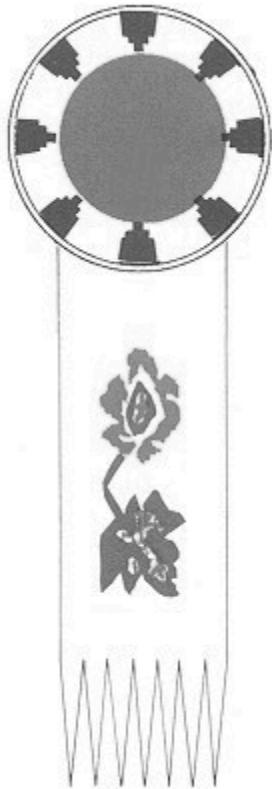


Native Women's Association of Canada



THE PROCESS OF APPLICATIONS FOR STATUS UNDER BILL C-31

~ May 31, 1988 ~

An analysis of DIAND
"S3" Data up to March 1988

An NWAC Analysis

Synopsis

This report summarizes information available from the Department of Indian and Northern Affairs (DINA) on the receipt and processing of applications under Bill C-31. The information is taken from DINA's "S3" reports. Information summarized in this report covers the period from July 1985 to March 1988 inclusive.

By March 31, 1988 DINA had received 54,795 applications covering 99,326 applicants. (Consistent with changes in reporting procedures implemented by DINA beginning with the October to December 1987 quarter, certain subcategories of the applicants are excluded from this total. For explanation see the footnote to Table 1.) The flow of applications has averaged 4,981 per quarter, covering an average 9,030 individuals per quarter. While the flow of applications appeared to peak in the 5th quarter (12,586 applications), the decline from the peak has not been consistent. However, in the last four quarters, the number of applications has been lower in each successive quarter. In the most recent quarter only 1,977 applications were received.

By March 31, 1988 DINA had made decisions on 50% of the applicants (49,840 of a total of 99,326). If the entire 11 quarters are reviewed, it is evident that DINA has had difficulty keeping pace with the flow of applicants. There have been 8 reporting periods; the number of decisions has exceeded the number of new applicants in only 3 of these periods. However, the number of decisions has exceeded the number of new applicants in both of the last two quarters. Thus, in both of the last two quarters there have been reductions in the size of the pool of waiting applicants.

At a more detailed level, the pattern of entering applicants and decisions might be reviewed as follows:

- DIAND's rates of decision making have been unstable. Decisions averaged 2,564 decisions per quarter in the first 1 1/2 years. There followed two quarters with very large numbers of decisions: 9,890 and 8,966. In the next three quarters, including the last quarter from January to March 1988) the number of decisions has averaged 5,199, rising slightly in each quarter (4,933, 5,286, 5,379).
- The flow of new applicants was heavy in the first 5 quarters (12,058 per quarter), dipped for 2 quarters (7,072, 5,361) rose to a second peak (10,608) but has since declined steadily (7,361, 4,082, 3,339).

Reductions in the size of the pool of undecided applicants are thus a function of:

- relatively stable decision rates in 3 successive quarters.
- a consistent decline in the number of applicants in successive quarters over the past year.

Because the number of applicants has now declined in four successive quarters, and because DINA's decision rate has been stable, we now project that application processing will be completed around the end of 1990 or early in 1991.

As might be expected, 77% of those who have had their status restored have been women who lost status through marriage to a non-Indian. For first time registrants, 86% have been under section 6 (2), the section under which first generation descendents with one parent eligible under 6 (1) are registered.

There was a change in the pattern of decisions made by DINA in the last year (quarters 8, 9, 10 and 11) compared with the first year and three-quarters.

