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Ontario Immigrant Nominee Program reset: Applicant pathways, employer-led workforce selection

By **Sergio R. Karas**

Law360 Canada (July 30, 2026, 2:01 PM EDT) -- Ontario has entered a new phase in provincial immigration. In June 2026, the province amended the regulations governing the Ontario Immigrant Nominee Program, closed the former stream structure, and introduced the Ontario Workforce Priority stream as the first phase of a broader redesign intended to align nominations more closely with labour-market demand, employer retention needs and program integrity.

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The headline change is simple but consequential: Ontario has moved away from a collection of familiar applicant categories and toward a more centralized, employer-connected selection model. Ontario says the redesign will streamline eight former streams into four, with the Ontario Workforce Priority stream launching first and three additional redesigned streams expected later in 2026. The official program update describes the June 2026 amendments as "phase 1" of a two-phase redesign and states that the former streams are closed to new invitations.

The June 2026 overhaul

The June 2026 amendments to O. Reg. 422/17 came into force on June 25, 2026. They removed the existing eight operational streams listed in Ontario's program update — Employer Job Offer: Foreign Worker, Employer Job Offer: In-Demand Skills, Employer Job Offer: International Student, Master's Graduate, PhD Graduate, Express Entry Human Capital Priorities, Express Entry French-Speaking Skilled Worker and Express Entry Skilled Trades — and introduced the Ontario Workforce Priority stream.

The current regulation gives the director authority, after considering any ministerial direction, to issue general or targeted invitations and to rank only candidates with labour-market or human-capital attributes that satisfy targets set for a category.

That change matters because it shifts OINP planning from "does the client fit a named stream?" to "does the candidate and employer match Ontario's current selection priorities?" Ontario's own scoring language now emphasizes education, language, regional settlement, skill and work experience, earnings history, immediate labour-market needs, and other employment-prospect factors.

The Ontario Workforce Priority stream

The new Ontario Workforce Priority stream has three regulatory categories: National Occupational Classification (NOC) TEER 0-3, TEER 4-5, and self-employed physicians. Ontario's public guidance describes the stream as available to eligible skilled foreign workers with a qualifying job offer and work experience in any NOC occupation, and to eligible self-employed physicians who do not have a job offer.

The TEER 0-3 pathway targets workers with a full-time and permanent Ontario job offer in NOC TEER 0, 1, 2 or 3 occupations. Applicants must generally show one of several work-experience routes: six months of consecutive full-time paid work in the job-offer position within the previous 12 months; three months for recent Ontario graduates; two years of cumulative experience in the same or specified related NOC occupations within the previous five years; or, where applicable, a required licence or authorization.

The TEER 0-3 pathway also introduces more consistent education and language requirements. The regulation requires a post-secondary degree or diploma of at least one year, or an equivalent foreign credential supported by a recent educational credential assessment. The public guidance regarding language requires Canadian Language Benchmark CLB 6 for most TEER 0-3 positions and CLB 5 for certain skilled trades, with specific exceptions for recent Ontario graduates and licensed occupations.

The TEER 4-5 pathway is broader than the old In-Demand Skills model because it applies to all TEER 4 and 5 occupations, rather than a closed occupation list. The minimum requirements include a full-time permanent Ontario job offer, nine months of cumulative full-time paid work experience in the job-offer position within the previous two years, CLB 4, and a Canadian secondary school diploma or equivalent.

The self-employed physician category is now a distinct route. A physician may qualify without a job offer if the physician is or will be self-employed, is a member in good standing of the College of Physicians and Surgeons of Ontario, holds an independent, academic or provisional certificate of registration, and is eligible to receive publicly funded health-service payments under the *Health Insurance Act*. This builds on 2025 and 2026 physician-specific changes: Ontario first allowed certain self-employed physicians to qualify without a job offer in January 2025, then in January 2026 added provisional certificates and removed postgraduate education licences because those licence-holders could not meet the OHIP billing requirement.

