

“Is This Not Enough?": Asymmetries in Institutional Accountability and Collective Sensemaking in the Case of Canada’s Algorithmic Visa Triage System

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This paper examines how algorithmic accountability in Canada’s visa system is articulated institutionally and experienced by applicants across borders. We analyzed Immigration, Refugees and Citizenship Canada (IRCC)’s Algorithmic Impact Assessment (AIA) for the temporary resident visa (TRV) triage system using the algorithmic decision-making adapted for the public sector (ADMAPS) framework and analyzed Reddit discussions among applicants using a mixed-methods approach. We show that while institutional artifacts emphasize transparency, procedural safeguards, and bounded impacts, applicants engage in collective sensemaking to interpret opaque decisions, often relying on peer knowledge amid uncertainty. We identify three asymmetries between how institutional accountability is structured and how people perceive the process: epistemic asymmetry in access to decision logic, jurisdictional asymmetry in exposure shaped by geopolitical positioning, and temporal-relational asymmetry in how waiting and uncertainty are experienced. We emphasize why it is important to shift attention from institutional design to the uneven distribution of experiences with public-sector algorithmic governance. Together, these contributions demonstrate how algorithmic governance systems in the context of transnational migration produce structured asymmetries not captured by institutional disclosure frameworks, and how extending ADMAPS can account for those uneven translations of accountability.

CCS Concepts: • **Human-centered computing** → **Empirical studies in collaborative and social computing**.

Additional Key Words and Phrases: Algorithmic Impact Assessment, Canada, Immigration, Visa, Accountability

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1 Introduction

Immigration, Refugees and Citizenship Canada has been using a tool known as Chinook since 2018 to rapidly process visa applications by summarizing complex files into simplified views, allowing decisions to be made much more quickly [76]. Immigration lawyers and advocates raised concerns that this efficiency could come at the cost of fairness, as officers sometimes relied on condensed

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50 information rather than full application reviews, citing the use of standardized refusal templates and
51 generic reasoning, which made decisions appear “very generic” and disconnected from applicants’
52 submitted evidence [42]. IRCC maintains that Chinook is not an AI system but rather a Microsoft
53 Excel-based tool that does not make decisions itself [56]. However, the lack of transparency in
54 its decision-making processes has fueled ongoing debate about accountability in immigration
55 processing [17]. IRCC has also deployed the Advanced Analytics Triage of Overseas Temporary
56 Resident Visa (TRV) Applications, a distinct system that algorithmically triages applications by risk
57 level to prioritize processing, thereby shaping how applications enter and are subsequently handled.
58 Public controversies surrounding immigration technologies, such as the one regarding Chinook,
59 highlight persistent tensions between institutional claims of transparency and applicants’ ability to
60 understand and navigate these systems. As public institutions increasingly deploy algorithmically
61 supported decision-making [49, 66, 69], the computing scholarship on sustainable societies should
62 examine social perception around algorithmic governance systems.

63 In Canada, the Directive on Automated Decision-Making (ADM) [55] and the Algorithmic Impact
64 Assessment (AIA) [59] are intended to make such systems legible and accountable to external
65 audiences. While governance frameworks proposed and practiced by such entities promise trans-
66 parency, accountability, and procedural fairness [53], these are largely driven by institutional,
67 technical, or policy-level perspectives, including audits, documentation frameworks, and impact
68 assessments [30, 45, 82]. These approaches conceptualize accountability in terms of traceability,
69 disclosure, and procedural safeguards, often assuming that increased transparency leads to im-
70 proved understanding and oversight [38]. However, there is limited empirical work examining
71 how institutional accountability artifacts relate to the lived experiences of individuals who are
72 subject to and navigate these systems. This gap becomes particularly pronounced in transnational
73 domains, such as immigration, where institutional logics are uneven, and decisions carry significant
74 consequences. To address this gap, we adopt a comparative perspective that reads institutional
75 accountability alongside applicant experience.

76 If accountability is articulated through structured disclosure about algorithms but experienced
77 through partial visibility around evaluative criteria, then interpretability must be reconstructed
78 in practice [3, 80]. In such contexts, collective sensemaking emerges as a necessary response to
79 algorithmic opacity [47, 83]. We examine this through a case study of IRCC’s automated triage
80 system for TRV applications. We analyze two complementary data sources: (1) IRCC’s Algorithmic
81 Impact Assessment (AIA) and a National Research Council (NRC) peer review, which together
82 articulate institutional accountability and system design, and (2) a corpus of Reddit discussions,
83 which capture applicants’ accounts of navigating the visa process. We map institutional artifacts
84 onto the algorithmic decision-making adapted for the public sector (ADMAPS) framework to
85 analyze how accountability is structured across bureaucratic processes, human discretion, and
86 algorithmic decision-making, and we conduct a mixed-methods analysis of Reddit discussions to
87 examine how applicants interpret and respond to system outcomes. This enables us to identify points
88 of alignment and divergence between institutional articulation and experiential interpretation.

89 Our findings reveal three interrelated asymmetries. First, an *epistemic asymmetry*, in which
90 institutional claims of transparency and interpretability do not translate into accessible under-
91 standing for applicants, who instead reconstruct decision logic through peer exchange. Second, a
92 *jurisdictional asymmetry*, in which applicants’ experiences are shaped by their positioning within
93 transnational mobility regimes, despite institutional framing of uniform procedural governance.
94 Third, a *temporal-relational asymmetry*, in which waiting and delay function as consequential
95 forms of exposure that are not adequately captured in institutional impact assessments. Taken
96 together, these findings highlight a limitation in existing frameworks around ADM in the public
97 sector and motivate an extension of ADMAPS to account for transnational contexts.

98

2 Literature Review

This section examines algorithmic governance as an administrative and sociotechnical phenomenon, tracing how institutional mechanisms for transparency and accountability are structured, limited in practice, and subsequently reinterpreted through collective sensemaking. We then situate these dynamics within immigration and visa processing—contexts that are inherently transnational.

2.1 Public-Sector Algorithmic Governance as Administrative Experience

Algorithmic decision-making systems have become increasingly embedded within public-sector governance, where they are used to allocate resources, assess eligibility, detect risk, and triage applications across domains such as social services, policing, healthcare, and immigration [4, 26, 88]. In these contexts, algorithmic systems do not operate as standalone technical tools but as components of broader administrative infrastructures, shaping how decisions are made, how cases are processed, and how individuals are classified and acted upon [65]. As such, public-sector algorithmic systems are best understood as sociotechnical arrangements that redistribute decision-making across bureaucratic procedures, human discretion, and computational processes [70].

