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# The Causes and Consequences of Administrative Burdens in the Canadian Private Sponsorship of Refugees Program

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#### **ABSTRACT**

This article explores the administrative burdens that refugee sponsors experience in their interaction with the state in the context of the Canadian Private Sponsorship of Refugees Program. Drawing on primary and secondary qualitative data, we show that over four decades of program implementation, the sponsorship application process has become more complex, resource intensive, and time-consuming for sponsors, subverting otherwise positive sponsorship experiences. Our findings contribute to theoretical debates in administrative burdens research and indicate an acute need for administrative changes that would simplify the application process for sponsors, thus sustaining and nurturing the broad public interest in the program.

#### **KEYWORDS**

Refugee sponsorship; private sponsorship of refugees program; Canada; refugee sponsors; administrative burdens

#### Introduction

Refugee sponsorship programs allow groups of ordinary individuals to welcome and financially, practically, and emotionally support refugee newcomers (Bond & Kwadrans, 2019; Labman & Cameron, 2020). Largely based on the long-standing Canadian model of private refugee sponsorship, such programs have recently gained traction in different countries as an effective way to increase refugees' access to protection and simultaneously grow public support for refugees (Bond, 2021; UNHCR, 2022).

Most refugee sponsorship research to date has focused on settlement outcomes of sponsored newcomers (Ambrosini & von Wartensee, 2022; Hynie et al., 2019; Kaida et al., 2019; Soehl & Van Haren, 2023), characteristics and motivations of sponsors (Blain et al., 2020; Macklin et al., 2018), and interactions between sponsors and refugees (Kyriakides et al., 2019). In contrast, little is known about state-sponsor interactions in the context of refugee sponsorship programs. This is an important research gap. Before welcoming and supporting refugee newcomers, sponsors need to invest time, resources, and energy into obtaining information about the program, meeting governmental requirements, and preparing their sponsorship application. Sponsors' experience of this process, or in other words, the administrative burdens that sponsors encounter (Burden et al., 2012; Moynihan et al., 2015), may well have an impact on their willingness to (re-)engage in refugee sponsorship. Ultimately, just as in other governmental programs, administrative burdens can largely shape the effectiveness, success, or failure of refugee sponsorship (Herd & Moynihan, 2018).

As an initial step toward filling this research gap, we present a study on the administrative burdens that sponsors face in the context of the Canadian Private Sponsorship of Refugees Program (PSRP): the oldest and largest sponsorship program which has been emulated by a dozen countries

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in recent years (Global Refugee Sponsorship Initiative, 2022). Our analysis is both timely and pertinent. To the best of our knowledge, there has been no scholarly research on administrative burdens in the PSRP, apart from anecdotal evidence for onerous paperwork and procedures in the Province of Quebec, where the program is implemented in a distinct way from the rest of Canada (Parent-Chartier et al., 2022, p. 267). Over the years, civil society organizations, practitioners, and sponsors have been repeatedly highlighting the program's growing bureaucratic hurdles (Adelman & Alboim, 2014, p. 8; Canadian Council for Refugees, 2012; Denton, 2003, pp. 6–7). More recently, sponsoring organizations and individual sponsors have expressed concerns that the program has become difficult to navigate (Alboim, 2016; Alhmidi, 2021) and "overly clunky" (Moran, 2023). Understanding and addressing the risks that such developments may pose is imperative in light of the recent growth of private sponsorship in the country and the commitment of the Canadian Government to further increase the number of privately sponsored refugees over the next several years (Immigration Refugees & Citizenship Canada, 2022a). Moreover, providing insights into the administrative burdens in the PSRP and their eventual consequences can benefit policymakers and practitioners abroad who design and implement refugee sponsorship programs.

We focus on the causes and consequences of administrative burdens in the PSRP since the program's introduction in 1979. More specifically, we ask what administrative changes has the program undergone in terms of application process and requirements for sponsors, how have sponsors experienced these changes, and what have been the consequences of these changes for sponsors and the program in general? We conceptualize administrative burdens as the combination of learning, compliance, and psychological costs that program participants face in their interaction with the state (Moynihan et al., 2015). To answer the above questions, we rely on qualitative data from fifty-nine semi-structured interviews with refugee sponsors and practitioners, archival research, and the review of application forms, regulatory amendments, program evaluations, and recent media publications. Our findings show a significant increase in administrative burdens for sponsors, especially in the last few years of program implementation, which stems from onerous paperwork and growing sponsorship requirements in the context of lengthy processing times. Importantly, these burdens disproportionately harm recent immigrants/refugees who sponsor their displaced kin through the PSRP, while also demotivating ordinary Canadians who engage in the program out of compassion and commitment to social justice (Hyndman et al., 2021). Ultimately, we argue that under the growing pressure of administrative hurdles, the PSRP may be drifting away from one of its original objectives: to engage civil society in refugee resettlement.

Our findings contribute to both theoretical and practitioner discussions in public administration and refugee sponsorship. By focusing on the PSRP, we add a novel perspective to the administrative burden scholarship, which is based primarily on analyses of bureaucratic hassles in welfare programs (Halling & Bækgaard, 2023, pp. 32–33). This helps us highlight the importance of considering not only the learning, compliance, and psychological costs of program participation, but also the eventual nonparticipation costs as a factor that drives individuals' decisions to engage or not in interactions with the state. In addition, the empirical evidence we present suggests that administrative burdens can have an acute negative impact on refugee sponsors. In this respect, our findings provide a strong argument in favor of simplifying sponsorship application processes to sustain and nurture public interest in refugee sponsorship.

We start with a brief overview of the administrative burden theory and the PSRP, followed by details on our data and analysis. Subsequently, we present the causes of administrative burdens in the PSRP and discuss their implications for sponsors and the program. In the concluding section, we offer some recommendations and suggestions for future research.

