- or performance-based triggers (e.g., legislative changes, audit findings, or performance deviations) to ensure timely updates, supported by targeted training and communication for consistent application across staff.</p>	<p>Medium</p>	<p>Management Response: Owner: Target Completion Date:</p>

²⁷ A recommendation is a formal, action-oriented suggestion provided by the internal audit team to address a specific audit finding. It is intended to correct a control deficiency, mitigate a risk, or improve operational effectiveness. Recommendations are based on observed conditions and root causes, and they require management to respond with an action plan and timeline for implementation. Recommendations are tracked for follow-up in subsequent audit cycles.

²⁸ The scale used to assess the priority associated with recommendations noted as part of the audit can be found in Appendix D, to facilitate management’s action planning.

Finding 2: Program efficiency and oversight have improved since transitioning to the new portal. However, there is an opportunity to review the assessment process to ensure compliance with documented policies and procedures and improve consistency of assessments.

A compliant and well-functioning PNP identifies objective criteria for assessment and nomination, ensures consistency in assessments, and incorporates management controls and approvals to demonstrate appropriate oversight of the program.

The CNLIA identifies economic establishment and intention to reside as the two primary criteria that must be met for an applicant to be considered for nomination under the NLPNP. By nature, economic establishment and intention to reside decisions are discretionary due to the subjectivity of these criteria. Despite this inherent trait, specific policies for each criterion are posted on the Government of NL immigration website to further explain the required information that applicants must provide to satisfy these requirements and assist IPDOs in their assessments. To assess intention to reside, factors for IPDO consideration are outlined in Policy 12 and include previously submitted applications to NLPNP and substantive ties to other Canadian jurisdictions. Economic establishment is evaluated based on factors like living arrangements, employer support, and financial stability, as further described in Policy 13.

Training of new IPDOs involves a structured process that includes reviewing all relevant materials and resources, such as the PNP Manual and OIM policies, familiarizing officers with the categories of the NLPNP, and arranging shadowing opportunities with experienced IPDOs. The PNP Team Lead collaborates closely with IPDOs, providing guidance and support as they perform due diligence in processing files. As part of this process, the PNP Team Lead holds meetings with IPDOs to review complex cases and verify whether the eligibility criteria have been met. Continuous improvement initiatives are conducted on an ad-hoc basis and consist of senior leader and peer-based mentorship. IPDOs have the autonomy to use their own judgement when assessing files and are encouraged to remain consistent with their own processing; however, ensuring consistency across IPDOs is a challenge due to the inherent subjectivity of decision-making and the lack of a standardized decision-making framework or scoring system to assess intent to reside and economic establishment. Ongoing efforts are underway within the NLPNP to address this issue, including meetings between the PNP Team Lead and officers to develop a policy that introduces more consistent practices while maintaining flexibility.

The PNP Manual outlines procedures for IPDOs in assessing applications. Once screening has been completed, IPDOs are assigned a file and begin to conduct due diligence. This includes verifying that the required documentation has been uploaded in accordance with OIM policies and assessing intent to reside and economic establishment. IPDOs are expected to follow-up with applicants if documentation is missing or supplementary information is required. Once a decision is made, whether approved or rejected, the application goes through an approval process by the Management team. IPDOs are encouraged to document any discussions on applicant eligibility in the new portal, although this is not a defined procedure in the PNP Manual and is not mandatory. The new portal also offers added functionality that was not available in the old portal, such as marking approved documents as “accepted”; however, this is not considered a mandatory process and is not documented in the PNP Manual.

Testing of approved applications revealed effective assessment and oversight processes and controls. Manager approvals are consistently being requested and obtained by IPDOs when recommending a file for nomination in the new portal, with 100% (23/23) of recommended files receiving appropriate approval, demonstrating adherence to compliance and oversight controls. This is an improvement from the old system, where the audit could not verify management consultation was conducted for 10% (1/10) of the files reviewed. The audit also noted consistent issuance of nomination certificates. An analysis of the process to generate a nomination certificate indicated IPDOs completed this step in

every approved file in the old portal (9/9) and new portal (23/23). Additionally, interviews with staff noted the Immigration Accelerator has improved processing efficiency compared to the old portal, eliminating redundant manual data input for IPDOs in completing due diligence assessments and allowing for email and certificate generation to occur directly within the new portal.