A growing body of work has examined how these systems transform governance by reconfiguring authority, responsibility, and accountability within administrative institutions [1]. Rather than eliminating discretion, algorithmic systems often shift it across actors and stages, embedding decision-making within data pipelines, classification schemes, and organizational routines [16, 21]. These shifts can obscure lines of responsibility and complicate oversight, particularly when decision-making is distributed across multiple actors [19, 39]. In the public sector, legal mandates, policy instruments, and institutional constraints often seek to formalize fairness, accountability, and transparency through procedural requirements. For instance, Canada's Algorithmic Impact Assessment (AIA) evaluates algorithmic systems through a structured questionnaire composed largely of predefined and often binary or scalar prompts [59], such as whether a system influences access to rights or services, relies on sensitive personal data, produces legally or materially significant outcomes, or incorporates human oversight and recourse mechanisms. Responses are assigned weighted scores and aggregated into impact levels (I–IV), which in turn determine the scope of required governance interventions. Encoding assumptions about risks, these categories shape what aspects of algorithmic systems become visible or actionable within institutional processes.

Foundational work on classification systems and bureaucratic infrastructures demonstrates how seemingly neutral processes organize social life by categorizing individuals, standardizing information, and structuring access to resources and rights [12, 14]. Hence, administrative systems are not only sites of institutional decision-making but also lived infrastructures that shape how individuals experience governance in practice [13, 41]. The recent adoption of algorithmic decision-making in governance produces further experiences of uncertainty and opacity, particularly for populations subject to eligibility assessments, risk scoring, or discretionary review [26, 66, 67].

While governance frameworks seek to institutionalize accountability through structured disclosure [23, 64, 72], less attention has been paid to how these mechanisms are encountered and interpreted by those subject to automated decisions in practice [75, 81]. A key dimension of this experience is temporal [78]: administrative processes are often structured through waiting, delay, and asynchronous decision-making, which shape how individuals plan, anticipate, and respond to institutional outcomes. Empirical studies worldwide have highlighted how these temporal dynamics are frequently intertwined with relational consequences, as administrative decisions affect not only individuals but also their families, livelihoods, and mobility trajectories [5, 34, 73]. In the Canadian context, public-sector adoption of algorithmic systems across domains such as employment services, border management, and immigration further underscores how automated decision-making has

148 become embedded within administrative governance [58]. Hence, computing scholarship needs
149 to examine how algorithmic decision-making in such high-stakes administrative contexts, where
150 decisions have significant implications for individuals' rights, status, and life opportunities, is
151 experienced by those subject to them and relate to formal accountability mechanisms.
152

153 **2.2 From Institutional Transparency to Collective Sensemaking Under Opacity**

154 Within policy and technical domains, accountability is often framed as the ability to trace, justify,
155 and assign responsibility for decisions and their outcomes [11, 85], while transparency is under-
156 stood as the provision of information that enables explanation, documentation, or disclosure of
157 system properties [7]. Governance instruments such as AIAs, documentation frameworks, audit
158 mechanisms, and public reporting infrastructures aim to exercise those principles and render
159 algorithmic systems more legible to regulators, practitioners, and affected populations [28, 46, 74].
160

161 However, a growing body of scholarship has critically examined the limits of these approaches,
162 arguing that transparency and accountability are not merely technical properties but sociotechnical
163 practices shaped by institutional logics, organizational constraints, and power relations [3, 72, 77].
164 From this perspective, disclosure does not straightforwardly translate into understanding. Instead, it
165 is mediated by decisions about what information is made visible, how it is structured, and for whom
166 it is intended. As a result, transparency initiatives often produce forms of legibility that are oriented
167 toward institutional actors, such as auditors, regulators, and technical experts, while remaining
168 inaccessible or insufficient for those directly affected by algorithmic decisions [27, 54]. Documenta-
169 tion frameworks, reporting templates, and assessment instruments encode assumptions about risk,
170 responsibility, and appropriate forms of evidence, thereby delimiting which aspects of a system are
171 considered relevant for evaluation and which remain unarticulated [29, 37, 62]. In public-sector
172 contexts, structured disclosure mechanisms such as AI registers and impact assessments standardize
173 how institutions report on algorithmic systems, often privileging completeness, consistency, and
174 machine-readability over contextual detail or interpretive openness [36, 79]. Consequently, these
175 mechanisms can create an appearance of accountability while leaving significant gaps in how
176 decisions are understood and contested in practice [31].

177 These limitations are particularly consequential for individuals subject to algorithmic decision-
178 making, who must interpret outcomes without access to the underlying decision logic. In such
179 contexts, users often engage in collective sensemaking practices to reconstruct how systems
180 operate [15, 83]. Studies of everyday interactions with algorithmic systems have shown how
181 individuals develop "folk theories" of algorithms—informal, experience-based models that people
182 construct to explain how algorithmic systems function, make decisions, and respond to user
183 behavior [63, 87]. These folk theories are not necessarily accurate representations of system logic;
184 rather, they are shaped by partial information, prior beliefs, and socially shared interpretations [22,
185 25]. Through online forums and peer exchanges, individuals draw on others' experiences, compare
186 outcomes, and iteratively refine these interpretations. Rather than relying on formal documentation,
187 these practices produce situated, collectively negotiated understandings that approximate decision
188 criteria through comparison, speculation, and inference.

189 Collective sensemaking thus emerges not as a peripheral phenomenon, but as a necessary
190 response to the limits of institutional transparency [24, 63]. When accountability mechanisms fail
191 to provide actionable interpretability, affected individuals turn to distributed forms of knowledge
192 production to make sense of decisions, anticipate outcomes, and guide action [83, 84]. In this
193 process, algorithmic folk theories function as provisional epistemic frameworks that bridge the
194 gap between institutional disclosures and lived experience, enabling individuals to act under
195 conditions of uncertainty despite incomplete or opaque information [3, 15, 22]. These practices
196

197 are particularly salient in administrative contexts, where decisions are consequential yet opaque,
198 requiring individuals to navigate systems whose evaluative criteria are only partially visible.

200 **2.3 Algorithmic Governance in Immigration and Visa Processing Systems**

201 Across jurisdictions, algorithmic decision-making has been increasingly adopted in immigration
202 processes, including visa triage, risk assessment, fraud detection, and eligibility determination [48,
203 88]. These systems operate in high-stakes contexts where decisions directly affect individuals' legal
204 status, mobility, and access to rights and opportunities [73]. However, scholars have raised concerns
205 about their bias and discrimination, procedural fairness, and opacity, especially highlighting how
206 applicants may struggle to understand, contest, or seek redress for decisions that shape their
207 life trajectories [60]. The legal recourse for these applicants becomes more complicated due to
208 the inherently transnational nature of immigration governance. Immigration systems evaluate
209 individuals across national boundaries, incorporating factors such as nationality, travel history, and
210 geopolitical context into decision-making processes [10]. As a result, identical formal rules may
211 produce uneven outcomes depending on applicants' positionality within global mobility regimes.
212 Since these broader geopolitical and socio-economic structures are difficult to capture within formal
213 governance frameworks [40], these dynamics complicate traditional notions of accountability, and
214 algorithmic systems in such contexts can reinforce existing inequalities [9].