#### **Theoretical Framework**

Administrative burdens are "people's experience of policy implementation as onerous" (Moynihan & Herd, 2023). As a burgeoning body of public administration research has shown, administrative burdens can have far-reaching consequences (Masood & Nisar, 2021; Moynihan et al., 2022;

Yates et al., 2021). For example, onerous bureaucratic encounters can undermine individuals' access to services and rights, and by extension jeopardize governmental programs' effectiveness and success (Moynihan et al., 2015). Their impact might extend well beyond those who participate in governmental programs, with the intention to send a signal to the population at large (Keiser & Miller, 2020). Moreover, administrative burdens affect people unequally. Individuals with limited knowledge and resources are disproportionately "hurt" by administrative burdens because they are less equipped to navigate interactions with state bureaucracy (Carey et al., 2020; Chudnovsky & Peeters, 2021; Döring & Madsen, 2022). In short, administrative burdens are both consequential and distributive, and largely shape people's perception of government (Herd & Moynihan, 2018).

Despite some noteworthy conceptual vagueness (Baekgaard & Tankink, 2022), administrative burdens are commonly understood as a combination of learning, compliance, and psychological costs that individuals face in their interaction with the state (Herd & Moynihan, 2018; Moynihan et al., 2015). Learning costs pertain to the efforts spent on obtaining knowledge and information about governmental programs and the respective eligibility and participation conditions (Döring & Madsen, 2022, p. 672). Compliance costs are the hassles involved in fulfilling program requirements, such as spending time and money to collect necessary evidence, complete application forms, or access services that are needed for the application (e.g., accountant, lawyer, etc.) (Baekgaard et al., 2021, p. 185; Yates et al., 2021). Lastly, psychological costs is a rather broad umbrella term that designates different emotional and psychological discomforts of dealing with administrative processes, including stress, frustration, anger, and confusion (Baekgaard & Tankink, 2022; Döring & Madsen, 2022; Moynihan et al., 2022; Moynihan et al., 2015). Importantly, these three types of costs are interrelated and at times it might be challenging to draw a clear distinction between them in empirical studies (Baekgaard & Tankink, 2022).

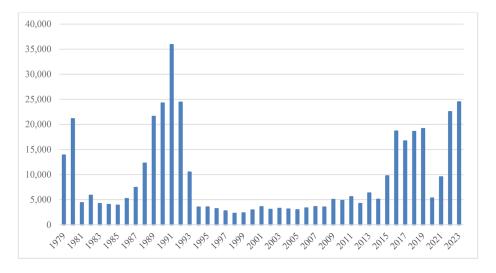
The learning, compliance, and psychological costs involved in state-citizen interactions have consequences for both individuals' responses and program outcomes. For example, high learning costs can exclude eligible candidates who do not fully understand the parameters of the program. In this regard, governmental agencies and civil society organizations can play an important role in reducing learning costs by providing information and support to citizens (Moynihan et al., 2015; Nisar, 2018). High compliance costs, such as filling out lengthy and overly complex forms or meeting stringent requirements, are strongly associated with low program uptake (Yates et al., 2021). The inverse is also true, as simplifying paperwork and providing application support can increase program participation (Herd & Moynihan, 2018). Lastly, psychological costs can have long-term negative effects on individuals that outlast program participation, such as anxiety and depression (Moynihan et al., 2022). In any case, rather than passively accepting administrative burdens, individuals often resist them and develop strategies to reduce them. In this respect, the higher the social, economic, cultural, and administrative capital that one has, the lower the learning, compliance, and psychological costs that they are expected to experience (Masood & Nisar, 2021).

While our main focus is on the causes and consequences of administrative burdens, it is important to note that scholars have also explored the question of why governments impose such burdens, or in other words, the sources of administrative burdens. Perhaps the most prominent answer has been that administrative burdens can be a form of "policymaking by other means": an ideologically driven strategy that helps governments achieve political goals through seemingly apolitical means (Baekgaard et al., 2021; Herd & Moynihan, 2018). In addition, administrative burdens may be rooted in the informal practices of civil servants responsible for program delivery, or simply be the result of unintentional neglect or failure of politicians or bureaucrats to consider the consequences of their practices (Peeters, 2020). In any case, administrative burdens should not be perceived as "inherently bad", as they may well "serve legitimate purposes of protecting program integrity and avoiding fraud" (Halling & Bækgaard, 2023, p. 34). Nevertheless, anecdotal evidence for fraudulent or mis- use of resources can also be instrumentalized toward advancing political goals if it is used as a justification to introduce measures that disproportionately affect a large group of beneficiaries and make them withdraw from the program (Moynihan et al., 2015).

Overall, the administrative burden scholarship sheds light on the sources, causes, and consequences of onerous experiences that individuals have in their interactions with the state. While this scholarship has recently explored bureaucratic hurdles in immigration and citizenship programs (Heinrich, 2018; Moynihan et al., 2022; Ray et al., 2023), it has not engaged in the study of refugee sponsorship programs.

### The Canadian Private Sponsorship of Refugees Program

The administrative burden framework provides a good vantage point for an inquiry into the causes and consequences of the learning, compliance, and psychological costs that refugee sponsors face in the context of the Private Sponsorship of Refugees Program. Rooted in the involvement of religious and ethnic communities in refugee resettlement after World War II (Cameron, 2020), the PSRP was formally established in the late 1970s, in the midst of the Indochina refugee crisis (Adelman, 1982; Molloy et al., 2017). Since then, private sponsors have facilitated the arrival and settlement in Canada of more than 420,000 refugees.



Graph 1. Canada – Admission of privately sponsored refugees, 1979 – 2023.

Source: Compiled by the authors based on data from Treviranus and Casasola (2003), Immigration, Refugees, and Citizenship Canada, and Annual Reports to Parliament on Immigration (2015–2023).