Rejected applications go through a detailed procedural fairness (PF) process, as outlined in the PNP Manual. The manual states that after determining an applicant does not meet program eligibility criteria, the IPDO will request a meeting with the PNP Team Lead or Manager of Immigration Programs to review the application. If the reviewer agrees with the assessment, the IPDO will draft a PF letter and include details of the management meeting in the online portal activities. The PF letter must then be reviewed by the PNP Team Lead and approved by Management prior to issuance. Once issued, the IPDO adds a scheduled activity for 10 business days as a reminder of the deadline for responding to the PF letter. If the IPDO receives a response within 10 business days that satisfies the concerns noted in the PF letter, the assessment of the application will proceed. Otherwise, an official closure letter is drafted and issued after undergoing a similar oversight and approval process to the PF letter. Testing of one rejected file²⁹ in the new portal indicated that a PF letter was generated and approved by management. However, there was limited evidence of related management meeting notes for the review and approval of both the PF letter and the subsequent closure letter.

Overall, due diligence processes are operating efficiently and somewhat effectively, and oversight has improved with the transition to the new portal. However, the inconsistent execution of assessment procedures in accepted and rejected files creates gaps in audit trails and could undermine the defensibility of decisions in case of disputes, as well as compromise the integrity and reliability of assessments. It is recommended that OIM conduct a thorough review of the IPDO due diligence process, including updating procedures in the PNP Manual, to more clearly identify mandatory procedures for file processing in the new system, such as marking documents as “accepted” and documenting all internal and external communications in activities. Conducting such a review will allow the NLPNP to better leverage new portal controls and functionality to increase assessment consistency and standardize processing, ultimately improving program compliance.

Recommendation	Priority	Management Response
<p>Recommendation 2: Review and enhance the execution of the IPDO due diligence process to establish more robust controls and consistent assessment procedures in the new portal. Ensure that any updates made to the process and controls are reflected in relevant guidance and training materials to promote alignment and effective implementation.</p>	<p>High</p>	<p>Management Response: Owner: Target Completion Date:</p>

Finding 3: There is an opportunity to formalize the program integrity framework to ensure the proactive identification of fraud and/or misrepresentation.

The existence of a framework to detect, investigate, and respond to potential fraud and/or misrepresentation is essential to safeguard the integrity, fairness, and credibility of the NLPNP. This helps ensure that program decisions are based on accurate information and risks to program objectives and public trust are identified and addressed in a timely and consistent manner.

²⁹ The other 2 rejected files were deemed ineligible during the screening process and are not subject to the PF process.

Procedures for identifying and responding to misrepresentation are outlined in OIM General Policy 4 and may be invoked if reasonable grounds exist to suspect an applicant has misrepresented themselves in an application. Such investigations are generally conducted by IPDOs and may require collaboration of external agencies both at the governmental (municipal/provincial/federal) and non-governmental level (e.g., financial and educational institutions). Once an investigation is opened, the IPDO informs the PNP Team Lead about potential misrepresentation on the file, who then decides if the matter requires the Program Integrity Team Lead's involvement. Any investigation must be brought to the attention of the Manager of Immigration Programs and Director of Immigration Operations for further direction. If the investigation concludes grounds for misrepresentation exist, a PF letter is sent to the foreign national, their employer, and/or representative, outlining reasons why it is believed misrepresentation has occurred. The PF letter provides the applicant ten (10) business days to submit evidence that misrepresentation was not committed, during which time the applicant cannot request to withdraw their application.

OIM investigates instances of possible fraud and misrepresentation by monitoring trends through data analysis and verifications. Employer data collected during the Expression of Interest (EOI) process is cross-referenced with the Government of NL Companies and Deeds Online to ensure legitimacy. Red flags, such as suspicious Google reviews indicating employer misuse of the PNP for permanent residency purposes, are investigated. IRCC also conducts biweekly nomination verifications, flagging discrepancies like altered National Occupational Classification (NOC) codes or unauthorized changes to applications. While interviews noted misrepresentation by applicants is becoming more frequent, the number of verifications requested by IRCC have decreased with the introduction of the new portal, with approximately one verification every two weeks compared to five (5) to ten (10) per day previously under the old portal. Interviews noted this reduction is due to a tool that automates biweekly reporting into an Excel template, which has reduced manual errors. Broader trends related to fraud and misrepresentation are also discussed at a national-level anti-fraud working group amongst various provinces and territories.

