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## OAA Parallel Processing Plan (PPP)

Procedure Reference	<b>Parallel Processing Plan as Required under the <i>Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACKA)</i></b>
Issue Date	<b>January 1, 2026</b>
Revision Dates	TBD

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### Context

Under Section 12.2 of the [Fair Access to Regulated Professions and Compulsory Trades Act, 2006 \(FARPACKA\)](#), a regulated profession must have a plan addressing how it will enable multiple registration processes to take place concurrently. Regulated professions are required to file this parallel processing plan (PPP) with the Office of the Fairness Commissioner (OFC).

The PPP must:

- permit applicants who experience a delay<sup>1</sup> in one part of the registration process to proceed with other parts of the registration process wherever possible; and
- comply with any requirements set out in the regulations respecting the plan, including how the plan must address the matter described above.

Under Section 4.2 of the regulations under FARPACKA, the plan is required to include:

- steps setting out how the regulated profession will enable registration processes to take place concurrently, where feasible, including when there are delays;
- information about the circumstances in which the regulated profession will allow an applicant to choose whether to have different parts of their registration processes occur sequentially or concurrently; and
- information about how the regulated profession will ensure applicants have reasonably sufficient information to make an informed choice regarding sequential or concurrent processes, including information about the cost of examinations, tests and assessments, and the number of permissible attempts on examinations, tests, and assessments.

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<sup>1</sup> The OFC interprets “delay” to mean an interruption or extended timeframe to complete a specific step in the registration process due to factors beyond the applicant’s control. For example, waiting for academic transcripts from international educational institutions beyond a predefined period (e.g. 60 business days). Such a delay might apply to an individual applicant or a broader cohort (e.g. from a specific source country).

Neither FARPACTA nor the regulation prescribe a specific approach for developing a parallel processing plan. Rather, the legislation leaves it to individual regulators to diagnose common sources of delay, assess risk, and consider opportunities to improve registration processes. Additionally, the PPP must be updated whenever there is a change in circumstances, with the revised plan submitted to the Fairness Commissioner for review.

Before implementing a plan or updated plan, a regulated profession shall:

- respond to any input from the Fairness Commissioner regarding the plan (or updated plan); and
- obtain the Fairness Commissioner's approval of the plan (or updated plan) or implement the changes required by the Fairness Commissioner.

The PPP covered in this document is specific to the OAA's registration practices and is not intended to cover broader organizational procedures. The information is organized in accordance with the content as established in FARPACTA. There is also a "Communications and Outreach" section that explores potential paths for the OAA to take with respect to communicating options available to those seeking licence in Ontario, and ensuring the information is easily accessible and available.



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# Synopsis & Implementation

## Parallel Processing Opportunities: Licence

Research has identified several areas of potential parallel processing improvements within the registration practices for individuals seeking licence with the OAA. Implementation timelines have taken into consideration review and approval of the plan by the Fairness Commissioner in early 2026.

### 1. Academic Certification

The Canadian Architectural Certification Board (CACB) is working on a proposal for review and approval by the Regulatory Organizations of Architecture in Canada (ROAC) wherein the CACB Assessment Committee provides conditional certification. The conditional status would allow individuals to participate in the Internship in Architecture Program (IAP) while their academic certification application is under review. In the alternative, should ROAC not approve this proposal, OAA Council may wish to consider providing for provisional acceptance of eligible IAP experience gained while awaiting CACB certification.

**Implementation:** ROAC will hear the CACB proposal at its October 2025 meeting. Should the proposal be accepted, operational implementation can be expected to take place in 2026—this includes the steps required to obtain national approval at each jurisdictional Council. Should the proposal be rejected by ROAC, OAA Council will receive submissions at its March 2026 meeting that outline steps to provide provisional acceptance of eligible IAP experience gained while awaiting CACB certification. Should this be accepted by Council, OAA staff will work to make this operational in the second half of 2026.

Neither of these proposals require legislative amendments as they can be accommodated via amendments to the OAA Appendix B and other operational resources. Communication strategies would be developed to support and accompany the final resolution. (See the “Communications and Outreach” section for more information in this regard as well as with respect to the other parallel processing opportunities for licences and limited licences.)

### 2. Experience Submissions

Data indicates there are no systemic bottlenecks or delays in the review and approval process of IAP experience submissions. Opportunities for streamlining and improving reported timelines may exist through targeted enhancements, such as strengthened guidance, further automated reminders, or database updates to manage inactive drafts.

**Implementation:** Should Council agree to these enhancements, OAA staff will prepare submissions for the March 2026 Council meeting outlining the operational requirements, resources, and timeline for implementation.

Research regarding the registration experience of internationally educated individuals indicates consistent acknowledgement of pre-IAP international experience and confirms potential acceleration of registration. Opportunities for additional communication or resources to bring more awareness to the Experience Requirements Committee (ERC) route, or clarify when it is beneficial, may be considered by Council.



**Implementation:** Over the summer, the OAA sent a survey to internationally educated OAA members to better understand how resources can be used to bring forth more knowledge about registration options. A review and analysis of the data collected needs to be done before developing an awareness plan. Survey analysis is planned to be reported out at the December 2025 Council meeting. Within those submissions, any proposal for an awareness plan would be scheduled to occur after March 2026.

Neither of these proposals require legislative change as they are operational in nature.

### 3. OAA Admission Course

Upon review of the Admission Course data, Council may wish to consider researching the need for course capacity and removing any registration caps. Currently, the OAA increases the caps as required—however, research into the operational necessity for registration caps may be beneficial and remove any potential for delays or bottlenecks.

**Implementation:** This research can be undertaken by OAA Continuing Education staff and reported out to Council in the March 2026 meeting. Submissions would include details of any operational or IT resources required of any proposed changes.

Additionally, the OAA Council may wish to consider review and clarification of OAA Appendix B as it relates to course completion and OAA status. Although no delays have been encountered to date, greater clarity supports smooth operation of the registration process.

**Implementation:** This proposal can be reported to Council at its March 2026 meeting, and the Appendix B can be updated within a month.

Neither of these proposals require legislative change as they are operational in nature.

### 4. Examination

The OAA's licensing pathway enables individuals to progress through experience and examination components in a concurrent manner. Intern Architects also have the option to sit for the U.S. National Council of Architectural Registration Boards (NCARB) Architect Registration Examinations (AREs) to avoid potential delays. To support the choice of examination options, the OAA can bring more awareness of this choice via its website and social media communications. Nationally, a major project is underway to modernize the Examination for Architects in Canada (ExAC), of which the OAA is in full support. Included in this modernization research is transitioning the national exam to be available online.

**Implementation:** OAA resources dedicated to the examination can be updated by staff to support awareness of the choice to write the AREs; this can be accomplished within a month after March 2026 or the Fairness Commissioner's approval of the PPP.

**Implementation:** Through ROAC, the OAA is involved in a multi-phased project that will update and modernize certain aspects of the current pencil and paper examination, which is offered simultaneously across the country in November each year. A Working Group will be making a recommendation to the ROAC in October 2025 regarding the implementation of new software used specifically for item authoring, item banking, test generation, and statistical data storage reporting. Based on ROAC's approval in October, the implementation, testing, and training for the new software will take approximately 12 months. Options to transition the examination online will be addressed as an additional phase of the modernization project. It is anticipated an additional two years would be required to prepare for and complete that transition.

Neither of these proposals require legislative change as they are operational in nature.



## Parallel Processing Opportunities: Limited Licence

The OAA's consideration of parallel processing takes into account the introduction of the OAA Technology Program (OTP), which was launched in January 2025. Given the recency of this program, there is not yet sufficient data available to support a reliable, evidence-based interpretation or analysis of registrant experiences specific to this pathway.

While the OAA cannot yet provide program-specific data analysis, it can reasonably anticipate that lessons learned from long-standing registration practices will be transferrable and instructive. Building on these lessons, this report has identified several areas of potential parallel processing and improvement opportunities within the registration practices for individuals seeking a limited licence with the OAA.

Implementation timelines have taken into consideration review and approval of the plan by the Fairness Commissioner in early 2026.

### 1. OAA Admission Course

Upon review, OAA Council may wish to consider removing the prerequisite requirements within the OTP for Intern Technologists intending to complete the OAA Admission Course. Eliminating the prerequisites may be beneficial and remove any potential for delays or bottlenecks.

**Implementation:** This proposal can be reported to Council at its March 2026 meeting and should it receive approval be operationally implemented and communicated within three months.

This proposal does not require legislative change as it is operational in nature.

### 2. Examination

The OAA's limited licence pathway enables individuals to progress through experience and examination components in a concurrent manner. The OAA Council may wish to consider removing the Admission Course prerequisite and its inherent time and experience requirements and simplify exam eligibility to a quantum of approved experience hours.

Additionally, OAA Council may wish to consider dedicating resources to research and development of the modernization of the Licensed Technologist examination.