The past year has seen:

- A sharp increase in the proportion of denials, (from an average of 9% of all decisions prior to the 8th quarter to 17% in the 8th quarter, 19% in the 9th, and 20% in each of the 10th and 11th). Corresponding to this there has been a decrease in the proportion of favourable decisions (to register or restore) while the percentage of confirmations has remained stable at approximately 6%.
- A shift in the ratio of restorations to registrations. Restorations as a percentage of favourable decisions have decreased from 40% prior to the 8th quarter to 29% in the 8th, 26% in the 9th, 23% in the 10th, and 22% in the 11th quarter. Registrations have shown a corresponding increase.
- Finally, a change in the distribution of favourable decisions over various eligibility categories again begins at the 8th quarter. In the first seven quarters 80% of restorations were under section 12 (1) B. These were restorations of women who lost status through marriage to a non-Indian. This percentage fell in the 8th quarter to 71%, 67% in the 9th, 69% in the 10th, and 70% in the 11th quarter. For registrations, the most important category has been section 6 (2) (those descendents with one parent entitled under 6 (1)). Prior to the 8th quarter the percentage registered under 6 (2) was 90%. The 8th and 9th quarter saw 83% of registrants in this category, and the 10th 79%. However, in the 11th quarter, the percentage has risen again to 86%.

The changing decision patterns in the last nine months of 1987 may indicate that the pool of "not decided" applicants increasingly comprises the descendents of the original women who lost status. These "not- decided" descendents are eligible (as registrations, if they are first generation children, not restorations) or are typically ineligible if they are grandchildren or even great grandchildren.

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1. Introduction

This report summarizes information available from the Department of Indian and Northern Affairs (DINA) on the receipt and processing of applications under Bill C-31. The information is taken from DINA's "S3" reports.

The purpose of this report is to examine and make comment on DINA's national data from S3 by analyzing:

- the processing of applications;
- acceptances and rejections; and
- the distribution of acceptances over various eligibility categories.

The first "S3" DINA report available to us was for the period ending June 30, 1986. This initial S3 report thus covers the 12 months following June 28, 1985, the date on which Bill C-31 received royal assent. Six additional S3 reports were available, each covering three-month periods ending on September 30 1986, December 31 1986, March 31 1987, June 30 1987, September 30 1987, December 31 1987, and March 31 1988.

2. Applications and Applicants

- a) As of March 31, 1988, DINA had received 54,795 applications covering 110,216 applicants. However, based on procedures instituted by DINA for the quarter ending March 31, 1988, 10,890 applicants in two categories were excluded from applicant counts (see the footnote to Table 1 for explanation). Thus DINA's count of eligible applicants as of March 31, 1988 was 99,326 (Table 1) an average 1.81 applicants per application.

The applications cover 53,521 adults, and 45,805 minors, or .86 children per adult application.

- b) In addition, by March 31, 1988, DINA had identified 3,646 applicants as duplicates, thus reducing the total number of eligible applicants to 95,680. No information is available on how many duplicates were adults and how many children.

TABLE 1: Applications and Applicants / 8 Periods

Period	Applications	Applicants Included by DINA			Applicants Excluded by DINA ¹		
		Adults	Minors	All	On behalf Minors / legally in- competent	Minors over 18	Total
Up to 30/6/86	20299	202311	16703	36934	68	4100	4168
(Avg / Qtrr up to 30/6/86)	(5075)	(5078)	(4176)	(9234)	(17)	(1025)	(1042)
July - Sept / 86	12586	12403	11446	23849	183	2555	2738
Oct – Dec / 86	3851	3835	3237	772	16	626	642
Jan – Mar / 87	3196	3053	2308	5361	143	790	933
Apr – June / 87	5733	5435	5173	10608	298	849	1147
July – Sept / 87	4222	3973	3388	7361	249	162	411
Oct – Dec / 87	2931	2775	2027	4802	156	312	468
Jan – Mar / 88	1977	1816	1523	3339	161	222	383
Total	54795	53521	45805	99326	1274	9616	10890
(Avg / Qtrr 11 Qtrrs)	(4981)	(4866)	(4164)	(9030)	(116)	(874)	(990)

¹ DINA's S3 reporting was modified in the quarter ending December 31st, 1987. Prior to this quarter, S3 counts of total applicants had included among other sub-categories:

- "persons applying on behalf of a minor child or legally incompetent adult", and
- "individuals shown as minors over eighteen years of age"

As of the October – December, 1987 quarter, these two categories were excluded from the count of total applicants. On March 31, 1988, applicants included in the "minors over 18" 9616.