Depending on who the sponsor is, one can distinguish three sponsorship streams under the PSRP (Van Haren, 2021). First, refugees can be sponsored by a *Sponsorship Agreement Holder* (SAH), which is an organization that has signed an agreement with the government for repeated sponsorships. As of 2023, there are more than 130 SAHs across Canada, most of them religious and ethnic- or community-based organizations. Importantly, many SAHs—especially large, religious-based organizations—facilitate refugee sponsorships for numerous local sponsor groups known as "constituent groups" (e.g., local churches). In these arrangements, the interaction of local groups with the government is therefore mediated by the SAH. Second, refugees can be sponsored by *Groups of Five* (G5), which include five or more citizens or permanent residents who enter into a one-off sponsorship agreement directly with the government. Third, organizations, associations, and corporations can sponsor refugees on an ad-hoc basis, in which case they are designated as *Community Sponsors* (CS). Regardless of the sponsorship stream, sponsors commit to providing financial, social, and emotional support to the refugees for a period of one year, or until the newcomers become self-sufficient—whichever comes first (Government of Canada, 2023).

In terms of current process, SAHs, G5s, and CS prepare their sponsorship applications and submit them for review to the Resettlement Operations Center in Ottawa (ROC-O): an office within Immigration, Refugees and Citizenship Canada (IRCC), the governmental department responsible for immigration matters. If the sponsors meet program requirements and the refugee applicant is considered eligible for the program, ROC-O sends the application to a Canadian Visa Office abroad. The Visa Office then invites the refugee applicant to an interview that aims to confirm their eligibility. To be officially accepted for the program, refugees must also pass medical, security, and admissibility checks (Government of Canada, 2023).

The PSRP also includes a rather unique feature known as "the naming principle" (Lehr & Dyck, 2020). Simply put, in contrast to other smaller programs that facilitate sponsoring strangers (e.g., the Blended Visa Office-Referred Program; See McNally, 2020), the PSRP allows sponsors to choose the refugees they would like to help. Over the years, the naming principle has led to a crucial unintended consequence. In the early days of the program, Canadian sponsors overwhelmingly supported strangers fleeing Vietnam, Laos, and Cambodia (Adelman, 1982). Over the years, however, members of different diaspora communities—including Ethiopians, Syrians, and Afghans, among others-started engaging in the program to sponsor their displaced relatives abroad. As a result, a considerable part of all private sponsorships since the 1990s constitute cases of extended family reunification (Employment & Immigration Canada, 1992; Immigration Refugees & Citizenship Canada, 2016; Treviranus & Casasola, 2003). In addition, as several recent studies have shown (Hyndman et al., 2021; Krause, 2020; Macklin et al., 2018), one can distinguish between two major groups of refugee sponsors: highly skilled older/retired Canadians who sponsor refugees because of religious or global justice commitments, and relatively recently arrived immigrants (including refugees) who are not yet well-settled in Canada and who sponsor their displaced kin. Because of their different characteristics and resources (e.g., human, financial, and social capital), it is expected that these two types of sponsors experience and cope with administrative burdens differently (Carey et al., 2020; Herd & Moynihan, 2018).

#### **Data and Analysis**

Our interest in the administrative burdens in the PSRP was ignited by the early analysis of interviews conducted in the framework of a research project that focused on the role of sponsors in the settlement of refugee newcomers in Canada. Throughout the course of these interviews, individual sponsors and SAH representatives repeatedly and without prompting brought up their concerns with extensive paperwork, onerous requirements, and long processing times in the PSRP. We followed this analytical lead in subsequent interviews and inquired further into the administrative burdens that individuals and organizations faced, their impacts on sponsors, and the potential consequences for the program. Overall, we conducted fifty-nine semi-structured interviews with a total of 65 individuals in the period April 2022-May 2023. In addition to individual sponsors and SAH representatives, we spoke to settlement workers, former and current civil servants, and other practitioners with expertise in the PSRP. We used a maximum variation sampling and recruited sponsors from different ethnic backgrounds who had participated in each of the three PSRP streams (SAH, G5, and CS). In terms of SAHs, we included both large religious-based organizations and small (ethnic) community-based organizations. Many of our respondents had worn multiple hats (e.g., former sponsors who subsequently became SAH representatives or settlement workers), and some of our most insightful conversations were with "seasoned" sponsors who had participated in the program since its early days.

To better understand the causes of administrative burdens in the PSRP, we catalogued the changes in the design and implementation of the program since 1979. More concretely, we reviewed archival data from the Library and Archives Canada and the City of Ottawa Archives, including application forms, guidelines for sponsors (issued by the Canadian Government and the sponsorship community), operational instructions/manuals for governmental staff working on the PSRP, regulatory amendments, and program evaluations/audits. For the period from the

1990s onwards, we accessed such materials through the IRCC departmental library, the Wayback Machine internet archive, and the Refugee Sponsorship Training Program website. Finally, we also reviewed media publications pertaining to recent changes in the PSRP commonly known as the Program Integrity Framework (Government of Canada, 2021b).

We conducted the analysis of our data in parallel with their collection using a combination of inductive and deductive logic. The interview transcripts were analyzed in NVivo through the prism of the administrative burden theoretical framework and with focus on the causes and consequences of learning, compliance, and psychological costs for sponsors. Following the suggestion of Baekgaard and Tankink (2022), we distinguished between state actions—i.e., changes in the program design and implementation—and individual experiences of administrative burdens of sponsors affected by these state actions. In this respect, the insights we derived from the interview analysis informed our cataloguing of administrative changes and vice versa.