**Implementation:** The proposal to simplify exam eligibility can be reported to Council at its March 2026 meeting and, should it receive approval, ideally be operationally implemented and communicated to be ready for exam registration in April 2026.

**Implementation:** A proposal to research the modernization of the Licensed Technologist examination can be reported to Council for their March meeting. Such a multi-stage project would involve an initial consultative review of the existing framework, and then subsequent reports and proposals prior to any determination on how best to proceed. This would need two years to implement, and the timing would be further influencing by alignment with the examination schedule.

These proposals do not require legislative change as they are operational in nature.



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## Communications and Outreach

Recognizing the importance of having equitable registration plans with concurrent processes, the OAA appreciates this is only of benefit to those wishing to practise architecture in Ontario if they are fully aware of all the options and opportunities and provided with access to thorough, transparent information. The Association is committed to implementing clear and proactive communication plans for any approved proposals.

Such outreach plans are being developed to ensure both existing registrants and those on the path to licensure are fully informed of the steps being taken by Council to respond to provincial legislation, the options available to individuals should they encounter delays or barriers in their licensing journey, and the broader measures the OAA is pursuing to support fairness, transparency, and efficiency in the registration process.

As cited elsewhere in this plan, data from a recent survey indicated a lack of awareness of current and past opportunities for seeking recognition of international experience. For example, large numbers stated they were unaware they could submit supervised post-graduate international experience gained prior to IAP enrolment or that they wished the information had been made clearer when they themselves were going through the process. This insight on what would have been helpful will now prove invaluable for the next generation of applicants. The OAA can use all this feedback to shape any new resources and continue to reach out to this group should more information or advice be needed.

To ensure timely communication with individuals, applicants and members, the OAA intends to push out communications messaging once its parallel processing plan is approved by the Fairness Commissioner, outlining next steps and how it will continue to communicate to stakeholders the relevant issues. The goal is to ramp up communication and information dissemination in a manner that enables individuals to make informed choices about the order in which they complete requirements. For outreach to members and to the wider public, the Association employs a range of methods that will be tailored toward this topic.

### OAA Website

Continually updated information will be made available in the [International Credentials and Mobility](#) section of the website, with direct, clear links to the [Becoming a Licensed Technologist](#), [Becoming an Architect](#), and [Provincial Fair Access Requirements](#) sections. Encompassing updated webpages as well as new Frequently Asked Questions (FAQ) sections and clear contact information for the Office of the Registrar, these newly enhanced pages will include, but not be limited to, enhanced guidance on the ability to write the NCARB AREs to avoid potential delays. (For this example, the new material would be posted and shared shortly after the Fairness Commissioner's approval of the parallel plan.) The OAA Website itself is a "living document," which would be continually updated.

Beyond the webpages, OAA staff would also update various existing pdfs and other online documents to ensure information is available. One example includes the [Mentorship Guide](#), which was created for those in the IAP and OTP programs, as well as those Supervising Architects and Mentors supporting them. Ensuring that not only the individuals with international education, but also their Mentors are aware of the available options increases the likelihood one can make an informed decision.

The OAA would also create a pdf "digital handbook" for internationally educated individuals looking to become licensed in the province, bringing together various pieces of information from the OAA Website into one succinct document. Having a centralized digital document that could be easily printed allows the OAA to quickly share pertinent information about parallel processes and other aspects.



## Direct Email Notifications and E-newsletters

The OAA will send *Regulatory Bulletin* emails to all those who hold status with the Association, including Intern Architects, Intern Technologists, and the individuals serving as Mentors or Supervisors, to ensure everyone is aware of previously existing options and any new changes. Such regulatory emails are sent through the Association's iMIS database, which strengthens the likelihood recipients will see the message. This ensures that those who have unsubscribed from regular OAA email communications will still be sent the information.

Using the same process, targeted emails can also be sent to specific groups, such as more in-depth messaging for people with international education or work experience or emails specifically to those in the OTP, acknowledging the potentially simplified exam eligibility after the March 2026 Council meeting. Further, emails could be sent to Mentors and Supervising Professionals, directing them to share the info with those who would benefit from the information.

In addition to the special *Regulatory Bulletins*, the Association regularly sends *OAA News* (biweekly), *Practice Advisories* (bimonthly), and *intern news* (quarterly). These e-newsletters would also have regular reminders specific toward the parallel processing plan and international mobility, with links to more information.

## Social Media

The OAA will be sharing more information on the parallel processes and, more generally, international mobility, across its social media channels - most notably on LinkedIn, but also in Instagram stories and Facebook. A social media calendar of evergreen posts is in development - it will include various pieces of regulatory information, some of which will have a focus on licensing and registration that explores options for international and provincial mobility.

## Local Architectural Societies

Located in 14 communities across Ontario, the Local Architectural Societies are the regional chapters of the OAA, providing opportunities for dialogue between the profession and the wider architectural community. The Societies—examples include the Toronto Society of Architects, the Ottawa Regional Society of Architects, and the Northwestern Ontario Society of Architects—work to raise the awareness, appreciation, and understanding of architecture within their communities. Beyond OAA registrants, their membership also comprises those who hold no official status with the Association and may include internationally experienced architects looking to become licensed in Ontario.

The OAA would share the new information with the Society Chairs and explore ways those individual groups can also engage in outreach with their local communities.

## Videos

The OAA regularly records continuing education videos for its members before posting them on a [YouTube Channel](#) for free, on-demand viewing by not only the membership, but also the wider public. Along these same lines, a new instructional video would be produced that is dedicated to licensure and international mobility. It would explore the various items related to this path to licensure, including validity of experience, mobility, parallel options, and information sources. Links to this video would be shared through the previous channels listed above, as well as shared directly with other relevant groups. For example, the OAA offers support related to licensing information for JVS Toronto's [Immigrant Professionals Leveraging Architectural Knowledge for New Opportunities \(IPLAN\)](#) employment and practice courses. In addition to ensuring the new parallel processes and international mobility material is shared directly with participants, the new video would also be provided.



## Implementation Strategy

<b>Approximate Timelines for Parallel Processing Proposals – Post Fairness Commissioner Approval</b>			
<b>Proposal</b>		<b>Proposal to Council</b>	<b>Implementation on Approval</b>
1	IAP Academic Certification – CACB conditional certification	March 2026	TBD nationally
	IAP Academic Certification – OAA provisional acceptance of experience	March 2026	Sept 2026
2	IAP Experience Submissions – Targeted enhancements	March 2026	Sept 2026
	IAP Experience Submissions – Awareness plan	March 2026	December 2026
3	OAA Admission Course – Registration improvements	March 2026	June 2026
4	IAP Examination – Awareness of options	Operational	April 2026
	IAP Examination – ExAC modernization	Multiple approval stages	Approx. 2028
5	OTP Admission Course – Removal of prerequisites	March 2026	April 2026
6	OTP Examination – Simplification of eligibility	March 2026	April 2026
	OTP Examination – Modernization project	March 2026	Approx. 2028

### The Registration Committee

The OAA's legislation provides that any individual seeking a licence or limited licence may seek licensure via the Registration Committee. This statutory right to a hearing ensures that applicants are afforded the opportunity to present their qualifications comprehensively and demonstrate that they meet the standard for licensure, even where their pathway does not align precisely with established requirements.

Beyond any proposals the Council may consider to enhance parallel processing, access to the Registration Committee serves as an important means to mitigate potential delays, thereby supporting timely entry to practise for qualified individuals. This mechanism supports efficiency in registration practices for qualified individuals, aligning with the principles of fair registration oversight. The OAA is committed to its ongoing efforts to bring more awareness to this option for those seeking licensure in Ontario.



## Data and Information

The tables below enumerate the legislative registration requirements for licence and limited licence. The Commentary column highlights the process' dependencies—including sequential steps, current concurrence, and opportunities for parallel processing—that will be examined in a further section.