DINA's decision to exclude these two categories created a discontinuity in the time series formed by successive S3 reports. In order to avoid distortions arising from this, we have adjusted S3 reports prior to the quarter ending on December 31st, 1987, so that they reflect the same procedures used for this most recent quarter. Thus the two categories have been removed from "total applicants" and totals recalculated from previous S3 reports.

In order to adjust subtotals of adult applicants and minor applicants, "persons applying on behalf of minors / legally incompetent adults" have been removed from the "adult applicants" category, and "minors over 18" from the "minor applicants" category.

- c) The flow of applications has varied in the two years and nine months since Bill C-31 became law. In the first 5 quarters DINA received 32,885 applications, an average of 6,577 applications per quarter. The peak quarter appears to have been July-September 1986 when 12,586 applications were received. The number of applications then fell in each of next two quarters (October-December 1986 = 3,851, January- March 1987 = 3,196). However it rose again in the period April-June 1987 (5,733 applications), remained relatively high (4,222 applications) in the quarter covering July to September 1987, but fell to 2,931 in the quarter ending December 31, 1987 and 1,977 in the most recent quarter ending March 31, 1988.

The average number of applications per quarter over the entire period is 4,981. The steady downward trend in applications received in the last three quarters suggests the depletion of the pool of potential applicants.

3. Processing

a) Processing: Introduction

An overall picture of DINA's progress in processing applications can be gained by grouping applicants into three main categories:

Decided: Applicants about whom decisions have been made. This category includes both favourable decisions (to reinstate, to register for the first time, or to confirm an existing status) and unfavourable ones (to deny registration or reinstatement). Duplicates in DINA's reporting are also placed in this latter category.

Not Decided: Those who have applied, but for whom no decision has been made.

Removed: The two categories described above (on behalf of others, and minors over 18) which DINA has recently decided to exclude from total applicants. (See Table 1 footnote for explanation.)

b) Decisions Made and the Entry of New Applicants

Table 2 shows the number of decisions made in each reporting period by DINA, in comparison with the number of new applicants who applied in each period. For completeness, Table 2 also shows the applicants DINA is now counting separately under "Removed".

TABLE 2: Decisions Made and New Applications / 8 Periods

Reporting Period	New Applicants	Decided	Removed
July / 85 – June / 86	36934	10390	4168
July – Sept / 86	23849	2023	2738
Oct – Dec / 86	7072	2973	642
Jan – Mar / 87	5361	9890	933
Apr – June / 87	10608	8966	1147
July – Sept / 87	7361	4933	411
Oct – Dec / 87	4802	5286	468
Jan – Mar / 88	3339	5379	383
TOTAL	99326	49840	10890

For applicants, obtaining a decision is key. Thus it is useful to begin by focusing on the number of decisions made by DINA. It is evident from Table 2 that DINA has had difficulty making decisions at a rate which keeps pace with the flow of applications. In all but three of the eight reporting periods, the number of new applicants has exceeded the number of decisions made. The three exceptions are the first quarter of 1987 (5,361 new applicants; 9,890 decisions), and the two most recent reporting periods, the last quarter of 1987 (4,802 applicants; 5,286 decisions) and the first quarter of 1988 (3,339 applicants; 5379 decisions).

The number of decisions made by DINA has varied substantially between reporting periods. In the first year and a half of processing, decisions averaged 2,564 per quarter. There was a dramatic increase in the first quarter of 1987 (9,890 decisions), and this increase was more or less sustained in the second quarter of 1987 (8,966 decisions). However, the number of decisions was substantially lower than this peak in each of the three most recent quarters: 4,933, 5,286, and 5,379 respectively. Thus, in the quarter ending March 31, 1988 the decision rate was twice that prevailing in the first year and a half, but approximately half the rate of the highest quarter.

c) The Pool of "Not decided" Applicants

Because new applicants have, for the most part, entered the process more rapidly than decisions have been made, the pool of applicants "not decided" has grown in five of eight reporting periods. Table 3 shows the relevant data.