Applicants, employers, and/or third-party representatives found complicit of fraud or misrepresentation may be barred from using any NL immigration programs for up to five (5) years. The Director of Immigration Operations will consider individual circumstances when determining the length of the ban and may opt to bar a repeat offender for a longer period. Employers and representatives may face further consequences such as suspension from future participation in immigration programs, being subject to penalties under federal legislation, or being reported to regulatory or licensing bodies. Despite these mechanisms, there is no way for OIM to verify that penalties on employers misusing programs are being enforced.

The audit identified the absence of formal training for NLPNP staff on preventing and detecting fraud or misrepresentation. Although the GoC has previously provided training on this subject, it is not conducted on a recurring or ongoing basis. Currently, the process remains informal, relying on opportunities for staff to learn from more experienced colleagues about identifying such cases. To begin to address these challenges, OIM onboarded a Program Integrity Team Lead to support the NLPNP in identifying trends across different applications. This role is also intended to assist in identifying gaps within current program integrity processes and control.

Although OIM has established procedures for identifying and responding to fraud and misrepresentation, the audit noted that the program integrity framework remains preliminary, increasing the risk of undetected fraud or misrepresentation. Recognizing that the program integrity team lead is new to the organization, there is an opportunity to review and enhance the program integrity framework once the program integrity role becomes more established. Enhancements could include identifying and monitoring reliable fraud indicators and formalizing staff training. Additionally, eventually establishing a dedicated program integrity unit, similar to those implemented in other provinces (as noted in the jurisdictional scan), could further enable the proactive identification of trends, gaps, and opportunities for improvement.

Recommendation	Priority	Management Response
<p>Recommendation 3: Enhance the program integrity framework by leveraging the expertise of the program integrity team lead to identify reliable fraud indicators, implement regular monitoring and reporting mechanisms to support management oversight, and formalize recurring staff training on fraud prevention and detection. Periodically assess workload, risk exposure, and program growth to determine whether and when to formalize a dedicated program integrity unit.</p>	<p>Medium</p>	<p>Management Response: Owner: Target Completion Date:</p>

Finding 4: Roles and responsibilities for program oversight, implementation, and compliance are defined and operational.

Clearly defined roles and responsibilities for program oversight, implementation, and compliance are fundamental to maintaining accountability, supporting effective governance, and ensuring adherence to applicable agreements and regulations.

The NLPNP has established governance and accountability mechanisms through documented roles, responsibilities, and escalation paths. The RACI chart, maintained by the OIM, defines roles and responsibilities across various immigration-related processes. It outlines who is responsible, accountable, consulted, and informed for a wide range of operational, policy, and program integrity activities, including application processing, site visits, nomination approvals, fraud investigations, and policy amendments. The RACI chart includes multiple organizational roles from frontline officers to executive leadership and includes immigration operations and program integrity functions. Interviews and document reviews indicate that the RACI chart is consistently communicated during IPDO onboarding and applied in practice by key stakeholders, reinforcing role clarity and accountability across the program.

The internal PNP staff training manual also provides comprehensive guidance on program administration, including eligibility criteria, application processing, privacy protocols, and escalation procedures. The manual includes step-by-step instructions for IPDOs, onboarding schedules, assessment procedures, nomination issuance, and post-nomination processes. Templates for exemption requests and documented approval paths were observed, reducing the risk of unauthorized decisions.

Policies such as Intent to Reside and Proof of Ability to Economically Establish define role-based responsibilities and escalation points. Interviews confirmed that these roles and responsibilities are well understood in practice, and this was further validated through system walkthroughs. For example, the audit’s testing results demonstrated that the escalation path from IPDO to the Manager of Immigration Programs for nomination recommendations was followed in all files reviewed, reinforcing strong adherence to established processes.

The RACI chart reviewed during the audit was dated November 2024, demonstrating that updates are being made and reflecting a commitment to maintaining current roles and responsibilities documentation. However, the audit identified an opportunity to formalize a process and establish a documented schedule for the periodic review and version control of key documents, such as the RACI chart and the training manual. Implementing a structured approach would align with good governance practices and professional audit standards, ensuring control frameworks remain relevant and effective. Addressing this opportunity would strengthen the clarity and accountability of roles and responsibilities for all aspects of the program, ensuring they remain well-defined, operational, and relevant over time.

Please refer to Recommendation 1 above for suggested enhancements to address gaps noted in this finding.

Finding 5: While monitoring and reporting mechanisms are in place, there is an opportunity to enhance the quality and scope of data to better support informed decision-making and ensure effective monitoring of CNLIA requirements.

Effective monitoring and reporting mechanisms within the NLPNP are critical to providing reliable, timely information for decision-making and ensuring compliance with the CNLIA. These practices support accountability, transparency and program integrity.