Licence: Architect	Commentary
<p>31. The following academic, experience, and examination requirements for the issuance of a licence to a person are prescribed for the purposes of Clauses 13 (1) (d) and (e) of the Architects Act:</p>	
<p>1. The person must hold a degree in architecture from a post-secondary institution or must have successfully completed the Royal Architectural Institute of Canada (RAIC) Syllabus.</p>	<p>Completed prior to enrolment in the IAP.</p> <p><b>Concurrence:</b> ROAC permits up to 760 hours gained while a master's degree student at a CACB- or NAAB-accredited school of architecture to be logged toward experience requirements.</p>
<p>2. The person must hold a certificate issued by the Canadian Architectural Certification Board.</p>	<p>Completed prior to enrolment in the IAP.</p> <p><b>Concurrent Opportunity:</b> To provide for conditional certification where delays are experienced or provisional acceptance of experience gained while awaiting CACB certification.</p>
<p>3. The person must have completed the Admission Course offered by the Association.</p>	<p>The OAA Admission Course can be completed at any time during enrolment in the IAP.</p> <p><b>Concurrent Opportunity:</b> To accept successful completion toward licensure if Admission Course is taken while not enrolled in the IAP (within a certain timeframe prior to making application for licence).</p>



<p>4. The person must have successfully completed one of the following:</p> <p>i. The Examination for Architects in Canada published by the Association.</p> <p>ii. The Architect Registration Examination of the National Council of Architectural Registration Boards.</p> <p>iii. Any combination of the components of the Examination for Architects in Canada published by the Association and of the Architect Registration Examination of the National Council of Architectural Registration Boards that, considered as a whole, is equivalent to one of those examinations, as approved by the Council.</p>	<p><b>Concurrence:</b> The examination is experience/practice-based, structured on the experience categories of the IAP. ExAC eligibility requires completion of 75% (2800hrs) of the experience requirements.</p> <p>Option 4(ii) - The AREs provided by NCARB in the United States are on-demand and can be written any time during the internship.</p> <p><b>Opportunity:</b> ROAC project is underway to modernize ExAC.</p>
<p>5. The person must have completed a total of 3,720 hours of experience, under the personal supervision and direction of a person authorized to practise architecture in the jurisdiction in which the experience is obtained, that meets the requirements of the Internship in Architecture Program published by the Association. At least 940 hours of the experience must have been completed within the three years before the date on which the person applies for the licence.</p>	<p>Experience can be completed at any time during enrolment in the IAP.</p> <p>Note: If individuals wish to use eligible post-graduate international experience gained prior to enrolment in the IAP, they can do so provided they attend an ERC assessment on application for licence.</p>
<p>6. If fewer than 940 of the total hours of experience required by paragraph 5 were completed in Canada, the person must have successfully completed the Council approved courses specified in the Internship in Architecture Program published by the Association.</p>	<p>If required, the alternative to Canadian experience can be completed at any time during the internship program.</p>
<p>7. The person must have completed an experience assessment provided by the Association.</p>	<p>The experience assessment can be completed at any time during the internship program.</p>



<b>Limited Licence: Licensed Technologist</b>	
32. (1) <i>The following academic, experience, and examination requirements for the issuance of a limited licence to a person are prescribed for the purposes of Clauses 13.1 (1) (d) and (e) of the Architects Act:</i>	
1. <i>The person must hold an advanced diploma from an Ontario college of applied arts and technology for a three-year architectural technology program or have graduated from a three-year college architectural technology program accredited by Technology Accreditation Canada.</i>	Completed prior to enrolment in the OAA Technology Program.  <b>Concurrence:</b> Intern Technologists may submit up to 1,940 hours of eligible retroactive work experience gained prior to enrolment in the OTP.
2. <i>The person must have completed the Admission Course offered by the Association.</i>	Individuals must be enrolled in the OTP for a minimum of 12 months and have completed at least 2,790 approved hours of Experience Record Book (ERB) work experience to be eligible to take the OAA Admission Course.  <b>Concurrent Opportunity:</b> Remove any prerequisite for course.
3. <i>The person must have successfully completed the Examination for Licensed Technologists published by the Association.</i>	To be eligible to take the examination, individuals must have successfully completed the OAA Admission Course, which requires 2,790 approved ERB hours. The examination is experience/practice-based, tied to the experience categories of the OTP. The prerequisite supports success. Exam eligibility requires completion of 50% of the experience requirements.  <b>Concurrent Opportunity:</b> Simplify eligibility and research modernizing examination.
4. <i>The person must have completed a total of 5,580 hours of experience, under the personal supervision and direction of a person authorized to practise architecture in the jurisdiction in which the experience is obtained, that meets the requirements of the OAA Technology Program published by the Association. At least 940 hours of the experience must have been completed within the three years before the date on which the person applies for the limited licence.</i>	Experience can be completed at any time during the internship process.
5. <i>If fewer than 940 of the total hours of experience required by paragraph 4 were completed in Canada, the person must have successfully completed the Council-approved courses specified in the OAA Technology Program published by the Association.</i>	If required, the alternative to Canadian experience can be completed at any time during the internship program.



6. The person must have completed an experience assessment provided by the Association.

The experience assessment can be completed at any time during the internship program.

The processing map below illustrates key registration steps based on historical records. (The OAA Technology Program, which launched in January 2025, will not yet have the data sets for those pursuing limited licence; it has not been included.) The key registration steps typically take place concurrently, meaning that individuals are not required to complete one step before beginning another; instead, they may pursue multiple requirements at the same time, if they wish. For example, individuals may gain and record experience while they complete the OAA Admission Course and or prep and write the exams.

Major Step	Party Responsible		Avg Time on Receipt of All Documents (2024)	Max Time on Receipt of All Documents (2024)	Primary Cause of Delay	Potential for Parallel Processing
<b>Academic:</b> certification of academic qualifications	Canadian Architectural Certification Board (CACB)	Canadian Accredited	0.09 week	1 week	No delay	Yes (eligible student hours)
		U.S. Accredited	0.02 week	1 week	No delay	Yes (eligible student hours)
		International Non-accredited	20.11 weeks	36 weeks	Procedural	Yes (potential for conditional or provisional certification) *
		Canberra Accord	22.66 weeks	33 weeks	Procedural	Yes (potential for conditional or provisional certification) *

\* Internationally educated individuals can include eligible experience hours gained prior to enrolment in the IAP.

Major Step	Party Responsible	Availability	Results Reporting Time	Potential for Parallel Processing
<b>Examinations:</b> Scheduling and grading	Committee for the Examinations for Architects in Canada (CExAC)	Paper-based, once a year.	Results communicated within 2.5 weeks of grading completion.	Concurrent
	National Council of Architectural Registration Boards (NCARB)	Online, on-demand.	Results sent within 7–10 days of test date.	Concurrent



<b>Admission Course</b>	OAA	Online, three times a year.	Results are available via online portal within one week after completion.	Concurrent
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<b>Major Step</b>	<b>Party Responsible</b>		<b>Average Time for Review and Approval (2024)</b>	<b>Primary Cause of Delay</b>	<b>Potential for Parallel Processing</b>
<b>IAP Work Experience:</b> Verification and assessment	OAA	Submission Draft	78 calendar days	Intern-dependent**	Concurrent
		Supervising Architect Submission Review	26 calendar days	Typically, no delay	Concurrent
		Mentor Submission Review	16 calendar days	Typically, no delay	Concurrent
		OAA Pending Review*	26 calendar days	Intern-dependent	Concurrent
		OAA Submission Approval	14 calendar days	Typically, no delay	Concurrent
	OAA	International Experience gained prior to enrolment in IAP	If used toward licensure requirements, reviewed by statutory committee at time of making application for licence.	Typically, no delay to review submission once received.***	Concurrent, can enrol and participate in IAP while awaiting verification
<b>Experience Self-Assessment</b>	Intern Architect	OAA Confirmation	14 calendar days	Typically, no delay	Concurrent

\* Submission set to pending review when clarification or elaboration of activities is required.

\*\* The data set for submission drafts can be skewed by drafts that are never completed by Intern who may decide to create a new draft.

\*\*\* [Alternative Documentation Policy](#) may alleviate challenges related to information verification where applicable.

<b>Major Step</b>	<b>Party Responsible</b>	<b>Avg Time on Receipt of All documents (2024)</b>	<b>Max Time on Receipt of All Documents (2024)</b>	<b>Primary Cause of Delay</b>	<b>Potential for Parallel Processing</b>
<b>Final Decision</b>	OAA	5 days	10 days	Decisions made within FARPACKTA timeframe.	N/A (registration decisions follow receipt of everything required in respect of an application)



# Analysis: Licence

## Academic Certification

Academic certification decisions are rendered on behalf of the CACB by the CACB Assessment Committee. Applicants have the right to request a reassessment of their application or appeal the decision.

There are three possible outcomes:

- full certification (full compliance with the Canadian Education Standard [CES] requirements): a certification number is issued for registration within the IAP);
- provisional certification (partial compliance with CES; the applicant's academic qualifications are deficient in a particular subject area, and they are required to further their studies to fill the gaps in this identified subject area by completing courses assigned by the CACB): a provisional certification number is issued to allow enrolment within the IAP while completing the courses within a maximum of 18 months; and
- individual is denied academic certification (the individual's academic qualifications do not fulfil the minimum requirements to be evaluated by the Assessment Committee or for registration/licensure requirements in Canada).

2024 CACB Statistics								
	Total number of certification requests	Total number certified	Application Process Timeline from First Point of Contact			Application Process Timeline from Receipt of All Required Documents		
			Minimum	Average	Maximum	Minimum	Average	Maximum
<b>Canadian Accredited Graduates</b>	218	218	0 weeks	0.25 weeks	1 week	0 weeks	0.09 weeks	1 week
The processing times for graduates of CACB-accredited programs are consistently very short. On average, applications are processed within one week or less from the initial point of contact and even more rapidly once all required documents have been received.								
<b>U.S. Accredited Graduates (NAAB)</b>	33	33	0 weeks	0.48 weeks	4 weeks	0 weeks	0.02 weeks	3 weeks
The processing times for NAAB-accredited graduates are consistently short, with applications processed in less than half a week on average and almost immediately once all required documents are received.								