In terms of limitations, we acknowledge that despite our best efforts we may have omitted some of the administrative changes that have taken place in the PSRP throughout more than four decades of program implementation. In addition, although we interviewed a number of long-term sponsors, it is impossible to obtain a comprehensive picture of sponsors' experiences of administrative burdens in the past. Notwithstanding these shortcomings, the extensive primary and secondary data that we collected provides a solid foundation for an exploratory inquiry such as ours.

#### **Results and Discussion**

In a nutshell, our analysis reveals a gradual and significant increase in the administrative burdens for sponsors since the introduction of the Private Sponsorship of Refugees Program. We argue that this has been caused by a series of changes pertaining to: 1) the sponsorship application package, and 2) the requirements for sponsors and sponsoring organizations (See Appendix). Initially, we zoom in on each of these two program aspects and shed light on sponsors' experiences of administrative burdens. Subsequently, we discuss the consequences of administrative burdens for refugee sponsors and program uptake, highlighting the disproportionate weight of learning, compliance, and psychological costs on those individuals who sponsor their displaced kin.

### Administrative Burdens in the PSRP Application Package

Absurd! Absurd! You, know, there was less paper involved in planning the invasion of Normandy than [laughs]... I think it's bureaucracy gone wild! Why do you need all this information? Because there aren't enough civil servants to read the damn stuff! (Former civil servant)

When the PSRP first launched, individual groups could apply to sponsor refugees with little paperwork. Sponsor groups would fill in a one-page application form (IMM1266E), providing details about the group's make-up and whether it was affiliated with any religious institution. Additionally, groups would complete a one-page Notice of Intent to Sponsor (IMM1267), which allowed them to name a refugee or specify any preferences for refugees from a certain affinity group. Once the sponsor group was matched with the refugee applicant, a one-page Undertaking (IMM1268E) would be signed by all group members, committing them to their sponsor responsibilities.

Some sponsors we interviewed fondly recalled the light paperwork from the early days of the PSRP. Those who had sponsored Indochinese refugees in the end of the 1970s and early 1980s described the process as "simple", "straightforward" and "direct", explicitly referencing the short application forms that one could complete at a sponsorship information meeting in a local community center or library (See also Denton, 2003). Sponsors' reflections of the program's initial simplicity came in stark contrast with more recent experiences:

And if you know anything about the paperwork in Canada, you know, those two pages I filled out for the other guys [Cambodian refugees], forget it. About 60 pages [laughs]. (SAH-affiliated sponsor)



Applications - you know, if you know the history - when the program started in 78'/79' with the boat people, it was a one-page document that you would fill out. When I started this in 2016, applications were maybe like 20 pages. Now they're like 150 pages. (G5 sponsor)

Our interview analysis shows an overwhelming sense that the current PSRP application forms are burdensome, difficult to complete, and a source of near unanimously unpleasant experience. This was clearly reflected in the language of our respondents, which signaled high learning, compliance, and psychological costs. Sponsors described the application forms as "lengthy", "onerous", "miserable", and "absurd", and the experience of completing them as "infuriating", "daunting", "frustrating", "discouraging", and "overwhelming". A G5 sponsor who had supported numerous applications shared that filling out the forms is "a hell of a lot of work", costing him on average 30 h per application to complete. Similarly, a SAH representative with two decades of experience in the PSRP noted that the pre-arrival form-filling takes on average 35 h per case. Because application packages are so time-consuming to read, understand, and complete, some sponsors-including highly skilled professionals-had to take leave from work.

I'm a lawyer. It taxed this brain up here to the limit for me - with the help of a very intelligent translator and these people [the refugee applicants] - to get these forms done. By the time I was done, it was 51 attachments to my email to Immigration Canada. [...] Anyway, I took two weeks of vacation. It took so much time; it took me two weeks of vacation to complete those forms. (G5 sponsor)

Although some sponsors admitted that they did not mind the paperwork per se, they still recognized how high the learning costs stemming from the volume and complexity of the application package might be for others.

I personally am not intimidated by the, the paperwork, despite the fact that the government probably couldn't make it any more difficult than it is to complete the myriad of applications and to read and understand. [...] I am a university professor and I have trouble understanding some of these sometimes, with English as my first language. (SAH-affiliated sponsor)

Our archival research and document review provided further insight into the causes of administrative burdens related to the application forms. One particular regulatory amendment in 2012 significantly increased the amount of paperwork that sponsors had to handle. Prior to this amendment, sponsors had to submit documents to IRCC that demonstrated their desire, eligibility, and capacity to sponsor refugees. Once their application was approved, a Canadian Visa Office abroad would send a permanent resident application (IMM008) and interview invitation to the sponsor's named refugee applicant (Appendix 6 "Analysis of Visa Office questionnaires" in Employment & Immigration Canada, 1991). This approach presented some notable flaws, including long processing times (difficult communication between Visa Offices and refugees) and high rejection rates (sponsors would often name someone who was ultimately not recognized by the visa officer as a person in need of international protection). To address these shortcomings, the government made it obligatory for sponsors to submit the refugee's application for protection along with the sponsors' application ("Regulations Amending the Immigration and Refugee Protection Regulations," 2012).

This attempt to streamline the application process made sponsors responsible for submitting the entire document package. In addition to the permanent resident application (IMM0008), sponsors have to fill in and submit two more forms detailing the background information of the refugee applicant and their family members, known as Schedule A (IMM5669) and Schedule 2 (IMM0008-2). Along with copies of identification documents, the forms demand a high level of detail on the circumstances under which the refugee applicants left their home countries. It is important to note that many of the now mandatory fields in the application forms contain information that was only "desired," but not required, by Visa Officers in the beginning of the 1990s (Appendix 6 "Analysis of Visa Office questionnaires" in Employment & Immigration Canada, 1991). Over the years, sponsors have therefore become responsible for gathering increasingly extensive details about (traumatic) events in the lives of refugees—while also potentially facing significant language barriers—thus incurring higher compliance and psychological costs.