215 In the Canadian immigration system, IRCC has deployed automated decision-support tools across
216 multiple immigration streams, including systems for triaging TRV applications. It has used AIA as a
217 mandatory ex-ante assessment tool [59] and has published the AIA report, along with the National
218 Research Council (NRC)'s peer review, through the Government of Canada's Open Government
219 Portal [35, 53]. These are intended to function as disclosure mechanisms that make algorithmic
220 systems more transparent and accountable to external audiences. Studies have shown that such
221 impact assessments may rely on predefined categories of risk that do not fully capture the lived
222 experiences of affected populations, and that their structured, often closed-ended formats can limit
223 the extent to which contextual details about system operation and impact are documented [45, 71].
224 These critiques suggest that while AIAs play an important role in institutionalizing accountability
225 practices, they may not fully reflect how algorithmic systems function in practice or how their
226 impacts are experienced.

227 Emerging work in human-computer interaction (HCI) and computer-supported cooperative
228 work (CSCW) further demonstrates how immigration systems are encountered through digital and
229 algorithmic interfaces that mediate access to information, shape user experience, and reproduce
230 structural inequalities. Studies of government-issued platforms, such as the US Citizenship and
231 Immigration Services website, show how interface design, language choices, and navigation struc-
232 tures can reflect institutional priorities while creating barriers for diverse immigrant populations,
233 including multilingual users and those with limited familiarity with bureaucratic systems [18].
234 These interfaces often serve as critical points of interaction where migrants must interpret complex
235 legal and procedural information under uncertainty, with design choices shaping how rights, obli-
236 gations, and possible actions are understood. Williams and Schoenebeck aptly conceptualized these
237 systems as "digital border walls" [86], where interactions with online platforms become integral to
238 the experience of migration governance, shaping not only access to services but also perceptions of
239 inclusion, exclusion, and institutional legitimacy.

240 Algorithmic and data-driven infrastructures further extend these dynamics by structuring how
241 applications are processed, documents are evaluated, and responses are generated. For instance,
242 automation in immigration workflows, such as document classification and response-generation
243 systems, illustrates how bureaucratic processes are increasingly reorganized around machine-
244 readable categories and templated decision logic, with humans positioned in supervisory roles [50].

246 At the same time, empirical studies of immigration surveillance technologies highlight how mi-
 247 grants experience these systems as opaque, intrusive, and difficult to interpret, often lacking clear
 248 information about how decisions are made or how technologies function [61]. Together, this body
 249 of work underscores that algorithmic migration governance is not only a matter of institutional
 250 design or policy compliance, but also a lived experience shaped by interfaces, infrastructures, and
 251 asymmetries in access to knowledge about how systems operate.

252 Overall, existing scholarship on migration governance has tended to examine governance frame-
 253 works, policy instruments, and system design in isolation, focusing on institutional design, in-
 254 terfaces, and technological infrastructures. However, there is a lack of research examining how
 255 applicants make sense of opaque decision-making processes, how their interpretations align or
 256 diverge from institutional representations, and how these dynamics unfold in transnational admin-
 257 istrative contexts. This paper addresses this gap by analyzing IRCC’s AIA and NRC’s peer-review
 258 reports on the TRV triage system, alongside applicant discourse drawn from online communities.

259 3 Methods

260 We adopt a comparative analytic design that treats (1) IRCC’s AIA reports for its automated TRV
 261 triage system, and (2) a Reddit corpus of discussions on Canadian immigration processes as two
 262 sites through which accountability is articulated (as institutional artifacts) and interpreted (as
 263 applicant discourse). The AIA represents the government’s formal articulation of risk, mitigation,
 264 and accountability regarding automated decision-making for TRV. Reddit discussions, in contrast,
 265 provide downstream accounts of how applicants interpret, reconstruct, and respond to institutional
 266 decisions amid uncertainty, delay, limited transparency, and perceived automation in IRCC pro-
 267 cesses. Pairing these sources enables us to examine how accountability mechanisms articulated in
 268 institutional documentation are translated—and where they break down—in applicants’ experiences.
 269 We analyze these datasets through the lens of ADMAPS [68], which conceptualizes public-sector
 270 algorithmic governance along three dimensions: bureaucratic processes, human discretion, and
 271 algorithmic decision-making. We use it to examine how these dimensions are formally articulated
 272 within IRCC’s institutional documentation, i.e., the AIA report. We then analyze Reddit discussions
 273 to identify experiential dimensions that exceed or complicate this framework. This comparative
 274 approach enables us to identify experiential dimensions underrepresented in existing assessment
 275 instruments and to assess the adequacy of ADMAPS in transnational contexts.

276 3.1 Data Collection and Overview

277
 278 3.1.1 *IRCC Algorithmic Impact Assessment.* We retrieved the AIA report titled *Advanced Analytics*
 279 *Triage of Overseas Temporary Resident Visa Applications* from the Government of Canada’s Open
 280 Government Portal¹. The report is structured as a standardized questionnaire used to evaluate risks
 281 associated with automated decision systems. It contains 65 questions on risks identified within the
 282 project, the system, the algorithm, the automated decision, the impact of the decision, and the data
 283 used, and 41 questions on steps taken to mitigate risk, including consultations with stakeholders
 284 and de-risking and mitigation measures. The assessment produces an overall risk score and a
 285 mitigation score. Although procedurally comprehensive, the document relies predominantly on
 286 closed-ended responses. Only nine of the 65 risk-related questions solicit a long-form explanation.
 287 As such, contextual details regarding system implementation, institutional constraints, or affected
 288 populations are limited within the report itself.

289
 290 3.1.2 *Reddit Corpus.* Reddit is a large-scale online discussion platform organized into user-created
 291 topical communities (“subreddits”), where users create posts and threaded comments. To understand
 292

293 ¹<https://open.canada.ca/data/en/dataset/6cba99b1-ea2c-4f8a-b954-3843ecd3a7f0>

295 applicants' accounts, we constructed a corpus of Reddit discussions from Canadian visa and
 296 immigration-focused subreddits. We selected subreddits based on two criteria: (a) substantial
 297 membership size and sustained activity, and (b) primary topical focus on Canadian immigration or
 298 IRCC processes. Table 1 summarizes the included subreddits and the number of extracted posts.
 299 Smaller communities (e.g., r\CanadaVisa) were included when highly aligned with overseas visa
 300 processes. We collected data on September 23, 2025, using the Python Reddit API Wrapper (PRAW).
 301 Deleted posts, removed comments, and content from banned users were not retrievable at the time
 302 of extraction and are therefore absent from the dataset. This limitation may disproportionately
 303 affect discussions involving sensitive experiences or contested decisions. We treat these discussions
 304 not as representative public opinion, but as situated accounts through which applicants collectively
 305 interpret institutional processes and outcomes.