<b>International Graduates (non-U.S.)</b>	197	153	18 weeks	30.09 weeks	65 weeks	1 week	20.11 weeks	36 weeks
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*Note: The difference between the total number of certification requests received and the total number of certifications issued reflects files still in progress, due to assessment activities overlapping between reporting years. This means that some applicants certified in 2024 submitted their applications in 2023, while certain files received in 2024 will be certified in 2025.*

The data indicates the average processing time for this group is approximately 30 weeks from initial contact, decreasing to 20 weeks on average once all required documents have been received. This demonstrates that timely and complete submissions are key factors in reducing assessment timelines and maintaining process efficiency.

A review of the files that experienced processing times exceeding 50 weeks indicates two major contributing factors:

- late or staggered submissions (in several cases, there was a significant gap between the receipt of payment and the receipt of all required documents, delaying the start of the assessment process); and
- requests for missing information (some files were incomplete upon initial submission, requiring the office to issue requests for missing information—the time taken by individuals to respond to these requests, ranging from several weeks to months, contributed significantly to the overall timeline).

In summary, the extended processing times were primarily due to incomplete submissions, delays in providing requested information, and required re-queuing of files, rather than inefficiencies in the standard certification process itself.

<b>Canberra Accord Graduates</b>	9	5	31 weeks	31.5 weeks	33 weeks	5 weeks	22.66 weeks	33 weeks
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*Note: The difference between the total number of certification requests received and the total number of certifications issued reflects files still in progress, due to assessment activities overlapping between reporting years. This means that some applicants certified in 2024 submitted their applications in 2023, while certain files received in 2024 will be certified in 2025.*

The figures indicate the average processing time for graduates from Canberra Accord–recognized programs are approximately 31 weeks from initial point of contact, decreasing to an average of 23 weeks once all required documents have been received.

This shows timely and complete submissions are critical to reducing assessment timelines for internationally accredited graduates.

Prior to completing their academic qualifications, the IAP permits up to 760 hours gained while a master’s degree student at a CACB- or NAAB-accredited school of architecture to be logged toward experience requirements. This provision supports parallel processing by allowing students to log relevant experience hours while still completing their academic qualifications. By enabling experience to be recorded concurrently with education, there is no need to wait until graduation to start meeting IAP requirements, which helps avoid delays or bottlenecks in the overall registration process. It creates a more streamlined pathway, allowing interns to progress efficiently toward licensure without unnecessary sequential dependencies.



**Parallel Processing Opportunity:** The CACB is working on a proposal for ROAC review and approval wherein the Assessment Committee provides conditional CACB certification. The conditional status allows individuals to participate in the IAP while their academic certification application is under review.

In the alternative, should ROAC not approve this the proposal, OAA Council may wish to consider providing for provisional acceptance of eligible IAP experience gained while awaiting CACB certification.

## **IAP Experience Submissions**

The 2024 data sample of review and approval timelines indicates the most significant delays occur at intern-dependent stages, particularly during the drafting of submissions, which averages 78 calendar days. This figure may be skewed, as some interns leave drafts incomplete and later create new versions, artificially extending the apparent time in draft.

A similar pattern of Intern dependence appears in the OAA Pending Review stage (26 days). At this point, the system automatically issues an email when the Canadian Experience Record Book (CERB) status changes to “Pending Review,” and staff follow up with a detailed message outlining what is required. Submissions are tracked monthly, and reminder emails are issued if required information is not received within a reasonable time.

By contrast, the Supervising Architect, Mentor, and OAA Approval stages show efficient turnaround times, with minimal delays—all well within the eight-week timeframe of the IAP Appendix B.

Overall, the process is efficient once materials are in active review; the greatest opportunities for improvement lie in addressing delays tied to Intern responsiveness. Council may wish to direct staff to explore enhancements to the existing reminder system and guidance tools to further reduce inactive draft times and promote more consistent progress through the process.

It is also important to note interns can progress through their experience submissions at their own pace. There are no sequential requirements or prescribed timelines that would limit an intern’s ability to record experience across the required categories. Likewise, there are no dependencies in the process that would prevent an Intern from moving forward with their submissions once they are ready. As such, while individual responsiveness may affect overall timelines, the structure of the process itself does not create barriers or delays to recording and submitting experience.

## **Observer or Parallel Experience**

The OAA Appendix B provides for “Observer or Parallel Experience.” OAA Council created a unique opportunity for interns to gain essential experience outside their place of eligible employment through observer or parallel experience work. This provision is designed to support Interns who may face barriers in accessing the full range of required experience within their workplace, ensuring they are not disadvantaged in progressing toward licensure. By allowing up to 600 hours of this type of experience, the OAA provides a flexible mechanism to help interns bridge gaps in their training and continue advancing in their professional development, even when circumstances in their employment setting present limitations. Appendix B provides clear information, guidelines, and forms for the use of observer or parallel experience submissions.



## Internationally Educated Individuals: Experience Gained Prior to Enrolment in IAP

The IAP requires all CERB architectural experience be gained while an Intern Architect. However, the OAA has created a process to provisionally accept eligible international experience gained prior to enrolment in the IAP. This process is specific to internationally educated individuals to reduce barriers for those from schools of architecture that are not accredited by CACB or NAAB.

In alignment with the national IAP Manual requirements, if any international experience gained while not in the IAP forms part of the experience submission at the time of making application for licence, the applicant will be required to attend an assessment interview with the OAA Experience Requirements Committee (ERC).

Although this process has been in place for some time, data indicates only a small group of internationally educated individuals submit pre-IAP international experience and, further, fewer use the experience as a qualification at time of making application for licence.

It may be helpful to examine and quantify the registration experience of individuals with international academic origins and the number of applicants with experience prior to enrolment in the IAP. The last five years of statistics are below.

	2020	2021	2022	2023	2024
Individuals licensed via the IAP	180	209	245	185	222
Average time in IAP: All (yrs)	5.62	6.11	5.89	5.2	5.34
<b>Individuals licensed via IAP with international academic origin</b>	<b>65</b>	<b>77</b>	<b>77</b>	<b>78</b>	<b>81</b>
Average time in IAP for international academic origin (yrs)	5.39	5.65	5.7	5.32	5.25
Minimum time in IAP for international academic origin (yrs)	0.64	0.88	2.3	2.25	2.4
Maximum time in IAP for international academic origin (yrs)	19.38	17.32	30.57*	16.81	13.14
<b>Individuals that submitted international experience gained prior to enrolment in IAP</b>	<b>11</b>	<b>17</b>	<b>10</b>	<b>10</b>	<b>13</b>
Individuals with international experience gained prior to IAP enrolment used to accelerate Examination for Architects in Canada (ExAC) completion	10	16	7	5	12
Individuals with international experience gained prior to enrolment in IAP who attended Experience Requirements Committee (ERC)	3	5	4	3	1

The table shows it is a minority of individuals with international academic origins that submit experience gained prior to enrolment in the IAP. Information regarding prior international experience is available through several resources: within the IAP enrolment application and confirmation letter, the [OAA Website](#), the IAP Manual and the [OAA Appendix B](#), as well as direct staff conversations. However, the question remains as to why that minority did not avail themselves of the option to use the prior international experience and an ERC assessment to expedite registration. This issue requires an in-depth look at the individual circumstances.



## Observations Regarding Individual Registration Experiences

The OAA conducted a detailed analysis of the individual registration experiences between 2020 and 2024, which resulted in the following observations.

### 2024 General Observations

- The OAA licensed 222 individuals upon completion of the IAP; 81 had international academic origins.
- Of those 81 individuals with international academic origin, 13 submitted experience hours gained prior to enrolment in the IAP.
- The average time to become licensed for those 13 was 4.1 years. However, the average can be misleading—for example, one registrant who took 7.78 years did not work between 2017 and 2021 for personal reasons.
- Twelve of the 13 individuals used their prior international experience to be eligible to sit for the Examination for Architects in Canada (ExAC).
- While 10 of the 13 individuals were eligible to write the ExAC in the same year they enrolled in the IAP, most waited for later sittings.
- Having prior international experience does not necessarily fulfil the minimum requirements of the experience categories. For example, only three of the 13 had prior experience that fulfilled the IAP experience categories. The remaining would be required to fulfil the minimum experience requirements outstanding for each competency category.
- Only one of the 13 individuals had prior experience that could have addressed the currency requirement at the time of enrolment in the IAP. Given the period in which the prior experience was gained, this means most of the 13 individuals would still have required 940 hours of experience gained within the three years directly preceding application for licence.
- One of the 13 individuals applied for licence using their prior international experience and an ERC assessment. The ERC determined the experience met the requirements of the regulations, conditional upon the completion of two online courses offered by the Royal Architectural Institute of Canada (RAIC)—“Fire Protection/Life Safety” and “Building Envelope.”
- In general, while the individuals with prior international experience work to complete outstanding requirements, they gain enough experience to forego an ERC assessment referral upon application for licence.