Trying to get somebody who's a refugee in Lebanon to remember what public school they attended in Syria. [...] And what were the years? [...] How did you escape the country? [...] And sometimes refugees want to wipe that stuff out of their memories [...] And yet [we have] to encourage them and to insist that they provide every single detail you can remember. (SAH-affiliated sponsor)

Lastly, we also identified learning and psychological costs related to some gaps in the provision of support to sponsors who struggled with finding the information they needed or faced form-related challenges. This was especially the case for sponsors from the G5 and the CS streams, who benefit neither from the sometimes shorter application package for SAHs, nor from the support that some SAHs provide in clarifying program parameters and preparing sponsorship applications. While our interviewees were generally satisfied with the services of the Refugee Sponsorship Training Program—a government-funded program which provides information and training to sponsors—they often expressed frustration with the sponsor guides on the IRCC website. For example, one sponsor compared the website to "an octopus" where people "get lost" rather than finding the information they need. Echoing this view, another G5 sponsor described how she "follow[ed] all these links—link, link, link, link—and the final link was to say essentially: Don't call us. We'll call you". Notably, seasoned sponsors again contrasted the lack of in-person support with their experience in the early years of the PSRP.

We used to be able to go and have a quick appointment with a, with an officer at the, you know, a government settlement officer, or project officer, within an afternoon or two days. That sort of thing doesn't happen anymore. (G5 sponsor)

In sum, our analysis suggests that the growing volume and complexity of the application package has led to a significant increase in the learning, compliance, and psychological costs for sponsors. We now move on to the second aspect of the PSRP that we identified as a cause of administrative burdens: sponsorship requirements.

#### Administrative Burdens in Sponsorship Requirements

A number of sponsors we interviewed expressed frustration with the requirements they had to meet in order to participate in the program. In this respect, and as with the application forms, our analysis suggests a gradual and steady increase in administrative burdens. The causes of these burdens were primarily the more stringent financial requirements and criminal background checks, which were introduced in the context of ever longer processing times.

At the outset of the PSRP, the requirements for sponsors were minimal outside the need to demonstrate financial capacity. During the program's initial sponsor recruitment wave of 1979, the financial capacity of each sponsor could be proven by a confidential statement from their employer. The statement would need to confirm the permanency and approximate salary of the sponsor, and the group's total financial capacity would commonly be tallied by organizations holding an agreement with the government (i.e., SAH predecessors known as Master Agreement Holders). Alternatively, sponsors could approach an organization as individuals, submit their financial confirmation document confidentially, and be matched into a sponsor group based on their financial capacity (Operation Lifeline, 1981).

The financial requirements for sponsors remained largely the same throughout the 1980s and the 1990s, with sponsorship funding coming primarily from community fundraising, churches/ faith-based organizations, or private funds of the sponsors themselves (p. 4 in Appendix 4 "Analysis of sponsoring group questionnaires" in Employment & Immigration Canada, 1991). However, much of the data that we were able to analyze from this period is skewed toward sponsor groups affiliated with faith-based organizations holding agreements with the government, and therefore do not necessarily reflect possible issues with financial requirements among G5 sponsors. During PSRP evaluations, for example, very few questionnaire responses were received from secular groups that were known to immigration authorities to source funding from relatives of the refugee applicants in Canada, or even at times from the refugee applicants themselves (Appendix 1 "Reports and a summary of refugee focus groups" in Employment & Immigration Canada, 1991). The latter was particularly concerning for the government because the PSRP explicitly prohibits refugee applicants from financially contributing to their own sponsorship (Government of Canada, 2021a). Presumptively to steer the program away from this pay-to-play direction, the government gradually enacted greater financial requirements for sponsors. Financial profiles were introduced, requiring each G5 member to submit a complete breakdown of their financial sponsorship capacity as part of the application process. In the same vein, income disclosure was no longer made by an employment letter of approximate salary, but by an income tax Notice of Assessment or other official documents, such as tax forms, income slips, or pension statements (Government of Canada, 2021a).

In 2018, further amendments brought about more stringent requirements around funds held in trust, the role of financial institutions, and contingency plans to demonstrate financial capacity for non-accompanying family members of the sponsored refugee.<sup>2</sup> Although trust accounts allow sponsor groups to bypass the detailed personal financial disclosure by contributing funds to an account, they pose other challenges for sponsors to meet the financial rigor set out by the government. For example, a new trust must be set up for each sponsorship and the account must be in the name of the refugee principal applicant. Additionally, every bank statement since the trust's creation must be provided with the application (Government of Canada, 2021a). These requirements significantly increased the compliance costs for sponsors.

And the proof of funding gets more intense. Like, I can spend like 8 hours just on a funds explanation letter these days because they [IRCC] want like absolutely everything, like wire transfer from the giver, bank account receiving the money, driver's license, full information on who donated... Only, there's 30 donors, so one for every single... Like, it's insane! (G5 sponsor)

In addition, many SAH-affiliated sponsors have been facing more burdensome financial requirements over recent years because of the IRCC assurance activities. Prior to 2019, the PSRP monitoring was solely responsive; the government conducted post-arrival checks only if an issue was brought to their attention (e.g., newcomers complaining to IRCC about not receiving adequate support from their sponsors). Following an audit of the program in 2019-2021 that detected quality issues in all three streams, IRCC introduced its Program Integrity Framework, which included proactive assurance activities in the form of random sponsorship checks (Government of Canada, 2021b). These checks put SAHs at risk of having their Sponsorship Agreements suspended if any irregularities are conducted by their affiliate sponsor groups.3 As a result, SAHs started imposing new requirements on their sponsoring groups—particularly financial and reporting ones—in a rather arbitrary and uncoordinated way. Examples include requiring all or a large part of the sponsorship funds prior the application submission, tracking and keeping evidence of all sponsorship-related expenses, and reporting regularly on the settlement progress of the newcomers. The increased scrutiny of the government thus ultimately translated into additional administrative burdens for sponsors.