307 Table 1. Reddit corpus: Immigration-focused subreddits

| Subreddit | Followers | Posts | Discussion Focus |
|---------------------|-----------|-------|---|
| r\immigrationCanada | 254k | 993 | Questions and discussion regarding immigration to Canada |
| r\CanadaImmigrant | 10k | 952 | Experiences related to immigration |
| r\MovingToCanada | 7.8k | 617 | Relocation assistance and advice |
| r\IRCCDiscussion | 1.6k | 463 | IRCC processes and policy updates |
| r\CanadaVisa | 1.1k | 202 | PR, work permit, study permit, and visitor visa discussions |

320 3.2 Data Analysis

321 3.2.1 *Analysis of the IRCC AIA and NRC Peer Review.* We conducted a deductive qualitative analysis
 322 of the IRCC AIA report and the NRC peer review of the TRV triage system. Given the predominance
 323 of binary responses, our analysis focused on how risk is framed, operationalized, and bounded
 324 within the assessment instrument. The first two authors conducted the initial open coding of the
 325 AIA report. Where applicable, we analyzed the binary responses jointly with their accompanying
 326 descriptive fields. This approach allows us to examine both the presence and absence of disclosure
 327 within the assessment document. We then mapped these open codes to the three dimensions of the
 328 ADMAPS framework [68]. The ADMAPS framework further conceptualizes algorithmic governance
 329 as emerging from the interaction of these elements: human discretion, bureaucratic processes,
 330 and algorithmic decision-making. Human discretion encompasses professional expertise, value
 331 judgments, and heuristic reasoning exercised by frontline practitioners; bureaucratic processes
 332 capture organizational conditions such as resources and constraints, administrative routines and
 333 training, and governing laws and policies; and algorithmic decision-making attends to the role of
 334 data, the form of decision support (e.g., predictive or prescriptive), and the degree of uncertainty
 335 embedded in these systems. The codes were revised, and their mappings were consolidated and
 336 finalized through discussions with the two supervising authors. This structured approach enables
 337 us to assess which dimensions are foregrounded and which are minimized in the assessment
 338 instrument.

340 3.2.2 *Analysis of Reddit Discussions.* We used a mixed-methods approach in which computational
 341 clustering supported the identification of recurring discussion patterns, followed by in-depth
 342 qualitative analysis [20] to interpret their meaning in relation to institutional processes. Such
 343

344 methodological combinations are widely adopted in social computing research to balance large-
345 scale pattern detection with interpretive rigor [8, 51].

346 First, we used BERTopic [32] to identify recurring themes across Reddit threads. We generated
347 embeddings for the collected Reddit posts using the Qwen-3 language model [6]. The resulting
348 1024-dimensional embeddings were reduced using UMAP [44] to preserve local semantic structure
349 prior to clustering. We selected HDBSCAN to generate clusters due to its robustness to variable
350 cluster densities [43]. We selected the hyperparameters through grid search, prioritizing topic
351 diversity and minimizing the proportion of posts classified as noise. Automatically generated topic
352 representations were treated as intermediate outputs rather than final analytic categories.

353 Next, the first two authors manually reviewed, merged, and interpreted clusters to ensure
354 internal coherence and substantive interpretability. During this phase, we paid particular attention
355 to identifying clusters that surfaced experiential dimensions not directly captured in the IRCC
356 AIA reports or readily mappable onto the three ADMAPS dimensions. Then, we conducted an in-
357 depth qualitative analysis of posts within those clusters. Following the grounded-theory approach,
358 first, we generated open codes by identifying frequent topics, intents, and processes mentioned
359 in the posts. Examples of open codes included “guessing approval thresholds,” “comparing visa
360 offices,” and “knowing about others’ timelines.” These open codes were subsequently grouped into
361 axial codes by identifying conceptual relationships among them. For example, open codes such as
362 “guessing approval thresholds” and “asking how much funds are enough” were merged into the axial
363 category “inferring hidden decision criteria.” Finally, axial codes were consolidated into higher-level
364 selective codes that captured broader structural patterns across discussions. For instance, axial
365 codes related to inferring hidden criteria, nationality-based speculation, and collective information
366 pooling were integrated into the selective code “epistemic asymmetry,” reflecting unequal access
367 to institutional decision logic. The supervising authors were involved throughout the coding
368 process, providing analytic feedback and helping resolve disagreements to ensure interpretive
369 rigor. We conceptualized the unifying pattern in the selective codes as “transnational asymmetry,”
370 which, when read alongside the institutional analysis, informed our identification of epistemic,
371 jurisdictional, and temporal–relational asymmetries.

372 4 Results

373 We structure our results to examine how accountability in automated visa triage is articulated,
374 translated, and experienced across institutional and applicant contexts. We first analyze IRCC’s
375 AIA report and NRC peer review to understand how automation is framed within bureaucratic
376 and technical governance. We then examine Reddit discussions as downstream sites of applicant
377 sensemaking, where individuals collectively interpret and respond to system outcomes. Reading
378 these together reveals systematic asymmetries between institutional accountability mechanisms
379 and their experiential uptake. Thus, rather than treating Reddit discussions as a standalone social
380 computing phenomenon, we analyze them as downstream sites where applicants collectively
381 interpret and compensate for institutional opacity.

382 4.1 Institutional Artifacts Mapped to ADMAPS

383 We map two institutional artifacts: (1) IRCC’s AIA for the TRV triage system and (2) the NRC peer
384 review of that system, onto ADMAPS’s three dimensions: bureaucratic processes, human discretion,
385 and algorithmic decision-making [68], to examine how institutional documentation articulates
386 discretion, organizational practice, and model operation in relation to automated visa triage.

387 *4.1.1 Bureaucratic Processes.* The AIA operationalizes bureaucratic process through a compliance-
388 oriented questionnaire and mitigation checklist. It assigned an impact level of 2 (Moderate impact)

393 to IRCC’s advanced analytics triage system for TRV applications. This level denotes systems with
394 moderate, reversible impacts on individuals and requires mandatory measures, including peer
395 reviews, consultation records, quarterly reviews, basic bias testing, human override, and recourse
396 processes [59]. The AIA report describes documented processes for bias testing, data quality
397 resolution, Gender-based Analysis (GBA+) analysis [57], audit trails, change logs, access controls,
398 and override logging in the IRCC TRV triaging system, while repeatedly noting that many of these
399 materials are not publicly available. The AIA also mentions internal and external consultations
400 (including academia, the Office of the Privacy Commissioner, and immigration lawyers).

401 The NRC report foregrounds bureaucratic processes through tooling, documentation, and re-
402 producibility practices. It upholds other bureaucratic governance practices, such as routinized
403 maintenance, performance monitoring, and procedural accountability. For example, it notes that
404 modeling and deployment occur within the Statistical Package for Social Sciences (SPSS) software
405 environment, which is described as stable but limited in flexibility. It repeatedly emphasizes doc-
406 umentation and reproducibility, describing the overall approach as “excellent, simple and clear,”
407 and stating that reproducibility risks are minimized through software choice, documentation, and
408 variable justification. It also endorses a three-month retraining cycle for the models and recom-
409 mends monitoring retraining parameters. We discuss the procedural accountability of the IRCC
410 TRV application triage system in the following subsections.