### 2023 General Observations

- The OAA licensed 185 individuals upon completion of the IAP; 78 had international academic origins.
- Of the 78 individuals with international academic origin, 10 submitted experience hours gained prior to enrolment in the IAP.
- The average time to become licensed for those 10 was 5.27 years. However, the average can be misleading—for example, one registrant who took 9.92 years to become licensed had lapsed their status with the OAA for three years and was otherwise inactive for a further two.
- Five of the 10 individuals used their prior international experience to be eligible to sit for the ExAC.
- While nine of the 10 individuals were eligible to write the ExAC using their prior international experience to accelerate the registration process, most wrote the exams in subsequent years.



- Having prior international experience does not necessarily fulfil the minimum requirements of the experience categories. For example, only three of the 10 had prior experience that fulfilled the IAP experience categories. The remaining would need to fulfil the experience requirements outstanding for each competency category.
- Only one of the 10 individuals had prior experience that could have addressed the currency requirement at the time of enrolment in the IAP; meaning that given the period that the prior experience was gained, most of the 10 individuals still would have required 940 hours of experience gained within the three years directly preceding application for licence.
- Three of the 10 individuals applied for licence using their prior international experience and an ERC assessment. The ERC determined the experience met the requirements of the regulations, conditional upon the completion of a course for two of the individuals and further quantified experience for the third to address specific deficiencies.
- In general, while the individuals with prior international experience work to complete outstanding requirements, they gain enough experience to forego an ERC assessment referral upon application for licence.

## 2022 General Observations

- The OAA licensed 245 individuals upon completion of the IAP; 77 had international academic origins.
- Of those 77 individuals with international academic origin, 10 submitted experience hours gained prior to enrolment in the IAP.
- The average time to become licensed for the 8 of the 10 was 5.16 years. However, the average can be misleading—for example, one registrant who took 8.89 years to become licensed was not employed within a context for which they could submit experience for six years. Another registrant who took 7.92 years to become licensed was inactive with the OAA for 3.67 years during that time. Additionally, two of the 10 were separated from the average timeline due to periods of significant inactivity with the OAA.
- Eight of the 10 individuals used their prior international experience to be eligible to sit for the ExAC; one of the 10 chose to instead write the Architect Registration Examination (ARE) of the U.S. National Council of Architectural Registration Boards (NCARB).
- Having prior international experience does not necessarily fulfil the minimum requirements of the experience categories. For example, only two of the 10 had prior experience that fulfilled the IAP experience categories. The remaining would need to fulfil the experience requirements outstanding for each competency category.
- Only one of the 10 individuals had prior experience that could have addressed the currency requirement at the time of enrolment in the IAP. Given the period in which the prior experience was gained, this means most of the 10 individuals still would have required 940 hours of experience gained within the three years directly preceding application for licence.
- Four of the 10 individuals applied for licence using their prior international experience and an ERC assessment. For two of the individuals, the ERC determined that the experience met the requirements of the regulations. For the other two, the ERC determined that the experience met the requirements of the regulations, conditional upon the completion of a course and/or further quantified experience to address specific deficiencies. Two of the 10 individuals made exemption requests to Council.
- In general, while the individuals with prior international experience work to complete outstanding requirements, they gain enough experience to forego an ERC assessment referral upon application for licence.



## 2021 General Observations

- The OAA licensed 209 individuals upon completion of the IAP; 77 had international academic origins.
- Of those 77 individuals with international academic origin, 17 submitted experience hours gained prior to enrolment in the IAP.
- The average time to become licensed for the 17 was 6.24 years. However, this average can be misleading—for example, one registrant who took 17.31 years to become licensed had enrolled as an intern in 2004 but was otherwise inactive with the OAA until 2011 as they maintained business commitments abroad. After one experience submission in 2011, they were again inactive with the OAA until 2018.
- Sixteen of the 17 individuals used their prior international experience to be eligible to sit for the ExAC, while the remaining one wrote the ARE.
- Having prior international experience does not necessarily fulfil the minimum requirements of the experience categories. For example, six of the 17 had prior experience that fulfilled the IAP experience categories. The remaining would need to fulfil the experience requirements outstanding for each competency category.
- Only two of the 17 individuals had prior experience that could have addressed the currency requirement at the time of enrolment in the IAP. Given the period in which the prior experience was gained, this means most of the 17 individuals still would have required 940 hours of experience gained within the three years directly preceding application for licence.
- Four of the 17 individuals applied for licence using their prior international experience and an ERC assessment. For three of the individuals, the ERC determined the experience met the requirements of the regulations. For the other one, the ERC determined the experience met the requirements of the regulations, conditional upon the completion of a course. One of the 17 individuals made an exemption request to Council.
- In general, while the individuals with prior international experience work to complete outstanding requirements, they gain enough experience to forego an ERC assessment referral upon application for licence.

## 2020 General Observations

- The OAA licensed 180 individuals upon completion of the IAP; 65 had international academic origins.
- Of those 65 individuals with international academic origin, 11 submitted experience hours gained prior to enrolment in the IAP.
- The average time to become licensed for the 11 was 4.7 years. However, this average can be misleading—for example, one registrant who took 9.33 years to become licensed had registered as an intern in 2011, submitted their pre-IAP hours to the OAA in 2013, but was otherwise inactive until 2018.
- Ten of the 11 individuals used their prior international experience to be eligible to sit for the ExAC. The remaining one wrote the ARE.
- Having prior international experience does not necessarily fulfil the minimum requirements of the experience categories. For example, only two of the 11 had prior experience that fulfilled the IAP experience categories. The remaining would need to fulfil the experience requirements outstanding for each competency category.
- Only three of the 11 individuals had prior experience that could have addressed the currency requirement at the time of enrolment in the IAP. Given the period in which the prior experience was gained, this means most of the 11 individuals still would have required 940 hours of experience gained within the three years directly preceding application for licence.



- Three of the 11 individuals applied for licence using their prior international experience and an ERC assessment. For two of the individuals, the ERC determined the experience met the requirements of the regulations. For the other one, the ERC determined the experience met the requirements of the regulations, conditional upon the completion of further quantified experience to address specific deficiencies.
- In general, while the individuals with prior international experience work to complete outstanding requirements, they gain enough experience to forego an ERC assessment referral upon application for licence.

### **High-Level Summary (2020–2024)**

The above information highlights the ongoing review of registration experiences of individuals entering the IAP with prior post-graduate international experience. The review found international experience is both recognized and used within the OAA's registration framework.

- Across the five years, 10 to 17 internationally educated individuals submitted pre-IAP experience per year, representing 13 to 22% of internationally educated licensees annually.
- Average time to licensure for these applicants ranged between 4.1 and 6.2 years, but timelines varied widely due to personal reasons, inactivity, employment gaps, or lapsed status, rather than the presence or absence of pre-IAP experience itself.
- The primary benefit of pre-IAP experience was eligibility to sit for the ExAC earlier than those without pre-IAP experience. In most years, 80 to 90% of those submitting pre-IAP hours were able to use them toward exam eligibility. While many were eligible to write the ExAC the same year they enrolled as interns, they nevertheless often chose to wait for later sittings.
- Experience deficiencies remained the major item to address—only a small fraction each year (i.e. between two and six individuals) had pre-IAP experience that completed the IAP's required competency categories. Most still needed to gain additional hours to fulfil outstanding categories.
- Typically, only one to three individuals per year had pre-IAP experience that satisfied the currency requirement for recent hours (within three years of application for licence).
- ERC assessments played a role for a subset (roughly 25 to 40% in some years), where pre-IAP experience was reviewed to determine equivalence. Most ERC outcomes confirmed the experience met requirements, sometimes conditional on completing a course or additional quantified hours.
- Importantly, by the time of licence application, many of these individuals had accumulated enough new experience to forego an ERC assessment. This suggests pre-IAP experience helps accelerate progression but does not translate to licensure on its own.

### **OAA Survey of Internationally Educated Individuals: Preliminary Results**

While the information above clarifies the number of individuals who submit pre-IAP international experience and its impact on their registration process, it remains unclear whether more than 16% of internationally educated individuals could log such experience—and, if so, why they have not. To explore this, the OAA circulated a survey in the summer of 2025 to Architects with international academic backgrounds, aiming to identify actionable opportunities that could enhance the registration practices for individuals with pre-IAP international experience.