And I think we have to track all these things because IRCC can come back and audit our situations. And [SAH name], they are very concerned, you know, if they lose their SAH designation. So, we respect that, and we follow through because we respect [SAH name], and we want them to have their designation. But it is just becoming quite a bureaucratic nightmare. And we're in this for the people, so we can tolerate some of that, and we try to tolerate more, but it's difficult. (SAH-affiliated sponsor)

To fully understand the administrative burdens that financial and other requirements pose on sponsors, one must review these requirements against the backdrop of lengthy application processing times. At present, sponsored refugees can commonly expect not to arrive in Canada until two to three years after the submission of their sponsorship application (Allen, 2022).



Our interviewees generally expressed frustration with the unpredictability and the material, emotional, and psychological costs related to such long waiting times. For many, the slow processing made sponsor requirements at the time of application appear rather preposterous. For instance, if a refugee family arrives a few years down the road, they may have a newborn, or their children may become adults, which would significantly increase the financial support that sponsors must provide. In addition, several interviewees highlighted that long waiting times in combination with the requirement of many SAHs to have the sponsorship funds up-front was detrimental for sponsor groups' enthusiasm and commitment.

[T]hat is where the requirement to have 50 or 75 percent of that money in as the application goes in; to explain that to a congregation is like: "Oh, a family is going to arrive - I don't know - two, three, five years from now, but we need money now." And that money is just going to sit in a bank account. How do you...? Then, people who are donating, who believe in this cause, are losing their connection with it. And they're not going to support it in the same way! (SAH-affiliated sponsor)

Similarly, long processing times made sponsors question the utility of submitting background checks at the time of application as per the program requirement. Criminal background checks were introduced in the PSRP with the Sponsor Assessment form (IMM5492) in 2002. The form requires each G5 sponsor group member to disclose any information about them having been the subject of certain criminal convictions, orders to leave Canada, or defaults on court-ordered payments.

I find it strange that they, you know, you apply, and they do all the, the background checks and everything at the beginning and maybe three years later, you know, status has changed. [...] [I]t just doesn't make sense that all this, like the financial checks, background checks, all that stuff are done maybe three years before the person arrives and the situation has changed completely (G5 sponsor).

Lastly, our analysis also shows that the requirements around financial and criminal background checks have led to concerns regarding confidentiality. This was particularly the case for G5 sponsorships, where it is common that one member of the group collects all necessary information and documents and submits the application package. Up until 2018, the guides accompanying the application forms provided that each group member's financial profile could be submitted separately and confidentially to IRCC. However, the latest guide on filling out sponsorship forms no longer explicitly permits sponsors to separately submit their financial forms to the government. At the same time, another change implemented in 2018 saw the Sponsor Assessment form provide sponsors the option to choose whether IRCC could disclose their possible ineligibility to the other group members. Moving from a system where sponsors could submit their forms separately to an "opt-in" approach to confidentiality where a sponsor must elect to have their sensitive information protected has increased the psychological costs for sponsors, who are often hesitant about disclosing sensitive personal or financial information.

Most of the group members do not want to share. [...] [E]ven though they are willing to pay money, they don't want to share their bank information; they don't want the other group members [...] to see the amount of money, because they have to attach the bank statement, or if they have to attach T4's [Statement of Remuneration Paid] instead of Notices of Assessment, and in the T4 there are SIN [Social Insurance Number numbers, and they don't want this information to be shared among each other. (Settlement worker)

In sum, administrative changes, especially in the last few years, have placed significant pressure on individuals who want to sponsor refugees through the PSRP. Having shed light on the causes of increased administrative burdens for sponsors, we now turn to discussing the consequences of these burdens.

#### The Consequences of Administrative Burdens for Sponsors and the PSRP

The findings of our interview analysis suggest that the administrative burdens in the PSRP have been highly consequential for sponsors. As expected, the two large groups of PSRP sponsors— Canadians driven by religious or global justice commitments and recent immigrants/refugees

sponsoring displaced kin (Hyndman et al., 2021)—have been affected differently by the increasingly burdensome application forms and sponsorship requirements. As we discuss below, this may have significant implications for the future of the program.

Our Canadian interviewees overwhelmingly shared the concern that administrative burdens were turning refugee sponsorship into a "paperwork experience". As these sponsors were largely motivated by their passion to assist refugees, they felt that the growing PSRP requirements took away energy and time from the truly important aspects of their contribution. Indicatively, sponsors often juxtaposed the deeply personal and rewarding experience of welcoming and supporting refugee newcomers with the daunting experience of completing the necessary paperwork.

I've had such an amazingly positive experience with the whole thing. And it was ridiculously hard and complicated, and difficult to do. And I just feel like the people that I've assisted are the best Canadian citizens you could ever hope for and it's ridiculous that it's so hard to do this. It's outrageous. (G5

For some interviewees, the shift toward a paperwork experience entailed significant risks. A former civil servant cautioned that this shift was swerving the program away from its original idea and spirit, namely "to take advantage of the good nature and generosity of our fellow citizens". These concerns were echoed by an experienced G5 sponsor:

But it's going to stop being private sponsorship; the idea of private sponsorship is that five ordinary citizens can help a refugee start a new life. Well, the more requirements and burdens placed on this program, it's gonna be like five ordinary people who have the organizational support of a Sponsorship Agreement Holder, and have possibly hired an immigration consultant for \$3,000, and maybe have a lawyer to help, and an accountant, can do it! Right? That's not the spirit of private sponsorship and it's definitely heading in the wrong direction.