The NLPNP operates within a framework that requires meeting annual federal allocations while ensuring compliance with the CNLIA. The CNLIA, established between the Government of NL and the GoC, defines the roles and responsibilities of both parties under the IRPA. It grants the province authority to assess and nominate candidates who will contribute to economic development and demonstrate the ability and intention to economically establish and permanently settle in NL. Each year, the Government of NL receives immigration allocations under the NLPNP from IRCC. The 2025 allocation letter reflected a 50% reduction from previous years due to adjustments in Canada's overall Immigration Levels Plan. The program functions within the federally determined allocation, with an internal objective to meet that allocation by year-end. Achieving this target enables the province to respond to and process the maximum number of newcomers seeking permanent residence in NL with the intention of addressing the province's labour market needs. Program performance is measured by two key metrics: timely and efficient processing of applications to fulfill the annual allocation; and fair, supportive engagement with employers in their labour market efforts. Oversight of these objectives rests with the Director of Immigration Operations, who is responsible for ensuring that the NLPNP meets the federal allocation annually and that it responds to provincial labour market conditions.

To monitor progress internally, the NLPNP employs several mechanisms. The year-end OIM processing report provides a summary of immigration activities, including application volumes, nomination approvals, processing times, refusal rates, and settlement trends. Complementing this is the OIM processing dashboard, which tracks application stages, regional distributions, demographic data, and progress toward monthly and annual targets.

To support program oversight and federal coordination, NLPNP and IRCC program and policy representatives hold regular bilateral meetings. These meetings ensure alignment with federal objectives, confirm that allocations and pathways address critical labour market needs, and verify adherence to regulatory requirements and the CNLIA. Furthermore, if applicable, NL will present proposed immigration pathways during these meetings for approval prior to their implementation in the province.

While IRCC does not require formal reporting on program outcomes or compliance with the CNLIA, NLPNP provides operational transparency through several tools. The dashboards prepared by OIM offer real-time insights into processed applications, queue volumes, screening status, and occupational breakdowns. OIM dashboards and nomination spreadsheets are shared with the Government of NL Executive Team to support federal forecasting, and a biweekly nominations report is submitted to IRCC.

In 2024, the launch of the Immigration Accelerator portal marked an advancement, streamlining document management and improving application data tracking, allowing NLPNP to prepare more accurate data and reporting. Collectively, these tools, dashboards, and reports enhance visibility into processing times, application volumes, and progress toward federal targets. However, these mechanisms remain primarily operational, focusing on throughput and annual targets rather than measuring long-term outcomes or compliance with the broader objectives of the CNLIA.

The current monitoring and reporting mechanisms of the NLPNP demonstrate a solid foundation in tracking operational metrics and progress towards annual allocation targets. However, there are opportunities to enhance the effectiveness of these mechanisms by expanding beyond operational metrics. This could include analysis of areas such as exemption patterns, application of language requirements, and consistency in discretionary decision-making could provide deeper insights into program performance. This can contribute to improved transparency and ensure consistent application of program criteria.

Another area for improvement lies in the tracking of post-nomination outcomes. Currently, these are not systematically monitored within the program’s operational scope and are reliant on external datasets from the federal government that are often delayed and difficult to interpret. However, while tracking post-nomination outcomes such as conversion and retention rates would provide NL with a more holistic understanding of the program’s impact, the ability to access the necessary data from the federal government remains a challenge. There may be an opportunity for NL to enhance its information sharing agreement with the federal government and enhance its ability to track post-nomination outcomes, supporting broader evidence-based decision-making and program improvements.

Opportunity for Improvement ³⁰	Priority	Management Response
Opportunity for Improvement 1: Consider expanding monitoring efforts by identifying and tracking additional data points from the Immigration Accelerator to enhance understanding of program performance and ensure consistent application of program criteria.	Low	Management Response: Owner: Target Completion Date:
Opportunity for Improvement 2: Consider collaborating with federal authorities to improve data-sharing agreements and processes to support monitoring of post-nomination outcomes. Interim measures, such as targeted surveys, could also further supplement these efforts.	Low	Management Response: Owner: Target Completion Date:

Finding 6: The jurisdictional scan highlights best practices and lessons learned from comparable provincial nominee programs to inform potential opportunities for continued enhancement of the NLPNP.