The survey was circulated to 634 OAA Architects, with 113 responses received. While nearly all confirmed they had supervised post-graduate architecture-related work experience prior to enrolling in the IAP, only 23 submitted this experience for provisional acceptance. This ratio (i.e. 20%) is roughly in line with the research above.



The survey results clearly indicate that bringing more awareness to the option to submit pre-IAP international experience hours would be an important actionable item for the OAA. Of the 99 who responded to the question, 43% confirmed they were not aware they could submit supervised post-graduate international experience gained prior to enrolment in the IAP and that it could be used toward the qualifications for licence with the condition of an Experience Requirements Committee assessment.

Additionally, some respondents felt the process was unclear. Thirty-eight individuals, with the hindsight afforded by improved guidance and information, confirmed they would have pursued licence using the pre-IAP experience hours and ERC assessment route.

A proposal to create more awareness and improve process information can be planned for submission to the OAA Council in 2026.

As timelines are often used to assess registration practices, it is worth noting that 26% of the survey respondents confirmed that they took a break from actively pursuing licensure after enrolling with the OAA—whether for personal obligations, lack of work, or because they pursued employment unrelated to architecture.

### **Timelines as a Measure of Viability**

Ontario's architectural profession operates under a distinct two-tier system that separates individual licensure from the authorization to provide services to the public. Individuals who meet the educational, experiential, and examination requirements are licensed by the OAA to use the title "Architect." However, a separate authorization—the certificate of practice (CoP)—is required for any corporation, partnership, or sole practitioner to provide architectural services to the public. The CoP carries the obligation to maintain professional liability insurance, which is tied to the firm rather than to individual Architects. This distinction plays an important role in providing access and meaningful participation in the profession for many individuals.

Under the *Architects Act*, the practice of architecture in Ontario includes the involvement of unlicensed individuals in substantive ways. Intern Architects, internationally educated individuals, architectural technologists, and designers are permitted to work on projects undertaken by practices because the services of the firm are supervised by an Architect. This framework enables individuals to gain experience, develop competencies, and actively participate in the profession well before achieving licensure. This approach contrasts with the single-tier regulatory models common in other professions governed by FARPACTA, where practice rights are directly and exclusively tied to individual licensure.

For instance, in law, only lawyers or paralegals may provide legal services to the public, except as expressly permitted through bylaws. Similarly, in medicine, only fully licensed physicians may practise independently, while medical residents operate under tightly controlled training programs. In engineering, unlicensed individuals may not assume independent responsibility for engineering work, even when supervised. In these professions, professional liability insurance typically rests with the individual, and core duties are reserved exclusively for those fully credentialed. In contrast, Ontario's architectural framework supports a more inclusive and flexible model that maintains public protection through firm-level accountability and supervision rather than solely through individual licensure.

The architectural profession offers a wide range of opportunities for individuals to contribute meaningfully while pursuing licensure—or even without intending to become licensed. Beyond employment in practices operating under a CoP, individuals may work in architectural departments of universities, hospitals, municipalities, or in capital projects divisions of large private organizations such as banks and retailers. These roles often involve project management, technical coordination, and design development, typically under the oversight of an Architect or in contexts requiring architectural judgment.

Further, the *Architects Act* permits unlicensed individuals to hold up to 49% ownership in a CoP, enabling non-Architects or those pursuing licensure to participate in the leadership, management, and financial direction of architectural practices. This level of senior involvement prior to licensure is uncommon in other regulated professions



in Ontario, where licensure is usually a strict prerequisite not only for service provision, but also for employment in professional roles, practice ownership, or organizational leadership. Additionally, statutory exceptions under Section 11(3) of the *Architects Act* allow certain categories of design work to be undertaken independently by individuals holding a Building Code Identification Number (BCIN) issued by the Ministry of Municipal Affairs and Housing (MMAH). Together, these elements create a regulatory ecosystem that supports diverse and sustained participation in the profession and alleviates pressure to achieve licensure within narrow timelines.

The two-tier framework also reflects the inherently team-based nature of architectural practice. Unlike other regulated professions where services are predominantly delivered by individual practitioners (such as physicians or lawyers), architectural projects rely on multidisciplinary collaboration among Architects, Intern Architects, architectural technologists, project managers, engineers, planners, and administrative staff. The framework acknowledges that while Architects retain accountability and oversight responsibilities, meaningful contributions occur at multiple levels within a practice.

By tying professional liability insurance and service provision to the firm rather than the individual, the system allows architectural practices to function as coordinated teams while maintaining clear regulatory responsibility. This structure mirrors how architectural services are delivered in reality; it also ensures supervision and quality assurance are embedded within organizations, thereby protecting the public interest while enabling broad participation.

Registration timelines can serve as useful tools to assess fairness across regulated professions, but it is important to recognize Ontario's architectural profession differs significantly from many others governed by FARPACTA. In the OAA's context, longer registration timelines may not necessarily indicate barriers or inefficiencies, but rather reflect the flexibility embedded in the regulatory framework, including the two-tier system and statutory exceptions under Section 11(3). These provisions allow both licensed and unlicensed individuals to engage meaningfully in architectural practice, gain experience, participate in the workforce, and offer certain design services without pressure to expedite formal licensure. Consequently, licensure timelines in architecture are not always a direct measure of access or opportunity. The system supports varied career pathways that do not immediately require licensure.

Many individuals in the Internship in Architecture Program remain in that category for extended periods—sometimes by choice, due to family obligations, career stage, or financial considerations. Others may choose not to pursue full licensure at all, especially if they are content working on projects permitted under Section 11(3) or as part of a practice or organization where they are not required to have a licence to do the work. In this sense, long licensure timelines may indicate flexibility and accessibility rather than regulatory barriers. The architectural model therefore offers a more nuanced, inclusive, and practical approach to workforce integration. It supports the participation of internationally educated professionals, part-time workers, and others whose circumstances do not align with the rigid licensure pathways found in other regulated professions.

**Parallel Processing:** The data indicates there are no systemic bottlenecks or delays in the review and approval process of IAP experience submissions. Opportunities for streamlining and improving reported timelines may exist through targeted enhancements, such as strengthened guidance, further automated reminders, or database updates to manage inactive drafts.

Research regarding the registration experience of internationally educated individuals indicates consistent acknowledgement of pre-IAP international experience and confirms potential acceleration of registration. Council may wish to consider opportunities for additional communication or resources to bring awareness to the ERC route or clarify when it is beneficial.



## Examination

Under the Internship in Architecture Program, individuals seeking licensure with the OAA must complete 2,800 hours of experience before becoming eligible to write the ExAC. While this may appear at first glance to be a sequential requirement—experience followed by examination—the practical operation of the licensing process reflects a concurrent approach.

Intern Architects continue to gain and report experience hours while preparing for and writing the examination. In fact, the competencies tested on the ExAC are developed throughout the internship period, and the professional progression of candidates is interwoven with exam readiness. The requirement to complete 2,800 hours before becoming eligible to sit for the ExAC is a milestone rather than a bottleneck, and it does not prevent or delay other parts of the licensing journey from progressing in parallel.

This is supported by over a decade of empirical data. Between 2014 and 2024, the OAA’s ExAC participation rate has remained stable, with an average of 17.61% of Intern Architects sitting the exam each year and a standard deviation of only 1.81%. This consistency, even during pandemic years, demonstrates Intern Architects are moving through the system without systemic delays or artificial gatekeeping. Moreover, the participation rate has recently increased to its highest point (20.29% in 2024), further confirming the licensing system is functioning smoothly and efficiently.

Year	Exam Registrants	Total Intern Architects	Participation Rate	
2014	259	1476	17.55%	
2015	292	1512	19.31%	
2016	263	1531	17.18%	
2017	258	1588	16.25%	
2018	285	1656	17.21%	
2019	333	1716	19.41%	
2020	327	1830	17.87%	
2021	334	1970	16.95%	
2022	264	1949	13.55%	
2023	362	1991	18.18%	
2024	407	2006	20.29%	
			1.81%	Standard Deviation
			17.61%	Average Participation Rate

In addition to the ExAC, the OAA recognizes the Architect Registration Examination NCARB in the United States as an acceptable alternative exam under the *Architects Act*. The ARE is available online and on-demand, offering significant flexibility in terms of timing and accessibility. Intern Architects may choose this route if it better aligns with their individual schedules or personal circumstances. While the OAA does not promote one exam over the other, increasing awareness of the ARE as an option—particularly its format and availability—could further support concurrent progression by helping individuals make informed decisions suited to their needs.

Looking ahead, national efforts are already underway to enhance concurrency further. Through ROAC, the ExAC is currently undergoing a modernization review. Consultants have been engaged to develop proposals that include moving



the exam online—a shift that may increase its availability and flexibility. While this work is expected to take a few years, it reflects a shared commitment across Canadian architectural regulators to improve the examination process.