411 *4.1.2 Human Discretion.* The AIA formally retains human discretion in algorithmic decision-
412 making for TRV applications. It states that the system automates only positive eligibility determi-
413 nations and does not refuse applications. All refusals continue to be made by officers, and officers
414 make the final decision on each application. Even in cases with automated positive eligibility
415 determinations, applications are sent to an officer for admissibility screening, and officers may
416 revisit eligibility if they encounter information that affects the determination. The AIA also states
417 that officers will not be aware of the rules used for triage or automated determinations, nor will they
418 receive information about the system’s analysis, thereby insulating human discretion from direct
419 algorithmic influence. To locate the procedural accountability, the NRC review depicts the routing
420 of applications “to the appropriate agents for processing” as a discretionary division of labor rather
421 than wholesale replacement. The NRC peer review primarily evaluates modeling methodology
422 rather than officer decision practices. However, it emphasizes organizational risks rooted in human
423 factors (e.g., legal, public perception, security) alongside performance goals, highlighting that
424 professional judgment and institutional priorities shape the deployment of automation.
425

426 *4.1.3 Algorithmic Decision-Making.* The AIA characterizes the system as sorting applications into
427 tiers based on complexity and automating certain positive eligibility determinations. It states that
428 the system uses personal information and draws from multiple data sources, and it reports that the
429 algorithmic process is not difficult to interpret or explain. However, the AIA provides limited detail
430 on what features are used, how complexity tiers are operationalized, or how routing decisions affect
431 processing outcomes. We see a similar mismatch in impact assessment. While the triaging system
432 was assigned an overall “moderate” impact score, the AIA assesses its impacts on individuals’ rights
433 and freedoms as “little to no impact” and justifies this by emphasizing triage use, positive-only
434 automation, and alignment with legislative/regulatory requirements.

435 The NRC review complements the AIA report by providing concrete technical details about the
436 model. It identifies the modeling technique as a decision tree and explicitly praises it for transparency.
437 It also explains the training/testing design, class imbalance (refusals as a relatively small class),
438 under-sampling approaches, and validation sampling. The report recommended experimentation
439 with more complex model types (e.g., Random Forest, support vector machine, neural networks).
440 However, IRCC responses further indicate that decision tree-based models were retained due to
441

explainability trade-offs. This positions interpretability and procedural accountability as primary design constraints that shape algorithmic decision-making.

4.2 Reddit Discussions as Structured Applicant Discourse

Whereas institutional artifacts like the AIA and the NRC review describe how accountability in automated TRV triage system is designed, Reddit discussions reveal how accountability is interpreted, reconstructed, and contested in practice. Using BERTopic, we identified 42 clusters after excluding outliers. Figure 1 shows the UMAP projection of posts. Manual inspection of these clusters revealed three of these being directly related to TRV processes: (1) refusal reasons and application strengthening, (2) processing times and delays, and (3) eligibility timing and document strategy. The remaining clusters were centered on other immigration streams (e.g., spousal sponsorship, permanent residence, citizenship applications) or on procedural steps (e.g., biometrics) that cut across multiple visa categories. Because our institutional analysis focuses on the TRV triage system, we limited subsequent qualitative analysis to clusters uniquely associated with TRV applications. Clusters addressing broader immigration categories or cross-cutting procedural requirements were therefore excluded to maintain analytic alignment between institutional artifacts and applicant discourse. Rather than reflecting random discussion, the clusters related to TRV correspond to recurring stages of applicant interaction with the visa system and also organize around recurring uncertainties: how to present an application, how long processing will take, and how eligibility rules will be interpreted in specific circumstances.

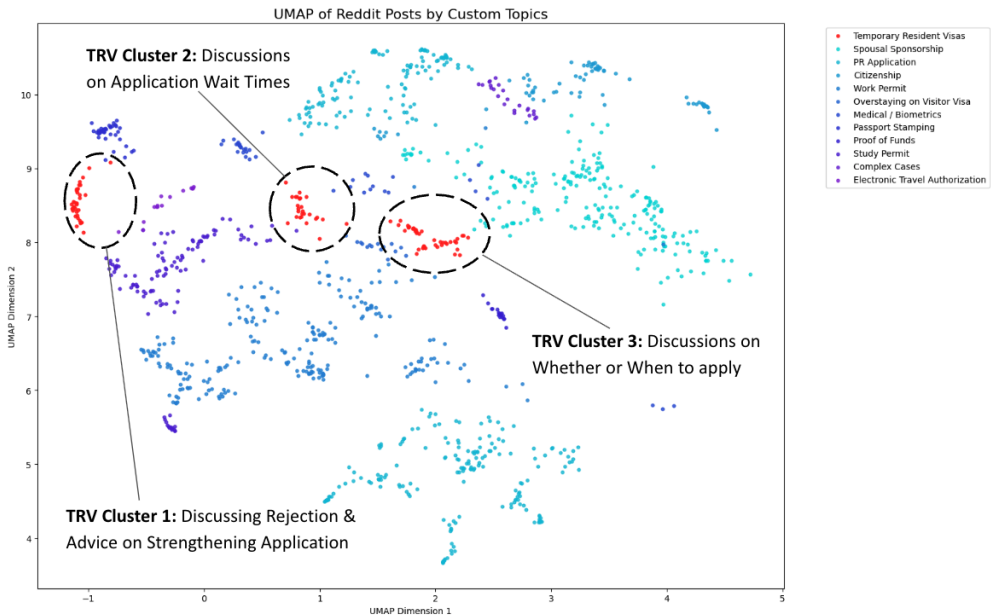


Fig. 1. UMAP projection of Reddit posts using BERTopic embeddings. Three TRV-related clusters are highlighted: Cluster 1 (refusals and strengthening applications), Cluster 2 (processing delays and wait times), and Cluster 3 (eligibility, timing, and documentation strategy).

4.2.1 Cluster 1: Refusal Reasons and Application Strengthening. Cluster 1 centers on speculating reasons for refusal and strategies for strengthening applications. Posts frequently include detailed

491 financial figures, employment documentation, property ownership descriptions, and family ties.
 492 These discussions are structured to evaluate sufficiency with respect to funds, family and social ties,
 493 and documentation. Applicants describe rejection letters citing generic grounds such as insufficient
 494 ties or inadequate financial resources, and then attempt to determine which specific elements were
 495 deficient. For example, a user quoted texts from the received rejection letter their friend received:

496 One friend had to apply for a transit visa for Canada. On the reasons why it says: "I
 497 am not satisfied that you will leave Canada at the end of your stay as required by
 498 paragraph 179(b) of the IRPR². ... I am refusing your application because you have
 499 not established that you will leave Canada, based on the following factors: your
 500 assets and financial situation are insufficient to support the stated purpose of travel."
 501 We are only passing through [two Canadian cities] to [a Japanese city], with about
 502 4 hours of layover. He reported having C\$1500 for the stay in Canada. Is this not
 503 enough? Obviously, he has more money for the entire trip, but the application asked
 504 about the transit.