TABLE 3: Decided Applicants and the Pool of “Not-Decided” / 8 Periods

Reporting Period	Not Decided	Decided	Total
July / 85 – June / 86	26544	10390	36934
July – Sept / 86	48370	12413	60783
Oct – Dec / 86	52469	15386	67855
Jan – Mar / 87	47940	25276	73216
Apr – June / 87	49582	34242	83824
July – Sept / 87	52010	39175	91185
Oct – Dec / 87	51526	44461	95987
Jan – Mar / 88	49486	49840	99326

On March 31, 1988 "not decided" applicants numbered 49,486 some 50% of the total of 99,326. The pool of "not decided" applicants was at its highest (52,469) on December 31, 1986. Thus the current "not decided" pool contains only 2,983 individuals fewer than it did at its peak in December 1986.

d) Processing: Summary and Comment

From an applicant standpoint, the ratios of decisions made to new applicants has presented a disheartening picture for most of the series.

The average inflow of new applicants has been 9,030 per quarter. In contrast, the average number of decisions per quarter has been 4,531, half the average number of new applicants. Thus the pool of applicants has grown by an average 4,499 individuals per quarter. However, these overall average rates are strongly influenced by the first six quarters when the average number of applicants per quarter was 11,309 and the average number of decisions was only 2,564. The comparison for the five quarters in 1987 and 1988 has been better: 6,294 applicants per quarter vs. 6,891 decisions per quarter.

Nevertheless, to date DINA has achieved decision rates which are higher than applicant inflow only in exceptional quarters. The result has been the perpetuation of a large pool of not-decided applicants.

**4. Projecting Applicant Processing:
When will the processing of applications be complete?**

Because the downward trend in the number of new applicants is now consistent over three quarters, and because DINA's decision rate has been relatively stable in three successive quarters, the following assumption now form the basis of our projection:

- The number of new applicants after March 1988 might be estimated in the range 7,000 to 12,000. This estimate is based on assumed continuing declines of 30% in successive quarters, a decline which approximates the downward trend over the past year.
- The number of decisions continues at a rate of 5,199, the average rate of the last three quarters.

Based on these assumptions, processing will end somewhere between December 1990 and January 1991.

5. Decisions - Detailed Analysis

a) Decisions: Introduction

Decisions made by DINA fall into three general categories:

- pro ("yes") decisions either to reinstate an applicant or to register an applicant for the first time;
- con ("no") decisions denying an applicant status.
- confirmations: Some applicants turn out to be individuals who have status already. Presumably they believe themselves not to have status and therefore apply; others are people whose status was incorrectly removed pre-1985 and were therefore entitled to status before Bill C-31. In such cases DINA "confirms" the applicant's status.

As reported by DINA in their summaries, denials are grouped together with two other categories "referred to other section" and "duplicate". The first of these residual categories, "referred to other section", involves a small number of applicants (298 on March 31, 1988) "referred to entitlement or adoption sections" for action. Because the number is small, in the analysis below they have been left in the "con" category.

Duplicates are a distinct case: the applicants are not denied status, rather they are for some reason showing up twice as applicants. DINA presumably includes them in their "Denied et al" category to indicate that one of each duplicate has been (conclusively) "removed" from processing. It seems generally inappropriate to include duplicates as decisions "con". They are not denials from the applicant's viewpoint. They are, therefore, removed from the "con" category in the analysis below, and examined separately in section 5.4 below.

b) Distribution of Decisions over Three Main Categories

Table 4 shows the distribution of decisions (duplicates removed) over the three main decision categories in each of the eight reporting periods. As of March 31, 1988, 81% of decisions had been to grant status, 13% to deny status and 6%

to confirm a pre-existing status. However, the distribution of decisions, over the three categories, changed in the twelve months preceding March 31, 1988, that is in the 8th, 9th, 10th and 11th quarters.