The jurisdictional scan conducted as part of this audit provided valuable insights into the practices of comparable PNPs in Manitoba, New Brunswick, Nova Scotia, and Saskatchewan. The purpose of the scan was to identify best practices and lessons learned that could inform potential enhancements to the NLPNP. The findings demonstrate that the NLPNP has made progress in aligning its operations with national immigration policies and addressing provincial labour market needs. Recent initiatives, such as the implementation of the Immigration Accelerator Portal in 2024 and the EO system in 2025, reflect

³⁰ An opportunity for improvement is an advisory observation that highlights a potential enhancement to existing processes, controls, or practices. It does not indicate a non-compliance or critical deficiency but suggests a way to improve efficiency, strengthen controls, or align with industry best practices. Management may choose to act on an Opportunity for Improvement at their discretion, and formal follow-up is not required unless the suggestion is accepted and implemented.

the program's commitment to continuous improvement and its adaptability to changing immigration landscapes.

The scan highlighted that the NLPNP's EOI system has improved its ability to prioritize applicants based on labour market needs and priority occupations, such as healthcare. However, the system currently functions primarily as an intake filter rather than a comprehensive ranking mechanism. In comparison, jurisdictions such as Manitoba and New Brunswick have implemented points-based scoring systems and publish draw results, which have enhanced transparency and operational efficiency. Considering similar refinements could help the NLPNP further optimize its EOI system, improving its alignment with provincial priorities and providing greater clarity to applicants.

The NLPNP has also demonstrated a commitment to program integrity through measures such as EOI data verification and consultation with federal business registries. These efforts are important for maintaining compliance and mitigating risks of fraud and misrepresentation. The jurisdictional scan, however, identified opportunities to build on these efforts by establishing a dedicated program integrity unit, as seen in Nova Scotia and Saskatchewan. These jurisdictions have implemented compliance teams with investigative powers and sector-specific fraud tracking, which have proven effective in mitigating risks and ensuring program compliance.

The application of discretion in the NLPNP is guided by internal controls, including regular officer meetings and managerial oversight, to ensure consistency and fairness in decision-making. For example, the assessment of an applicant's intent to reside in Newfoundland and Labrador is a key discretionary criterion. The NLPNP evaluates this factor against several indicators, including minimum in-province employment requirements in certain circumstances, such as for applicants who previously resided in another province or territory. This can function as an objective proxy for settlement intent. Similarly, other jurisdictions, such as New Brunswick, have incorporated explicit minimum work and living requirements into their eligibility criteria for some of their PNP streams. This demonstrates that the NLPNP is generally aligned with other jurisdictions in this regard. There may be an opportunity to continue assessing and exploring the use and necessity of explicit, stream-specific work or residency requirements to further complement discretionary assessments of applicants' settlement intent in order to reduce subjectivity and enhance the objectivity and efficiency of decision-making processes.

As noted above in Finding 5, the Immigration Accelerator Portal has significantly improved the NLPNP's capabilities in tracking applications and reporting outcomes. However, challenges remain in accessing critical federal data, such as provincial conversion rates, which limits the program's ability to conduct comprehensive evaluations and make data-driven decisions. The scan highlighted Nova Scotia's use of Power BI dashboards as a best practice, enabling real-time monitoring of application volumes and processing times. Similarly, Power BI is used to generate the NLPNP weekly processing dashboards. Through continue to leverage this tool and further advocating for restored access to federal data, the NLPNP could further enhance its performance monitoring and decision-making capabilities.

Across Canada, PNPs have many similarities in how they design and implement intake, assessment, performance monitoring, and reporting functions, with some differences in streams offered, tools to guide assessment, application of criteria, and program integrity mechanisms. The jurisdictional scan highlights best practices and lessons learned from comparable jurisdictions that could inform further enhancements to the NLPNP. By considering these practices, the NLPNP has the opportunity to build on its successes, strengthen its operational frameworks, and ensure its continued alignment with provincial and national immigration priorities.

As a best practice, BDO recommends that NLPNP continue to review the research and best practices from the literature review and jurisdictional scan to inform future decision-making and management actions.

4 CONCLUSION

The audit concluded that the NLPNP has established mechanisms to support the governance, oversight, compliance, and program integrity of the NLPNP. The NLPNP has demonstrated clear strengths, including well-defined program criteria, enhanced operational efficiency through the Immigration Accelerator portal, and defined monitoring and reporting mechanisms. These achievements reflect the program's commitment to continuous improvement and strong governance.