505 Rather than outright disputing the legitimacy of refusal, posts often seek interpretive clarifica-
 506 tion. Users respond with heuristic advice: demonstrate property ownership, provide employment
 507 leave letters, avoid signaling future immigration intent, and ensure documentation aligns with
 508 the declared duration of stay. The conversational pattern resembles peer-led case review, where
 509 community members approximate institutional evaluation criteria through comparative anecdotes.
 510

511 *4.2.2 Cluster 2: Processing Delays and Temporal Monitoring.* Cluster 2 is structured around uncer-
 512 tainty in waiting and processing. Posts frequently reference official IRCC processing times and
 513 contrast them with personal timelines. Let's consider the following conversation snippet:

514 P1: The processing time has increased from around 210 days to over 390 days. So, I
 515 don't think I'll be hearing back from them anytime soon.

516 P2: The processing time is the average of all applications processed, so I assume it
 517 should be half the wait time for normal visa applications.

518 P3: The processing time has increased to 400 days, so I don't expect to hear back for
 519 another 3 months.

520 P4: I just received it last week. It took 270 days to obtain it.

521 These exchanges reveal a pattern of collective temporal monitoring. Here, the official IRCC
 522 estimate of processing times serves as a benchmark rather than a reliable predictor. Users refer to
 523 the publicly posted processing time and translate it into individualized forecasts. A key rationale
 524 to reinterpret the institutional metric is that it represents an average across all cases and may
 525 not apply uniformly. In this process, actual timelines serve as peer-based counterexamples that
 526 recalibrate others' expectations. Thus, rather than treating the official estimate as determinative,
 527 participants collectively triangulate expected outcomes through comparison, reinterpretation,
 528 and peer testimony. As institutional averages are re-contextualized through experiential data
 529 shared within the community, processing delays are simultaneously reframed as more than mere
 530 administrative inconvenience. Reddit posts regarding TRV applications often reference weddings,
 531 parental visits, academic programs, employment transitions, and travel plans. Consider the following
 532 conversation snippets from various threads:

533 P5: I'm planning to apply for a second permit from outside Canada since I received
 534 a time-sensitive job offer.

535 P6: I applied for my parents' and brother's visitor visas back in January, hoping
 536 they could come stay with me for 2-3 months over the summer. Unfortunately, their
 537

538 ²IRPR = Immigration and Refugee Protection Regulations
 539

540 applications were refused. ... A few months later, I reapplied this time just for my
 541 parents since I found out I was pregnant, and the reason for their visit was no longer
 542 tourism, but their presence and support. ... This happened around the time of the
 543 political tensions, when IRCC was apparently rejecting most visitor visas unless it
 544 was for humanitarian reasons. ... My due date is in November, so I really need their
 545 support, but I'm worried another refusal could affect future chances. My question is:
 546 Should I apply for their super visa³ now, or wait until next year?

547 Applicants' accounts show that TRV decisions are experienced not as discrete administrative
 548 outcomes but as temporally unfolding constraints that shape employment timelines and intimate
 549 family arrangements. As individuals navigate time-sensitive job offers or seek parental support
 550 during pregnancy, waiting and uncertainty become relationally embedded, structuring decisions
 551 across work, care, and mobility. Hence, waiting becomes a structuring condition that shapes life
 552 decisions beyond the application itself. For those affected by an unfavorable decision, the "little
 553 to no" or "moderate" impact assessment of IRCC's TRV triage in the institutional accountability
 554 artifacts does not feel relatable.

555
 556 **4.2.3 Cluster 3: Eligibility, Timing, and Application Strategy.** Cluster 3 focuses on determining
 557 whether and when to apply, especially in complex status situations. Posts frequently involve
 558 overlapping permit types (e.g., study permit, post-graduation work permit (PGWP), visitor visa)
 559 and concerns about document validity. For example, users often asked whether holding a visa from
 560 another country might influence processing speed:

561 What nationality are you? Do you think having a US visa will expedite things?

562 Here, the application strategy itself is treated as a decision variable. Applicants deliberate
 563 over family composition, passport type, visa history, and intended travel duration. The system
 564 is experienced not only as a set of eligibility rules but as an evaluative apparatus sensitive to
 565 contextual signals. A user describes their personal situation as follows:

566 I am an Afghan living in Kuwait. I previously traveled to a couple of countries for
 567 tourism. My recent trips were to the UK and Turkey. I am considering applying for
 568 a TRV to Canada. ... I am married and have kids. Should we all apply together, or
 569 should I apply on my own? How much bank balance should I show?

570 Across clusters, applicants rarely describe directly interacting with the inner algorithms or com-
 571 ponents of algorithmic systems, which were prioritized in the AIA report and NRC review. Instead,
 572 they describe interacting with institutional outcomes, refusals, delays, and routing decisions, whose
 573 internal logic remains partially opaque. While the AIA and NRC reviews emphasize interpretability
 574 and procedural accountability in system design and organizational oversight, these qualities do
 575 not translate into interpretability or transparency for the applicant experience. For applicants, the
 576 system does not appear as a documented decision tree with audit trails and retraining cycles, but
 577 as a sequence of outcomes whose evaluative criteria and temporal dynamics remain unclear.

579 **4.3 Emergent Asymmetries Between Institutional Design and Applicant Experience**

580 Juxtaposing institutional artifacts with applicant discourse reveals not simply differences in per-
 581 spective, but systematic failures in how accountability mechanisms translate across contexts. The
 582 AIA and the NRC review frame automation in TRV application processing as interpretable, pro-
 583 cedurally governed, and bounded in impact through retained discretion in algorithm-supported
 584 and human-in-the-loop decision making, documented procedural safeguards, the interpretability
 585 of modeling techniques, and bounded-impact classifications. In contrast, applicants encounter a
 586

587 ³Super visa is a multi-entry TRV option available for parents and grandparents of Canadian citizens or permanent residents.
 588

589 system whose evaluative logic, spatial positioning, and temporal consequences remain uncertain
590 and uneven, especially around evaluative criteria, spatial positioning, and temporal exposure. These
591 differences do not indicate that the system lacks documentation or oversight. Rather, they reveal
592 asymmetries in the prioritization of interpretability aspects and impact factors across institutional
593 and applicant positions. We identify three interrelated asymmetries: epistemic, jurisdictional, and
594 temporal-relational.