TABLE 4: Distribution of Decisions over Three Main Categories / 8 Periods

	Decision							
	Pro	%	Con	%	Confirmed	%	Total	%
Up to 30/6/86	8449	86%	799	8%	611	6%	9859	100%
(Average per Qtr up to 30/6/86)	(2112)	86%	(200)	8%	(153)	6%	2465	100%
July – Sept / 86	1464	86%	155	9%	91	5%	1710	100%
Oct – Dec / 86	2536	86%	207	7%	198	7%	2941	100%
Jan – Mar / 87	8198	84%	1011	10%	551	6%	9760	100%
Apr – June / 87	6339	78%	1370	17%	454	5%	8163	100%
July – Sept / 87	3338	76%	850	19%	216	5%	4404	100%
Oct – Dec / 87	3291	75%	854	20%	229	5%	4374	100%
Jan – Mar / 88	3721	75%	1025	20%	237	5%	4983	100%
TOTAL	37336	81%	6271	13%	2587	6%	46194	100%

Prior to the 8th quarter, 86% of decisions made were favourable, 8% were denials, and 6% were confirmations. These percentages had been stable in each of the four reporting periods from July 1985 to March 1987. In contrast, in the 8th quarter, the percentage of denials increased to 17% of decisions, while the number of favourable decisions fell to 78%. The percentage of confirmations remained roughly the same at 5%.

The upward trend in the percentage of denials continued in the 9th and 10th quarters when denials were 19% and 20% respectively, and remained at 20% in the 11th quarter. Over the entire time series, denials as a percentage of decisions made, have risen substantially from 8% in the first year to 20% in the most recent quarter.

c) Registrations and Restorations

DINA reports decisions pro in two general categories, restorations and registrations. The distribution of decisions in these two general categories over the six reporting periods is shown in Table 5 below. (More detailed breakdowns within each of these categories are given in Tables 7 and 8, following pages.)

TABLE 5: Restorations and Regulations / 8 Periods

	Restorations		Registrations		Total	
	No.	%	No.	%	No.	%
Up to 30/6/86	3513	42%	4936	58%	8449	100%
(Average per Qtr up to 30/6/86)	(878)	(42%)	(1234)	(58%)	(2112)	(100%)
July – Sept / 86	553	38%	910	62%	1463	100%
Oct – Dec / 86	1035	41%	1502	59%	2537	100%
Jan – Mar / 87	3113	38%	5085	62%	8198	100%
Apr – June / 87	1835	29%	4504	71%	6339	100%
July – Sept / 87	860	26%	2478	74%	3338	100%
Oct – Dec / 87	770	23%	2521	77%	3291	100%
Jan – Mar / 88	835	22%	2886	78%	3721	100%
TOTAL	12514	34%	24822	66%	37336	100%

Up to March 31, 1988 there were 12,514 restorations. Thus 34% of the total 37,336 decisions favourable were restorations. There were 24,822 registrations, 66% of the total of favourable decisions.

However, restorations and registrations as percentages of total favourable decisions also showed a change beginning in the 8th quarter. Prior to the 8th quarter the percentages of restorations and registrations had been relatively stable. Restorations had consistently been in the 38 to 42% range and registrations between 58 and 62%. For the 8th quarter the percentage of restorations fell to 29% while the percentage of registrations rose to 71%. Restorations as a percentage of total favourable decisions continued to decline in the next three quarters: 26% in the 9th, 23% in the 10th, and 22% in the 11th, most recent quarter.

d) Identification of Duplicate Applications

Table 6 shows the number of duplicates identified in each reporting period. Again, the 8th quarter, when there was a sharp increase in identification of duplicate applications, marks a break in the time series. Up to and inclusive of the 7th quarter, duplicates were being identified at the average rate of 143 per quarter. In contrast, in the 8th quarter 803 duplicates were identified, in the 9th quarter 529, and in the 10th quarter 912. However, identification of duplicates was low (396) in the most recent quarter.