Why Ontario changed course

The policy rationale is explicit. Ontario says the redesign is intended to address critical workforce shortages, strengthen eligibility requirements, reduce duplication, and give the province more flexibility to target in-demand skills while protecting opportunities for Ontario workers. The June 2026 program update says the redesign will streamline permanent residence pathways for individuals with arranged employment, help employers retain proven talent in hard-to-fill roles, raise language and education benchmarks, strengthen program integrity, and improve access for rural and northern employers through more flexible revenue thresholds.

The allocation context is also important. In May 2025, Ontario warned that the federal government had reduced provincial nominee admissions by 50 per cent, creating fewer nominations and longer processing times. Ontario issued 10,750 nominations in 2025, while its 2026 federal allocation is 14,119 nominations. Ontario’s June 2026 news release states that demand continues to exceed available spots, which helps explain why the province is giving itself more tools to target, return, suspend or sequence intake.

Employer participation is now central

The 2025 Employer Portal was the operational turning point. Ontario launched the portal on July 2, 2025, shifting Employer Job Offer streams from an applicant-led model to an employer-led process in which the employer submits job and business information before the candidate can register an expression of interest.

Under the Ontario Workforce Priority process, the employer must first register in the Employer Portal and submit a job offer. The employee then has 30 calendar days to register an Expression of Interest (EOI) using the job offer ID. If the employee receives an invitation, the employer has 14 calendar days to submit the application for approval of the employment position, and the employee has 17 calendar days from the invitation date to submit the nomination application and payment after the employer has submitted its portion.

The portal rules also constrain who may act for the employer. The authorized signing officer must have legal authority to bind the business; employees seeking nomination cannot register on behalf of the employer or act as signing officer or employer contact; and a representative cannot register the business, create the job-offer draft, or sign and submit the employer application.

For employers, the substantive requirements remain compliance heavy. The employer must have been active for at least three years, maintain an Ontario place of business, meet location-based revenue thresholds, have the required number of Canadian citizen or permanent resident full-time employees, offer a full-time indeterminate position, meet the applicable wage benchmark, have no outstanding orders under the *Employment Standards Act, 2000* or *Occupational Health and Safety Act*, and, where required by the director, show reasonable but unsuccessful recruitment efforts for Canadians or permanent residents.

The revenue thresholds are now tiered more finely by location: $1 million in the most recently completed fiscal year for GTA work locations, $500,000 in the most recently completed fiscal year for specified census divisions such as Ottawa, Waterloo, Hamilton, Simcoe, Middlesex, Niagara and others, and $250,000 in each of the last two most recently completed fiscal years for other locations. For employers in northern and rural communities, this is one of the most significant changes because it may allow smaller businesses to participate where they previously struggled to meet program thresholds.

Compliance and enforcement have become defining features

Ontario's 2025-2026 changes cannot be understood as selection changes alone. They are also enforcement reforms. Effective July 1, 2025, O. Reg. 148/25 amended O. Reg. 422/17 to require a nomination applicant to attend any in-person interview requested by the director, including an interview separate and apart from others.

Ontario also expanded its authority to suspend or return applications before nomination. Current O. Reg. 421/17 allows the director to return applications and fees where warranted by factors such as nomination allocation, pending application volume, approval targets, federal processing status, systemic compliance or enforcement concerns, government policy priorities, unemployment rates, current or anticipated labour-market needs, housing availability, health and social-service capacity, lawful work status, current work in Ontario, approved job offers, language proficiency, employment and wage history, education, and Canadian work or education.

The October 2025 amendment, O. Reg. 241/25, is especially significant because it broadened the return factors beyond program capacity and labour needs to include housing, health and social-service capacity, unemployment, federal and provincial policy priorities, and applicant-specific labour-market attributes. That creates a more discretionary intake-control tool than practitioners were accustomed to under the old stream model.