595
596 *4.3.1 Epistemic Asymmetry: Unequal Access to Decision Logic.* Under ADMAPS, algorithmic decision-
597 making is evaluated with respect to model choice, explainability, validation, and reproducibility.
598 While the NRC review and AIA report explicitly praise the TRV triage system for its transparency,
599 interpretability, audit trails, and documentation, interpretability does not manifest as an acces-
600 sible understanding of evaluative criteria in applicant discourse. Instead, applicants attempt to
601 reconstruct thresholds retrospectively. In Cluster 1, users debate whether a certain amount of bank
602 balance is “enough,” whether property ownership sufficiently demonstrates ties to their home coun-
603 tries, and how documentation aligns with the IRPR guidelines. While the AIA explicitly references
604 bias testing in relation to gender (e.g., through GBA+), it does not substantially address how other
605 demographic and socioeconomic attributes, such as nationality and financial solvency, may struc-
606 ture decision-making. In contrast, discussions in Cluster 3 frequently center on whether nationality,
607 prior visa history, or family composition influence approval outcomes. This divergence indicates
608 that applicants perceive demographic positioning as central to fairness and accountability in TRV
609 applications, even where such dimensions are not foregrounded in institutional documentation.

610 The institutionally validated transparency indicators and initiatives, such as model choice,
611 documentation, and retraining, do not eliminate uncertainty at the point of application. In the
612 absence of access to the system’s decision logic, applicants lack the interpretive resources needed
613 to make sense of outcomes—a form of hermeneutical disadvantage. As a result, they approximate
614 evaluative criteria through peer testimony and anecdotal comparison, collectively reconstructing
615 a logic that remains opaque within formal documentation. We describe this gap as an *epistemic*
616 *asymmetry*: interpretability is secured at the level of institutional governance, and applicants
617 construct parallel interpretive practices through peer exchange, yet the system’s authoritative
618 evaluative logic remains structurally out of reach for those who are subject to its decisions. This
619 indicates that existing transparency and explainability mechanisms operate primarily at the level of
620 institutional auditability, rather than supporting meaningful interpretability for affected individuals.

621 *4.3.2 Jurisdictional Asymmetry: Spatial Positioning and Sovereign Exposure.* The AIA and NRC
622 documents treat the system as an institutional mechanism applied consistently within regulatory
623 boundaries. However, applicant discussions reveal sensitivity to geographic and nationality-based
624 positioning. For example, in Cluster 3, users ask whether holding a US visa might “expedite things,”
625 whether passport type or applying from certain visa centers influences processing, and whether
626 applying together or separately alters evaluation. These deliberations reflect an awareness that
627 identical formal rules may produce different outcomes depending on national origin, visa history,
628 or country of application, due to factors such as the volume of TRV applications in that category.

629 Institutionally, algorithmic triage is framed as routing applications by complexity. Experientially,
630 applicants interpret routing and waiting as shaped by geopolitical positioning. While documentation
631 emphasizes uniformity and procedural alignment with legislative criteria, applicants perceive expo-
632 sure to the system as uneven across national contexts. We describe this as *jurisdictional asymmetry*:
633 applicants encounter the system from varied jurisdictional positions that shape their vulnerability
634 to delay, scrutiny, or routing—differences not foregrounded in institutional documentation. As a
635 result, accountability mechanisms grounded in uniform regulatory assumptions fail to account for
636 uneven exposure across transnational populations.

637

638 4.3.3 *Temporal–Relational Asymmetry: Waiting as Distributed Consequence.* The TRV triage system
 639 is characterized as efficiency-enhancing and assistive, with positive eligibility automation intended
 640 to streamline processing. Although the AIA categorizes impacts on rights and freedoms as “little
 641 to no impact” and frames refusals as reversible, Reddit discussions demonstrate that waiting time
 642 functions as a central experiential consequence, revealing a divergence between institutional impact
 643 classification and lived temporal exposure. For example, as posts in Cluster 2 reference weddings,
 644 parental visits, care needs during pregnancy, academic enrollment, employment transitions, and
 645 family reunification, we found that Reddit users often discussed how the temporal uncertainty
 646 of the TRV application processing extends beyond the application itself, shaping relational and
 647 life-planning decisions. We describe this as *temporal–relational asymmetry*: although institutional
 648 impact assessments classify effects as moderate and reversible, applicants experience prolonged
 649 temporal exposure as consequential, deeply entangled with relational commitments, and unevenly
 650 borne across individuals. This suggests that current impact assessments systematically under-
 651 theorize time as a site of harm, particularly in contexts where administrative delays are socially
 652 and relationally consequential.

653 Taken together, these asymmetries reveal a limitation in the ADMAPS framework: while it cap-
 654 tures accountability within institutional boundaries, it does not account for how those mechanisms
 655 are translated, experienced, and redistributed across transnational contexts. We therefore extend
 656 ADMAPS to incorporate this dimension, foregrounding how accountability is not only designed,
 657 but differentially encountered by the populations subject to it.

658 5 Discussion

659 In this section, we first show how accountability is collectively reconstructed under conditions
 660 of opacity, then examine how administrative assessments overlook temporal–relational burdens,
 661 and finally extend these insights to transnational contexts, where accountability is mediated by
 662 applicants’ uneven positioning across borders.

663 5.1 Accountability as Collective Reconstruction Under Opacity

664 Our analysis highlights structural limitations of the AIA as a transparency mechanism. The predom-
 665 inance of binary (yes/no) questions constrains the extent to which institutions can provide detailed,
 666 contextualized explanations of system behavior. As a result, many claims regarding fairness, bias
 667 mitigation, and procedural safeguards remain internally asserted but externally unverifiable. We
 668 found how accountability can be actively reconstructed through collective sensemaking practices
 669 among applicants when it is limited by institutional mechanisms.

670 While accountability recommendations often emphasize documentation and auditability as key
 671 mechanisms for enabling oversight and fairness [11, 23, 46], applicants interacting with the TRV
 672 system do not encounter algorithmic decision-making as documented models or audit trails, but as
 673 opaque outcomes–refusals, delays, and routing decisions–whose underlying logic, often relying on
 674 institutional jargon, remains inaccessible. Thus, the AIA report and the NRC peer review about the
 675 IRCC’s TRV triage system function more as institutional reporting than as mechanisms for enabling
 676 meaningful public understanding. In response, they engage in collective sensemaking practices,
 677 using platforms such as Reddit to reconstruct evaluative criteria through peer comparison, anecdotal
 678 evidence, and heuristic reasoning. These discussions frequently center on common questions (e.g.,
 679 evidence of financial adequacy) in the TRV application and speculate how the responses to those
 680 questions and their representation influence outcomes.

681 These practices reflect attempts to approximate decision logic, develop situated interpretations
 682 and explanations, and lead to various folk theories that guide future applicants in preparing
 683 their TRV applications. As institutional artifacts aimed at accountability and transparency lack
 684

685
686

687 interpretability for general applicants, this increases their reliance on collective sensemaking
688 through online platforms. Applicants with more common or typical cases benefit from shared
689 community knowledge, whereas those with atypical or complex circumstances are less likely to
690 receive useful guidance, resulting in unequal knowledge sharing within the applicant population.
691 Moreover, while these discussions can inform applicants' preparation strategies, they also introduce
692 new dynamics into the system. In the absence of interpretable transparency and accountability
693 measures, attempts to align with perceived decision criteria may encourage strategic presentation
694 or misrepresentation of information, increasing the verification burden on IRCC adjudicators and,
695 in turn, contributing to additional scrutiny and delays for future applicants.