TABLE 6: Identification of Duplicates / 8 Periods

	Number Identified
Up to 30/6/86	531
(Average per Qtr up to 30/6/86)	(133)
July – Sept / 86	313
Oct – Dec / 86	32
Jan – Mar / 87	130
Apr – June / 87	803
July – Sept / 87	529
Oct – Dec / 87	912
Jan – Mar / 88	396
TOTAL	3646

e) Explaining the Change in Decisions in the 8th, 9th, 10th and 11th Quarters

In our view, the most likely explanation for the findings displayed in Tables 4, 5 and 6 is an increased concentration of decision-making on applicants who are descendents of the women who originally lost status. For some reason, the proportion of not-decided applicants who are women who actually lost status is decreasing. The not-decided pool is increasingly comprised of their first generation descendents (their children, who qualify as registrations not restorations) and their second and third generation descendents (their grandchildren and possibly their great grandchildren, who typically are ineligible.)

The increased rate of identification of duplicates may also be consistent with this. For example, duplicates may typically be children who are included on the applications of more than one adult. The increased rate of duplicate identification would then again point to a disproportionate representation of first, second and third generation descendents in the pool of yet to be decided applicants.

Explanations of why the not-decided pool increasingly comprises these descendents are speculative without further information on how DINA has been processing applications. One or more of the following might explain what appears to be occurring:

- DINA may have been deliberately concentrating on applicants who lost status. Such cases are presumably decided from DINA's own records and are thus administratively somewhat easier to process.
- Because the applications of people who lost status are administratively simpler, such applications may progress at a faster rate. This process of natural selection would then leave a pool of undecided applicants who are disproportionately first, second and third generation.

- Applicants applying later in the process may be disproportionately first, second and third generation. For example, applicants who have received favourable decisions may be encouraging their descendents to apply.

f) Restorations by Bill C-31 Section

DINA reports decisions pro, both restorations and registrations, by the subsection in Bill C-31 under which the decision is made. Table 7 shows the breakdown for restorations.

As might be expected, 77% of restorations (9,600 of 12,514) to March 31, 1988 were women who lost status through marriage to a non-Indian (Section 12(1)B). Enfranchisement was the second largest category accounting for 16% (1,953) of restorations, and the third largest category involved restorations under Section 109(2), children taken off the register as a result of their mother's marriage to a non-Indian (5% or 684). The remaining three categories accounted for only 2% of restorations.

TABLE 7: Restorations by Bill C-31 Section / 8 Periods

	BILL C-31 SECTION AND REASON FOR ORIGINAL LOSS OF STATUS													
	12(1) B Marriage to non-Indian		109(2) Child removed because mother married non-Indian		12(1) (A) IV Double mother clause*		12(2) Illegitimate children of Indian women		109(1) En- franchise- ments		11(E) Unexplained **		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Up to 30/6/86	2890	82%	163	5%	3	0%	43	1%	414	12%	0	0%	3513	100%
July – Sept / 86	425	77%	25	5%	0	0%	20	4%	83	15%	0	0%	553	100%
Oct – Dec / 86	873	84%	41	4%	0	0%	8	1%	113	12%	0	0%	1035	100%
Jan – Mar / 87	2421	78%	170	5%	2	0%	29	1%	483	16%	8	0%	3113	100%
Apr – June / 87	1296	71%	117	6%	6	0%	30	2%	356	19%	30	2%	1835	100%
July – Sept / 87	574	67%	54	6%	3	0%	19	2%	189	22%	21	2%	860	100%
Oct – Dec / 87	535	69%	53	7%	1	0%	24	3%	152	20%	5	1%	770	100%
Jan – Mar / 88	586	70%	61	7%	0	0%	11	1%	163	20%	14	2%	835	100%
Total	9600	77%	684	5%	15	0%	184	1%	1953	16%	78	1%	12514	100%

* Mother was non-Indian, and father's mother was non-Indian so that applicant lost status at age 21.