### Internationally Educated Individuals: Examination Acceleration

The OAA has analyzed the examination experiences of internationally educated individuals who had architectural experience prior to enrolling in the IAP. While a significant proportion of newly licensed members each year are internationally educated, only a minority log prior architectural experience into the program. For those who did, a review of the past five years of registration data shows that all were entitled to apply this experience to accelerate their examination timelines.

	2020	2021	2022	2023	2024
Individuals licensed via the IAP	180	209	245	185	222
Individuals licensed via IAP with International Academic Origin	65	77	77	78	81
Individuals with international experience gained prior to enrolment in IAP	11	17	10	10	13

- In 2024, 12 of the 13 individuals used their prior international experience to be register for the ExAC.
- In 2023, five of the 10 individuals used their prior international experience to be register for the ExAC.
- In 2022, seven of the 10 individuals used their prior international experience to be register the ExAC (one of the 10 undertook the ARE in the United States).
- In 2021, 16 of the 17 individuals used their prior international experience to register for the ExAC (the remaining individual undertook the ARE).
- In 2020, 10 of the 11 individuals used their prior international experience to be register for the ExAC (the remaining individual undertook the ARE).

For 62 internationally educated individuals entering the IAP in the last five years with prior architectural experience, the benefit of accelerated examination eligibility is both clear and consistently realized. In the five years examined, nearly all (i.e. 82%) were able to apply this experience to register for the ExAC, demonstrating that prior experience provides a tangible advantage by potentially shortening the registration timeline.

**Parallel Processing:** The OAA’s licensing pathway enables individuals to progress through experience and examination components in a concurrent manner. Intern Architects also have the option to sit for the AREs to avoid potential delays; the OAA can bring more awareness of this choice via its website and social media communications.

**Opportunity:** The OAA plans to support the ROAC’s research and development of the modernization of the ExAC.



## Further Consideration

Opportunities for Intern Architects to write the licensing exam without sufficient practical experience may raise concerns for which the FARPACTA requires regulators to provide information about how it will ensure an applicant has reasonably sufficient information to make an informed choice, including information about the cost of examinations, tests, and assessments, as well as the number of permissible attempts on examinations, tests, and assessments.

The OAA webpage dedicated to examinations currently directs individuals to the ExAC website for detailed information on eligibility, retaking, costs, and accommodations. However, should the Association decide to increase awareness of the AREs and/or should the ExAC modernization increase the availability of the examination, transparent information should be provided to support informed choices. As an example, the website and literature could provide content as follows:

*The exams are designed to assess knowledge that is reinforced through real-world application. This means taking them too early could undermine the intended learning process. The exam's structure and content assume meaningful exposure to all categories of required architectural experience. Many regulatory bodies structure professional exams to be taken alongside significant work experience because application-based questions require a mix of theoretical knowledge and hands-on understanding. Accordingly, individuals are strongly encouraged to assess whether they have had sufficient practical experience across all required categories before proceeding. Attempting the exam prematurely may result in unsuccessful outcomes, leading to additional costs, delays, and frustration.*

## OAA Admission Course

The online OAA Admission Course is a mandatory requirement for licensure in Ontario. A series of lectures on topics related to the practice of architecture in Ontario, it is taught by Architects, lawyers, and other professionals with special expertise in the course content. Topics include professionalism, regulatory requirements, Ontario's Building Code, planning and development approvals, contracts, and contract administration.

Time spent taking the course may be logged toward the experience requirements. The OAA Admission Course hours are approved on a straight time basis for experience credit and the distribution per subject relevant to the experience categories will be issued to Intern Architects at the time of attendance.



**OAA Admission Course Report**

**Completion**

Year	Start Date	End Date	Registered	Course Max.	Partial or Incomplete	Full or Complete
2019	14/Jan/2019	17/Mar/2019	77	100	0	77
2019	13/May/2019	17/Jul/2019	84	100	2	82
2019	23/Apr/2018	24/Jun/2018	62	100	4	58
2020	14/Oct/2019	15/Dec/2019	54	100	0	54
2020	13/Jan/2020	15/Mar/2020	100	100	0	100
2020	05/Oct/2020	06/Dec/2020	82	100	3	79
2021	11/Jan/2021	14/Mar/2021	63	100	1	62
2021	05/Apr/2021	13/Jun/2021	89	100	1	88
2021	06/Apr/2020	17/Jun/2020	77	100	0	77
2022	04/Oct/2021	05/Dec/2021	93	100	4	89
2022	10/Jan/2022	13/Mar/2022	66	100	1	65
2022	04/Apr/2022	05/Jun/2022	69	100	1	68
2023	03/Oct/2022	04/Dec/2022	93	100	1	92
2023	09/Jan/2023	12/Mar/2023	99	100	1	98
2023	03/Apr/2023	04/Jun/2023	101	101	1	100
2024	02/Oct/2023	03/Dec/2023	76	150	1	75
2024	08/Jan/2024	10/Mar/2024	173	175	0	173
2024	01/Apr/2024	02/Jun/2024	119	150	2	117

Over the period analyzed, course enrolment has shown steady growth, reaching a peak of 368 registrants across three sections in 2023/24. Earlier years (i.e. 2019–2020) saw smaller sections, generally under 100 participants, while recent years reflect higher and more consistent enrolments, with some sections exceeding 170. Completion rates are exceptionally high, with approximately 98% of registrants finishing the course, highlighting strong engagement and retention. Course capacity has expanded over time, from typical maximums around 100 to as high as 150 to 175 per section, demonstrating the OAA’s responsiveness to growing demand. While some variability in section enrolment occurs, winter sections historically tended to attract more participants, though both terms now show robust participation. Partial or incomplete registrations remain rare.

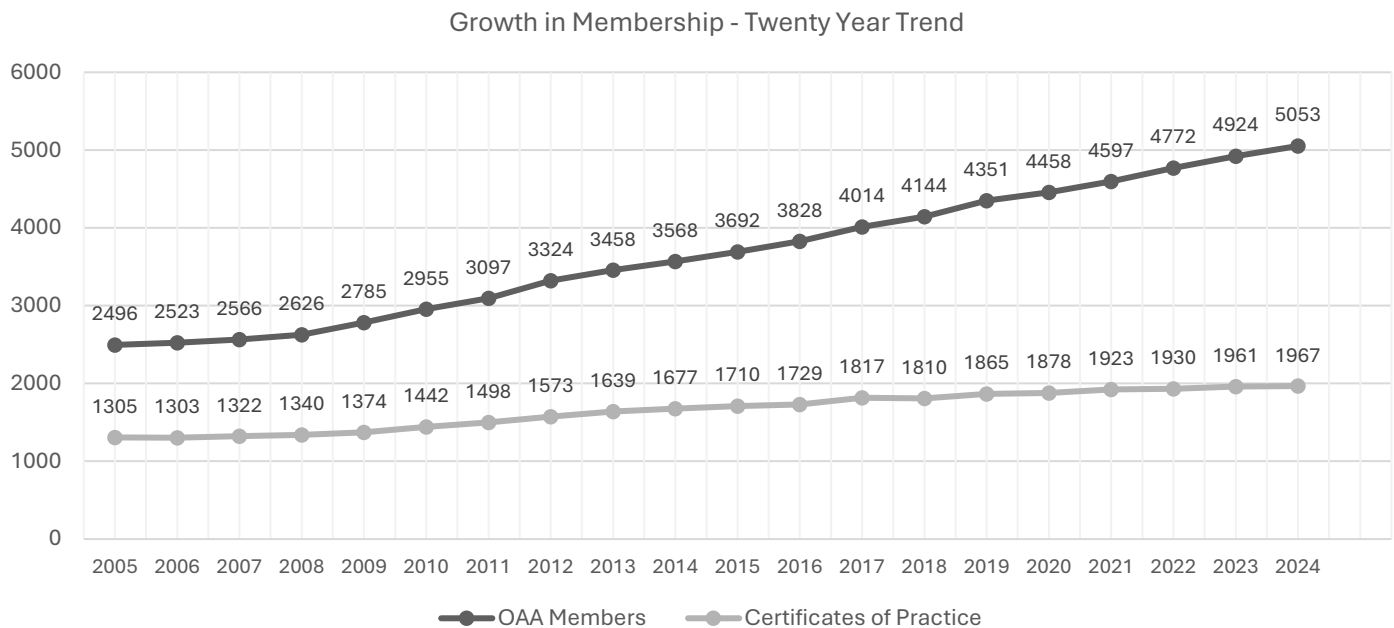
Importantly, the data indicate there are no systemic bottlenecks or delays in participation or course completion. High completion rates and responsive capacity adjustments suggest that registrants can move through courses efficiently. Many sections operate at or near full capacity, reflecting strong interest and engagement, and highlighting potential opportunities to expand resources or sections in peak periods.