While the program is functioning well, there are opportunities for continued improvement. Formalizing policy update processes, further standardizing assessment procedures, enhancing fraud prevention measures, and expanding monitoring to include long-term outcomes would strengthen the program's integrity and ensure even greater alignment with its objectives. By addressing these opportunities for improvement, the program can continue to enhance its effectiveness, transparency, and alignment with provincial and national priorities.

APPENDIX A AUDIT PROGRAM

Control Element	Audit Objectives	Audit Criteria
A. Program and Process Design, Compliance, and Integrity	To determine whether the program is designed and operating in a manner that ensures compliance with the Canada-Newfoundland and Labrador Immigration Agreement, and that its processes function effectively, efficiently, and with integrity.	<p>A.1: Program criteria and associated policies and procedures are defined and communicated, internally and externally.</p> <p>A.2: Applicant assessments are consistently performed in compliance with documented criteria, policies, and procedures, and are executed in a manner that promotes operational efficiency and effectiveness.</p> <p>A.3: A framework is in place to detect, investigate, and respond to potential fraud and/or misrepresentation, including protocols for escalation and intergovernmental communication.</p>
B. Program Oversight and Monitoring	To assess whether there are effective program oversight and monitoring mechanisms.	<p>B.1. Roles and responsibilities for program oversight, implementation, and compliance are clearly defined and operational.</p> <p>B.2. Mechanisms are in place to support effective monitoring and reporting of program outcomes to support decision-making and meet the requirements of the CNLIA.</p>

APPENDIX B TESTED KEY CONTROLS

File testing in the new and old portal assessed the following application assessment processes and controls for a sample of approved and rejected files. The following table summarizes the controls the audit team tested, as well as any deficiencies or gaps noted during testing.

Application Status	Control Description	Key Control	Gap or Opportunity for Improvement Noted?
Approved	Due diligence assessment is performed by IPDO, including completing PNP assessment form and confirming all documents are on file.	Yes	Yes - see recommendation #2
Approved	Application is recommended for approval by IPDO.	No	None noted.
Approved	Application is approved by Team Lead / Manager / Director.	Yes	None noted.
Approved	Nomination Certificate is generated and sent by IPDO.	Yes	None noted.
Rejected	Procedural Fairness Letter is drafted by IPDO.	Yes	None noted.
Rejected	Management meeting notes are uploaded to activities on the new portal by IPDO.	No	Yes - see recommendation #2
Rejected	Procedural Fairness Letter is approved by Manager / Director.	Yes	None noted.
Rejected	Scheduled activity for 10 business days is added by IPDO to mark deadline for applicant response to Procedural Fairness Letter. ³¹	No	None noted.

³¹ New portal control only.

APPENDIX C AUDIT CONTROL ASSESSMENT

Based on the evidence collected during our audit, we formally assessed the effectiveness of each practice described within the Audit Program using a four-point scale, provided below.

Scale	Definition
Not effective at all - 1	Significant management attention is needed to improve these practices.
Somewhat effective - 2	Some parts of this element are in place, but key deficiencies exist.
Mostly effective - 3	Most parts of this element are working as intended, but more work is needed in some areas.
Fully effective - 4	No action is required. Everything is working as intended.

Control Element	Audit Criteria	Control Assessment
Program and Process Design, Compliance, and Integrity	A.1: Program criteria and associated policies and procedures are defined and communicated, internally and externally.	3
	A.2: Applicant assessments are consistently performed in compliance with documented criteria, policies, and procedures, and are executed in a manner that promotes operational efficiency and effectiveness.	3
	A.3: A framework is in place to detect, investigate, and respond to potential fraud and/or misrepresentation, including protocols for escalation and intergovernmental communication.	3
Program Oversight and Monitoring	B.1. Roles and responsibilities for program oversight, implementation, and compliance are clearly defined and operational.	3
	B.2. Mechanisms are in place to support effective monitoring and reporting of program outcomes to support decision-making and meet the requirements of the CNLIA.	4

APPENDIX D RECOMMENDATION AND MANAGEMENT ACTION PLAN PRIORITY SCALE

The following scale has been used to assess the priority associated with recommendations noted as part of the audit to facilitate management's action planning.

Priority	Management Response
High	The risks identified have a high level of exposure and should be addressed in the immediate or short-term, as a result of significant deficiencies in control structures and systems or required financial adjustments that are material to the organization.
Medium	The risks identified have a medium level of exposure and should be addressed in a timely manner to ensure that they do not escalate or result in a higher level of exposure for the organization.
Low	The risks identified represent lower priority or minor process improvement observations, which should be addressed where practical to improve the overall efficiency and/or effectiveness of the operations of the organization.