**DIAND added this category in the first quarter of 1987.

Again there has been a change in the pattern of decisions over time. During the first seven quarters, 80% of restorations had been under section 12(1)B. Thus 80% of those restored in the first seven quarters were women who had lost status because of their marriage to a non-Indian. In the 8th quarter, the percentage of restorations in this category was lower at 71%, and has remained at similar levels in the 9th, 10th, and 11th quarters: 67%, 69% and 70% respectively. Thus, again the evidence suggests that the not-decided applicant pool contains a smaller proportion of the original women who lost status through marriage than were in this pool in the first year and three-quarters.

g) First-Time Registrations by Bill C-31 Section

Table 8 shows the sections under which first-time registrants have been granted status in each reporting period up to March 31, 1988. These registrations are predominantly under section 6(2) and are of children with only one parent entitled under section 6(1). To date, 86% of registrations (21,394 of a total of 24,822) have been in this category.

TABLE 8: First Time Registrations by Bill C-31 Section / 8 Periods

	BILL C-31 SECTION AND REASON FOR REGISTRATION											
	6(1)(F) Both parents entitled under 6(1) or 6(1) and 6(2).		6(2) One parent only entitled under 6(1)		6(1)(F) Both parents entitled under 6(2)		6(1)A Other Registrants		6(1) (C) Unexplained*		Total	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Up to 30/6/86	295	6%	4523	92%	18	0%	100	2%	0	0%	4936	100%
July – Sept / 86	63	7%	820	90%	0	0%	27	3%	0	0%	910	100%
Oct – Dec / 86	77	5%	1391	93%	3	0%	31	22%	0	0%	1502	100%
Jan – Mar / 87	347	7%	4395	86%	61	1%	107	2%	175	3%	5085	100%
Apr – June / 87	337	8%	3751	83%	57	1%	161	4%	198	4%	4504	100%
July – Sept / 87	179	7%	2051	83%	52	2%	103	4%	93	4%	2478	100%
Oct – Dec / 87	233	9%	1984	79%	48	2%	168	7%	88	3%	2521	100%
Jan – Mar / 88	185	6%	2479	86%	55	2%	112	4%	55	2%	2886	100%
Total	1716	7%	21394	86%	294	1%	809	3%	609	3%	24822	100%

* Category added to "S3" reports in first quarter of 1987.

Inspection of the time series of registrations is complicated by the fifth column ("6(1)(C) Unexplained" in Table 8). This column was added by DINA in the 7th quarter. Its addition may help account for the decrease in the percentage of registrations recorded under 6(2) (column 2) in the 7th quarter. Prior to this quarter 90% or more of registrations had been under 6(2). In the 7th quarter 86%

of registrations were under 6(2), but an additional 3% were shown in the newly introduced category 6(1)(C).

However, the 8th and 9th quarters showed lower percentages yet under 6(2) (83% in both quarters), and the 10th quarter showed a further decrease to 79%. Registrations made under 6(1)(C) were insufficient to account for all of the difference between these and preceding quarters. Thus, there is evidence for a change in the pattern of registrations in the 8th, 9th, and 10th quarters.

However, the 12th, most recent, quarter shows an upturn in registrations under 6(2) to 86%.

h) Decisions Pro: Adults and Minors

DINA's "S3" report gives aggregate information on decisions 'pro' for both adults and minors. Consistent with the criteria for registration established by Bill C-31, adult applicants are more likely to receive status than are minors.

Based on Table 1, we know that adults constitute 54% of applicants, minors 46%. If we take those granted status to March 1988 and focus only on restorations and registrations (removing 'confirmations') adults are 68% of those registered and minors 32%. For each adult applicant there are .86 child applicants. For each adult registrant there are .47 children registered. Thus, children are being denied status more frequently than adults. These ratios are, generally, stable in each reporting period. (Table not shown.)

i) Decisions Con: Disallowment Types

In addition to DINA's S3 report, four copies of a second report titled "Reinstatement of Status - Disallowment Types" were also available. These reports covered the period up to and inclusive of March 1987, September 1987, and March 1988.

DINA's summary of disallowments shows that 91% (5,435 of 5,993) had been for applicants with only one parent eligible under Section 6(2) and the other parent, non-Indian. In sum, 91% of denials are to the grandchildren of people who lost status. (Table not shown.)