Enforcement risk is now visible. Ontario's contraventions page confirms that applicants must provide information that is accurate, correct and not misleading, and that representatives must make reasonable efforts to ensure information is accurate, correct and not misleading. The same page states that inaccurate, incorrect or misleading information can lead to denial, cancellation, prosecution, administrative monetary penalties (AMPs) or bans, with AMPs capped at $150,000 per contravention and calculated under a formula that, after July 1, 2024, uses a $10,000 base amount for employers, representatives, recruiters or persons who obtained a financial benefit.

Ontario also shortened the response period for notices of intent to issue an AMP or ban order from 60 days to 30 days, and permits service by email, mail or personal delivery with deemed-delivery rules. In 2025, the OINP integrity team conducted site inspections and visits for 485 applications and issued 56 bans and 76 administrative penalties, according to Ontario's June 2026 release.

The most dramatic program-integrity event was the November 2025 suspension and return of outstanding Express Entry Skilled Trades applications. Ontario stated that a review identified systemic compliance and enforcement concerns, including systemic misrepresentation or fraud relating to Skilled Trades eligibility criteria, and that all outstanding Skilled Trades applications would be returned with fees refunded.

Unresolved issues remain. Ontario's June 2026 release says three more redesigned streams are expected later in 2026, but official OINP materials available as of July 23, 2026, do not provide final names, criteria or launch dates for those streams. Public commentary on the December 2025 Regulatory Registry proposal identified probable future Priority Healthcare, Entrepreneur and Exceptional Talent streams, but those should be treated as proposed or anticipated until Ontario publishes final program terms.

Practical implications

For employers, OINP support must now be treated as a regulated compliance exercise, not a favour to an employee. Employers should confirm revenue, headcount, wage calculations, work location, urgency, recruitment history, legal authority of the signing officer, and the accuracy of job duties before initiating a job offer in the portal. They must also report changes to job duties, wage, hours or term immediately, and the OINP may conduct post-nomination follow-ups and cancel approvals or nominations if conditions are not met.

For foreign workers, the new system rewards Ontario connection and employer linkage. Candidates already working for the supporting employer may benefit from the six-month or three-month recent-graduate pathways, while TEER 4-5 workers may benefit from the expansion to all TEER 4 and 5 occupations. But the same-employer work-experience rules, language requirements and education requirements may make some applicants who were viable under prior streams ineligible or delayed under the new model.

For international students, the change is mixed. Recent Ontario graduates receive meaningful accommodations, including shorter work-experience routes, possible language-test relief and, in some cases, low-wage eligibility for TEER 0-3 positions. But the closure of the International Student, Master's Graduate and PhD Graduate streams mean Ontario graduates can no longer assume that completion of a credential alone will support an OINP strategy; in most cases, the path now runs through a job offer, employer participation and EOI selection.

For immigration practitioners, the reforms raise the standard of due diligence. Lawyers should verify employer facts directly, document wage methodology, screen for equity ownership issues, confirm licensing and status, prepare for interviews, and warn clients that eligibility at filing does not guarantee selection or continued processing where Ontario exercises return authority. The Ontario Bar Association has already urged clearer guidance on in-person interviews, interpreter access, counsel participation, and procedural safeguards, and has warned that broad return powers may undermine predictability for employers and applicants who invested in complete applications under prior rules.

The new model is more employer-led, more discretionary and more compliance-driven than the former framework. If implemented transparently, the redesign could help Ontario use scarce nominations more strategically, support smaller regional employers and reduce fraud. If implemented unpredictably, it may make long-term planning harder for employers, foreign workers, graduates and counsel.

The practical advice is straightforward: treat every OINP file as both an immigration application and a regulatory compliance file. The decisive question is no longer only whether the applicant fits a stream. It is whether the applicant, employer and representative can prove — quickly, accurately and defensibly — that the nomination advances Ontario's current workforce priorities and can withstand program-integrity scrutiny.

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