Although many Canadian sponsors acknowledged the importance of and need for governmental scrutiny, they thought that the current administrative burdens in the PSRP were disproportionately high. This was especially the case for repeat sponsors, who felt that they had already "proven themselves" by having completed multiple sponsorships. As a result, a number of sponsors in our sample shared that they were less likely to reengage in the PSRP, at least in the short term. Therefore, in line with administrative burden theory (Herd & Moynihan, 2018), our findings suggest that the growing bureaucratic hurdles in the PSRP taint the experience of Canadian sponsors and discourage them from (re)sponsoring refugees.

Our findings also suggest that the consequences of administrative burdens are different for those who sponsor displaced kin. More specifically, our analysis shows that these sponsors feel the "bite" of higher learning, compliance, and psychological costs much more acutely than Canadian sponsors. This discrepancy can be explained by differences in the demographic profiles of the two groups. In contrast to the general characteristics of Canadian sponsors (Macklin et al., 2018), those who sponsor displaced relatives are often immigrants or refugees who are not well-settled in Canada and have more limited finances, time, English language skills, and experience with bureaucratic practices (Krause, 2020). Consequently, for many of them it is very challenging or even impossible to prepare and submit a sponsorship application without the help of a third party, despite the availability of online guides in several foreign languages. As explained by a settlement worker who has been primarily assisting such sponsors, "the majority of the sponsors are even incapable of completing the forms that we share with them, so let alone going to the RSTP website and then read[ing] all the instructions or support information that they've provided". Although Sponsorship Agreement Holders also provide support with applications, many of them have limited organizational resources and capacity. Consequently, individuals who want to sponsor relatives through the PSRP commonly turn to community members with experience in refugee sponsorship or to volunteers (e.g., university staff or students). Those who cannot find assistance for free may ultimately resort to immigration lawyers and consultants, potentially costing them up to several thousand dollars per application. Regardless

of all these administrative burdens, however, these sponsors are ready to go through anything to bring their loved ones to safety, because, as one such sponsor noted, "family is like, you know, you're kind of-you're helping yourself, right? Because it's family. It's your own bloodline or whatever you will call it".

Beyond the equity concerns it raises, the differential impact of administrative burdens on the two major groups of PSRP sponsors may also have long-term consequences for the program. To elaborate, for Canadian sponsors, nonparticipation in the PSRP might not come at a high price. Ultimately, the PSRP is a program that facilitates provision of voluntary support to refugees in need, and as such it competes for the interest of individuals with a range of other initiatives (e.g., assisting government-resettled refugees or asylum seekers). In other words, administrative burdens may easily deflect the compassion of Canadian sponsors to other activities, especially at a time when these sponsors already struggle with structural issues like lack of affordable housing and insufficient settlement services (Elcioglu, 2021). For those who sponsor displaced relatives however, the cost of nonparticipation in the PSRP might be enormous, including separation from loved ones or intense feelings of guilt and self-blame. Administrative burdens may thus reduce program uptake among the former group of sponsors, but have little effect on the motivation of the latter group to sponsor, especially considering the continuously growing global displacement and resettlement needs. As a result, the PSRP risks drifting further away from its original purpose and solidifying as a channel for the reunification of extended refugee families: a trend that has already been well documented (Krause, 2020; Treviranus & Casasola, 2003).

On a final note, the above discussion on the cost of nonparticipation helps explain an apparent contradiction between our findings and administrative burdens theory. To clarify, numerous studies show that one of the effects of administrative burdens is lower program uptake (Döring & Madsen, 2022; Herd & Moynihan, 2018; Masood & Nisar, 2021; Yates et al., 2021). This assumption is largely based on research examining state-citizen interaction in the context of welfare programs. In contrast, our research focuses on a community engagement type of program and shows that administrative burdens in the PSRP have been growing in recent years, while at the same time the number of sponsorships has been also increasing. In our view, this incongruency can be largely explained by increased program participation by sponsors seeking to resettle their displaced kin. In this respect, our research contributes to nuancing the theoretical link between administrative burdens and program uptake. Our findings suggest that studies on the impact of administrative burdens on program uptake would benefit from extending the focus beyond the learning, compliance, and psychological costs of program participation to also examine the other side of the coin: the cost of nonparticipation.

#### Conclusion, Recommendations, and Suggestions for Future Research

In this article, we explored the causes and consequences of administrative burdens in the Canadian Private Sponsorship of Refugees Program. Our analysis shows that over the four decades of program implementation, and especially so in the last few years, onerous paperwork and growing sponsorship requirements in the context of long processing times have led to a significant increase in sponsors' learning, compliance, and psychological costs. The PSRP application process has become more complex, resource intensive, and time-consuming for sponsors, subverting otherwise positive sponsorship experiences. In line with previous findings on the unequal impact of administrative burdens on different social groups, our study suggests that the growing bureaucratic hurdles affect differently the two large groups of PSRP sponsors. On the one hand, the more resourceful Canadian sponsors are generally discouraged from program participation by the administrative obstacles they face, even though they may be well equipped to cope with these obstacles. On the other hand, individuals who sponsor their displaced relatives are disproportionately harmed by the administrative burdens in the PSRP. However, as the program provides these individuals with the unique opportunity to bring their loved ones to safety in Canada, the obstacles posed by bureaucratic hurdles may ultimately have little effect on their motivation to continue sponsoring.