696 **5.2 Administrative Assessment based on Temporal–Relational Exposure**

698 Public-sector algorithmic systems in administrative infrastructures are often justified through
699 efficiency, standardization, and procedural safeguards [66, 68]. Within this framing, systems such
700 as IRCC's automated triage are evaluated in terms of their ability to improve processing efficiency,
701 manage application volumes, and preserve human discretion. While it is characterized as a system
702 with a moderate impact based on the internal assessment score, our findings complicate this view
703 by showing that these systems and their impacts are experienced not merely as administrative
704 tools, but as temporally and relationally distributed processes whose consequences extend beyond
705 institutional boundaries. Particularly, processing time emerges not merely as a technical metric but
706 as a structuring condition shaping applicants' life decisions, events, and opportunities. While the
707 AIA characterizes the triage system as having "moderate" or even minimal impact on individuals'
708 rights and freedoms, applicants experience prolonged waiting and uncertainty as consequential
709 and deeply embedded in their temporal-relational contexts. This reveals how institutional impact
710 classifications fail to account for how time itself functions as a distributed burden.

711 Furthermore, the efficiency gains associated with automated triage are not evenly distributed.
712 Because the system prioritizes "routine" applications for streamlined processing and automated
713 positive determinations, those already positioned as low-risk benefit most from reduced wait times.
714 In contrast, applications requiring additional verification or deemed more complex continue to
715 experience longer delays. As a result, efficiency operates asymmetrically: it accelerates already
716 straightforward cases while offering limited relief for those facing the greatest uncertainty and
717 stakes. This finding extends prior work by showing that administrative efficiency, when mediated
718 through algorithmic triage, can reproduce uneven experiential outcomes. The institutional impact
719 assessment artifacts also do not outline what steps need to be taken to uniformly improve service.

720 **5.3 Transnational Asymmetry in Accountability Across Borders**

722 Algorithmic systems in migration and border governance have been widely critiqued for their impli-
723 cations on mobility, surveillance, and differential access to rights [2, 10, 40]. Applicants frequently
724 speculate about whether uneven geopolitical factors, such as nationality, country of application,
725 or prior travel history, influence processing outcomes. These concerns point to a broader jurisdic-
726 tional asymmetry, in which individuals encounter the same formal system from uneven positions
727 within global mobility regimes. Although institutional documentation emphasizes procedural
728 consistency and standardized criteria [71], applicants perceive their exposure to the system as
729 differentiated—shaped by application volumes, geopolitical relationships, and the perceived risk
730 associated with specific regions. This asymmetry is further reflected in disparities in processing
731 times across countries. While such differences may stem from variations in application complexity,
732 verification procedures, or policy mandates, they are experienced by applicants as uneven access to
733 mobility and opportunity. Importantly, these experiential disparities remain largely backgrounded
734 in institutional accounts, which foreground standardization and alignment with regulatory criteria.

735

Taken together, these findings suggest that existing frameworks for evaluating algorithmic governance—such as ADMAPS—are limited in their ability to account for how systems operate across jurisdictional boundaries. While they effectively capture institutional dimensions such as bureaucratic processes, human discretion, and model design, they do not fully address how these systems are experienced by individuals situated outside the governing state. This limitation points to the need for conceptual frameworks that incorporate transnational dimensions of algorithmic governance, particularly in domains such as immigration, where decisions are inherently cross-border and unevenly distributed.

While the ADMAPS framework effectively captures institutional dimensions of automated governance within organizational boundaries [33, 52, 68], our study demonstrates that when extended to transnational domains such as visa adjudication, these dimensions do not fully account for how systems are experienced by individuals positioned outside the governing state. In such contexts, institutional safeguards within a country do not translate uniformly into meaningful accountability for affected populations in others. Instead, they generate uneven experiential effects across borders, revealing a gap between institutional articulation and lived experience.

To address this limitation, we propose an extension of ADMAPS by introducing a fourth dimension—*transnational asymmetry*—thereby transforming it into Algorithmic Decision-Making for Administrative Transnational Systems (ADMATS) (see Figure 2). This added dimension captures how accountability is differentially produced and experienced across borders, foregrounding the structural conditions under which individuals encounter algorithmic decision-making systems. Empirically, transnational asymmetry comprises three interrelated components:



Fig. 2. A Framework for Algorithmic Decision-Making in Administrative Transnational System (ADMATS). The dimensions of the Algorithmic Decision-Making Adapted for the Public Sector (ADMAPS) framework are shown in black and white. The additional dimension introduced in ADMATS is highlighted in turquoise.

- **Epistemic asymmetry:** Institutional interpretability—such as documented decision rules, audit trails, and validation procedures—does not equate to accessible procedural transparency or accountability for applicants. Despite being familiar with different terminologies, norms, and contexts, they often lack insight into evaluative criteria described and explained differently.
- **Jurisdictional asymmetry:** Although algorithmic triage is framed as uniformly applied, applicants experience differentiated exposure shaped by their geopolitical positioning, regional classification, and perceived risk profiles.

- **Temporal-relational asymmetry:** Institutional impact categorizations do not capture how applicants experience the consequences of decisions in relation to their temporal constraints (e.g., urgency, delays) and relational dependencies (e.g., family, employment, migration trajectories).

ADMATS does not replace ADMAPS; rather, it extends it by incorporating transnational dimensions into the evaluation of administrative algorithmic systems operating across borders. Under ADMAPS alone, systems such as TRV triage may appear procedurally accountable, discretion-preserving, and technically interpretable. ADMATS demonstrates that these properties can coexist with asymmetries in interpretive access, jurisdictional vulnerability, and temporal burden. By incorporating transnational asymmetry as a fourth dimension, ADMATS enables a more comprehensive analysis of how administrative algorithmic systems interface with conditions under which those decisions are understood, contested, and lived by individuals situated across uneven global contexts.

6 Conclusion

Our findings show that existing governance instruments for public-sector AI, such as the AIA, fall short not because of their absence, but because accountability is unevenly interrogated and understood across bureaucratic and experiential contexts. Addressing this requires moving beyond compliance-oriented reporting toward mechanisms that are interpretable and actionable for those affected. Governance instruments and impact evaluations must incorporate the lived experiences of applicants, particularly those in intersectional institutional jurisdictions, to surface epistemic and structural asymmetries that current processes overlook. Public institutions' claims about fairness and impact must be both accurate and perceived as meaningful by the publics they govern. Taken together, these shifts reframe algorithmic accountability as not only a matter of institutional structure and procedure, but of how accountability is contextually experienced and distributed.

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