There is an opportunity to provide greater clarity and reduce potential delays by confirming in Appendix B that successful completion of the Course, even if undertaken while OAA status is lapsed or otherwise inactive, would still count toward licensure qualifications. In such cases, a three-year period could be considered, aligning with other currency requirements. Providing this clarity in OAA resources would minimize confusion regarding course credit and the achievement of its learning outcomes.

**Parallel Processing Opportunities:** OAA Council may wish to consider researching the need for course capacity and removing any registration caps. Council may also wish to consider review and clarification of OAA Appendix B as it relates to course completion and OAA status.

### Registration Decisions



An analysis of registrant data from 2005 to 2024 reveals a consistent and sustained upward trend in the number of licensed members, with the total more than doubling over the 20-year period—from 2,496 in 2005 to 5,053 in 2024. The average annual growth rate over this period is approximately 3.8%, with a low standard deviation of 1.6%, indicating stable and predictable year-over-year increases. Notably, there are no years in which the number of registrants declined, including during periods of broader economic disruption such as the 2008 financial crisis or the COVID-19 pandemic.

This consistency suggests the licensing process has remained resilient and that no systemic delays or bottlenecks are evident at the registration stage. The past five years have seen a slightly accelerated rate of growth, which may reflect increased demand or improved throughput, but there is no indication this growth has outpaced the system's capacity to assess and register new applicants. Based on registration data, there are no apparent constraints or significant points of delay that have impacted the year-over-year registration processes. Further, the OAA consistently meets the registration decision time requirements of FARPACTA.



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## Analysis: Limited Licence

The OAA's consideration of parallel processing opportunities takes into account the recent introduction of the OAA Technology Program, which launched in January 2025. Given the recency of this program, there is not yet sufficient data available to support a reliable, evidence-based interpretation or analysis of registrant experiences specific to this pathway. As such, it is premature to draw definitive conclusions about timelines, bottlenecks, or the potential for concurrent processing within this new program stream.

While the OAA cannot yet provide program-specific data analysis, it can reasonably anticipate that lessons learned from long-standing registration practices will be transferrable and instructive. Building on these lessons, this report puts forward proposals for parallel processing grounded in the OAA's analysis of the registration practices for licence. These proposals are intended to serve as a foundation, which will then be tested and adapted as the OTP matures and sufficient evidence becomes available. The OAA will continue to monitor the implementation of the program, gather relevant metrics, and reassess its approach as more registrant data becomes available.

### Academic Qualifications

Academic qualifications are confirmed by an individual's educational institution; copies of the official transcript and diploma are sent directly to the OAA. At this time, there is no evidence of institutional delay as the certified records are either sent directly from the post-secondary institution or procured via an online portal and shared digitally with the OAA. It is possible a delay could occur where an individual does not request their records in a timely manner. In these circumstances, OAA staff arrange for scheduled reminders.

Prior to completing their academic qualifications, individuals can gain experience that may be used towards their experience requirements for limited licence. Specifically, 1,940 hours of eligible retroactive experience may be submitted for review and approval. This provision supports parallel processing by allowing Interns to log relevant experience hours while still completing their academic qualifications.

### OTP Experience Submissions

Based on the research of IAP, the most significant delays occur at Intern-dependent stages while the Supervising Professional, Mentor, and OAA Approval stages show efficient turnaround times. Bearing this in mind, Council may wish to consider similar targeted enhancements, such as strengthened guidance, further automated reminders, or database updates to manage inactive drafts.

Much like the IAP, the OTP also provides for "Observer or Parallel Experience." The opportunity for Interns to gain essential experience outside their place of employment through observer or parallel documents experience. This provision is designed to support Interns who may face barriers in accessing the full range of required experience within their workplace.

### OAA Admission Course

The OTP requires Intern Technologists be enrolled in the OTP for a minimum of 12 months and have completed at least 2,790 approved hours of work experience. The Admission Course is a standalone requirement dedicated to topics related to the practice of architecture in Ontario as taught by Architects, lawyers, and other professionals with special expertise in the course content. Topics include professionalism, regulatory requirements, Ontario's Building Code, planning and



development approvals, contracts, and contract administration. Although Interns may benefit from taking the course later in their internship to appreciate the practical applicability of the content, there is no evidence to suggest the course could not be taken at any time and be counted toward the requirement for licensure. There is no such prerequisite required in the IAP.

**Parallel Processing Opportunity:** OAA Council may wish to consider removing the prerequisite requirements within the OTP for Intern Technologists intending to complete the OAA Admission Course.

### OTP Examination

Under the OAA Technology Program, individuals seeking to write its examination to become a Licensed Technologists must first complete the OAA Admission Course, which has a prerequisite requirement of 12 months of program enrolment and at least 2,790 approved hours of work experience. In consideration of the above information regarding the Admission Course and in alignment with the IAP, Council may wish to consider revising the exam eligibility to a quantum of completed experience hours. For example, one option would be to remove the requirement for Admission Course completion and enrolment time in the program while maintaining the requirement for 2,790 hours of approved experience to be able to sit for the exam.

Although keeping the experience threshold may appear to be a sequential requirement—experience followed by examination—the practical operation of the licensing process reflects a concurrent approach. Intern Technologists continue to gain and report experience hours while preparing for and writing the examination. The competencies tested on the exam are developed throughout the internship period, and the professional progression of candidates is interwoven with exam readiness. As mentioned previously in the context of the path to licence, the requirement to complete 2,790 hours before becoming eligible to sit for the exam is a milestone rather than a bottleneck; further, it does not prevent or delay other parts of the licensing journey from progressing in parallel.

The Licensed Technologist examination is based on the documents, procedures, and practices used while the program was administered by the Ontario Association for Applied Architectural Sciences (OAAAS). The OAA, having recently assumed the administration of the program, may wish to consider dedicating time and resources to a consultative review of the examination, which would include modernization options.

**Parallel Processing Opportunity:** OAA Council may wish to consider removing the Admission Course prerequisite and its inherent time and experience requirements and simplify exam eligibility to a quantum of approved experience hours.

OAA Council may consider dedicating resources to research and development of the modernization of the Licensed Technologist examination.



# FARPACTA CHECKLIST

Regulators are invited to use the following checklist to work through the specific legal obligations contained in the Act and its regulation. By applying this checklist, regulators will help ensure their plans comply with the law.

Checklist for Translating the Legal Obligations Contained in FARPACTA and its Regulation into the Parallel Processing Plan	
Nature of Obligation	Addressed in Plan Yes/No
<p><i>FARPACTA, section 12.2:</i></p> <p>1) <i>A regulated profession shall have a plan addressing how it will enable multiple registration processes to take place concurrently.</i></p> <p>2) <i>The plan must,</i></p> <p style="padding-left: 40px;"><i>a. permit applicants who experience a delay in one part of the registration process to proceed with other parts of the registration process wherever possible</i></p> <p><b>Required:</b> The plan must describe how the regulated profession will enable its registration processes to take place concurrently, where feasible, including where there are delays.</p> <p><b>Best practice (optional):</b> To establish a context, the plan could describe sources of delay that the regulator has identified in the registration process and outline opportunities to address these barriers by allowing multiple registration steps to take place at the same time.</p>	<p>Opportunities identified.</p>



<p><i>Regulation, section 4.2:</i>  <i>A regulated profession's plan referred to in subsection 12.2 (1) of the Act respecting concurrent registration processes must include</i></p> <p>a) <i>steps that set out how the regulated profession will enable registration processes to take place concurrently, where feasible, including when there are delays;</i></p> <p>b) <i>information about the circumstances in which the regulated profession will allow an applicant to choose whether to have different parts of their registration processes occur sequentially or concurrently;</i></p> <p><b>Required:</b> How the regulated profession will allow multiple registration steps to take place and the same time, where feasible, including where there are delays, and when it will allow an applicant to choose sequential of concurrent processing.  The plan must also specify the circumstances in which the regulated profession will allow an applicant to choose whether to pursue different parts of their registration processes sequentially or concurrently.</p> <p><b>Best practice (optional):</b> The regulator may wish to include implementation steps with associated timelines.</p>	<p>Implementation opportunities identified.</p>
<p><i>Regulation, section 4.2:</i>  <i>A regulated profession's plan referred to in subsection 12.2 (1) of the Act respecting concurrent registration processes must include:</i></p> <p>c) <i>information about how the regulated profession will ensure that an applicant has reasonably sufficient information to allow the applicant to make an informed choice under clause (b), including information about the cost of examinations, tests and assessments and the number of permissible attempts on examinations, tests and assessments.</i></p> <p><b>Required:</b> How a regulated profession will ensure that it provides an applicant with reasonably sufficient information to allow the applicant to make an informed choice under clause (b) above including information about the cost of examinations, tests and assessments and the number of permissible attempts on examinations, tests and assessments.</p> <p><b>Best practice (optional):</b> To support confidence that information will reach applicants, the plan could include a communications plan with milestones and timelines for making information available to applicants.</p>	<p>All adopted changes would have a dedicated communication plan.</p>