These findings have both theoretical and practical implications. Theoretically, we highlight the need to consider nonparticipation costs in discussions on the link between bureaucratic hurdles and program uptake. Further research in this direction could shed more light on why some individuals or social groups are more willing to endure administrative burdens and pay the price for participation in a governmental program, despite being aware of the significant learning, compliance, and psychological costs that await them. In practical terms, our findings suggest that administrative burdens have significant consequences for sponsors, and, by extension, for refugee sponsorship programs. In the case of the PSRP, the administrative burdens we identified have the potential to swerve the program further away from one of its original objectives: "engaging civil society in resettlement" ("Regulations Amending the Immigration and Refugee Protection Regulations," 2012). The sponsors' perspectives that our research relied on recall the words of Adelman and Alboim that "[t]he human [...] and personal rewards to both refugees and sponsors are too enormous to allow the program to wither away" under the pressure of bureaucratic hurdles (2014, p. 8). Ultimately, our findings show an acute need for administrative changes that would simplify the PSRP application process for all sponsors, and therefore help sustain and nurture the broad public interest in the program (Alboim, 2016).

Drawing on insights from our empirical findings and administrative burdens research, we make several practical recommendations under two broad headings. First, considering the commitment of the Canadian Government to increasing refugee intake through the PSRP (Immigration Refugees & Citizenship Canada, 2022b), the program should be made more accessible to potential sponsors regardless of their human, social, or administrative capital. Reducing paperwork, implementing more flexible participation requirements, and speeding up processing—as already suggested in previous reports (Canadian Council for Refugees, 2012)—would be good initial steps in this direction. Finding the right balance between a healthy level of sponsor scrutiny and a manageable application process can be best achieved through an ongoing, robust, and transparent conversation with the broad sponsorship community. Second, as suggested by some of our interviewees, making the application process more user-friendly may have a significant positive impact on sponsor experience. In fact, the IRCC has recently attempted this by replacing the previous system of submitting applications via e-mail with an online portal (Immigration Refugees & Citizenship Canada, 2023). The impact of this prima facie positive development remains to be assessed considering the nuanced findings of the emerging studies on the link between digital government and administrative burdens (Peeters, 2023). Another suggestion put forward by both sponsors and practitioners is to explore opportunities for cross-checking data between government agencies upon obtaining consent from sponsors. For example, in line with Canadian privacy laws, sponsors could consent to IRCC running a criminal background check on their behalf, as is done with many new federal government hires. This would save sponsors time, effort, and money and ensure that the government can access up-to-date information at the time of examining the sponsorship application.

Finally, we close with a suggestion for future research. While our focus in this article has been on the causes and consequences of administrative burdens in the PSRP, we believe that exploring the sources of these administrative burdens might be equally insightful. Our data provide some evidence suggesting integrity concerns as one reason for IRCC to introduce more stringent requirements for sponsors. Nevertheless, the relevance of other potential sources of administrative burdens, such as bureaucrats' coping mechanisms, unintentional neglect, or deliberate political strategy, should also be explored (Peeters, 2020). As demonstrated by the research on administrative burdens, evidence for fraud or program abuse can at times be used by governments to advance political goals under the guise of administrative and seemingly apolitical measures (Herd & Moynihan, 2018; Moynihan et al., 2015). We note that the administrative changes we described were introduced by both conservative and liberal governments. In this respect, the PSRP provides fertile ground for further exploring the link between political ideology



and willingness of policymakers to impose administrative burdens, which has been a central topic in administrative burden research to date (Herd & Moynihan, 2018; Moynihan et al., 2022).

#### **Notes**

- 1. "SPRING: Exploring elements of the Canadian Private Sponsorship of Refugees Program that facilitate refugee settlement" is a two-year research project (2021-2023) funded by the Social Sciences and Humanities Research Council of Canada and approved by the University of Ottawa Research Ethics Board (file number S-02-22-7701).
- 2. Sponsoring groups are responsible for providing settlement support also to refugee applicants' non-accompanying family members in cases where the latter resettle to Canada under the so-called One Year Window of Oppor-
- 3. In the SAH stream, the sponsorship responsibility ultimately falls on the organization that has signed a Sponsorship Agreement with the government, rather than on the individual sponsoring group that provides the settlement support.

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#### **Appendix**

Timeline of PSRP requirements/administrative changes causing the gradual increase of administrative burden for sponsors\*

- Sponsors were not background checked.
- Financial vetting was limited to a confidential statement from employer, confirming job permanency and approximate
- Sponsors could show up to a sponsorship meeting, fill out a one-page checklist, and be matched with a sponsor group and a refugee applicant.

#### 1991

- Sponsors were not responsible for refugee applicant's forms, as these were filled out abroad and coordinated through Canadian Visa Offices.
- Refugee applicants were required only to submit names of travel party, a written statement on eligibility, and UNHCR status/asylum registration.

#### 2000

Every sponsor who contributes financially to the sponsorship is now required to submit a financial profile form, as well as tax info, pay stub, or letter from employer.

#### 2002

- Each financial profile form must also list number of sponsor's financial dependents in Canada.
- Criminal record checks and background searches are now required by each sponsor.

Sponsors are tasked with filling out the forms of refugee applicants. Sponsors in Canada must obtain and document the personal histories, family information, and detailed background information of refugees abroad.

Sponsors are still required to provide funds for non-accompanying family members, though PSRP guides no longer contemplate contingency plan for non-accompanying family members.

#### 2018

- Sponsors in new jobs (<1 year) must now list all forms of income over the last 12 months.
- If sponsorship funds are held in trust, sponsor group must explain how all funds were acquired, including account statements signed and stamped by a financial institution.

#### 2020

- Due to increased governmental scrutiny, some SAHs require sponsoring groups to provide all or large part of the sponsorship funds upfront at the time of filing the application, while sponsored refugees commonly arrive 2-3 years after the submission of the application.
- If trust accounts are used, sponsors must provide every statement for the trust since its creation.
- PSRP guides no longer state that sponsors may submit documents separately and confidentially from other members of their sponsoring group.

<sup>\*</sup>Note that the dates in the above table reflect the archival data available to the authors at time of publication; certain changes may have been implemented in earlier years for which data was not accessible.