

Fair Registration Practices Report – Prepared for the Office of the Fairness Commissioner (OFC)

Updated 2023

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Section 1 - Background

Under Section 20 of the [Fair Access to Regulated Professions and Compulsory Trades Act](#), 2006 (FARPACTA), which is substantially similar to section 22.7(1) of Schedule 2 of the [Regulated Health Professions Act](#), 1991 (RHPA),

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 23 of FARPACTA and Section 22.9 of Schedule 2 of the RHPA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its 2023 Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2023.

The FRP:

- Collects information about the organization, applicants to the profession, and current membership;
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period;
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices;
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants; and
- Identifies trends across regulated professions and regulated health colleges.

Please note that the 2023 version of the FRP has changed from the previous version in terms of both form and content as the OFC's enabling statutes have evolved and as the office migrates to a more permanent portal-enabled database solution.

Section 2 - Organizational Information

Organization name	Ontario Association of Architects
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Section 3 - Registration Requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practise their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by Ontario Association of Architects.

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Architect
Academic requirement	<p>Section 31(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>Section 31(2): The person must hold a Certificate of Certification issued by the Canadian Architectural Certification Board (CACB).</p>

Experience requirement	<p>Section 31(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 (IAP) 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>Section 31(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>
Language requirement	None prescribed by the regulations under the <i>Architects Act</i> .
Additional information on licensing requirements (may include links to appropriate page on regulator website):	<p>Section 31(3): The person must have completed the Admission Course offered by the Association.</p> <p>Section 31(4): The person must have successfully completed one of the following:</p> <ul style="list-style-type: none"> - the Examination for Architects in Canada (ExAC) published by the Association; - the Architect Registration Examination (ARE) of the National Council of Architectural Registration Boards (NCARB); or - any combination of the components of the ExAC and of the ARE that, considered as a whole, is equivalent to one of those examinations, as approved by the Council. <p>Section 31(7): The person must have completed an experience assessment provided by the Association.</p>

Section 4 – Third-Party Assessments

Third-party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
Committee for the Examinations for Architects in Canada (CExAC)	Knowledge-based exam
National Council of Architectural Registration Boards (United States)	Knowledge-based exam
Canadian Architectural Certification Board	Competency-based assessment
Canadian Architectural Certification Board	Academic credential evaluation



Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial, and fair.

The Ontario Association of Architects takes the following measure(s) to ensure fair and timely assessments:

1. The [Canadian Architectural Certification Board](#) was established in 1976 by an agreement of the [Regulatory Organizations of Architecture in Canada](#) (ROAC) (the regulators), who grant it the authority to act on their behalf in assessing the educational qualifications of individuals holding a professional degree or diploma in architecture. The CACB is governed by a Board of Directors, which establishes the policies of the CACB. The CACB procedures for certification, and the education standards against which qualifications are measured, have been developed in accordance with both the core principles of the [UNESCO/UIA Charter for Architectural Education](#) and the relevant sections of the [UIA Accord on Recommended International Standards on Professionalism in Architectural Practice](#).

There are currently two members of the OAA on CACB's Board. The Board is required to meet at least twice each year. By virtue of the Bylaws, CACB is required to seek the ROAC's (including the OAA) approval for:

- publishing standards for applicant review, including the evidence to be furnished by applicants, and for recording and recognizing equivalent standards and procedures; and
- adopting and publishing procedures for the appeal of decisions of the Board or its authorized committee(s).

Further, CACB must report to the OAA on all matters relating to accreditation. Minutes of each Board meeting will be provided to the OAA in a timely manner.

2. The [Committee for the Examination of Architects in Canada](#) oversees and maintains the ExAC on behalf of ROAC. It comprises regional representatives who are appointed by their respective Councils. All matters from CExAC are regularly reported and reviewed; they require approval by all Canadian jurisdictions. Coordination of the Committee and its secretariat are provided jointly by the OAA and the [ordre des architectes du Québec](#) (OAQ). The Committee prepares technical and statistical reports that are updated annually.

Section 5 - Accomplishments, Risks, and Mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1. Working with the Ministry of the Attorney General (MAG), the OAA proposed an amendment to regulation under the *Architects Act* to provide an alternative to direct Canadian experience. Namely, if an applicant has less than 940 hours of Canadian architectural experience of the 3,720 hours of experience required by the IAP, they must successfully complete an online, on-demand course. The course is offered at one-third the cost for Intern Architects. This amendment received Royal Assent in February 2024.
2. Nationally, ROAC, through its International Mobility Committee, has a draft MRA agreement with the United Kingdom that will facilitate licence for licence reciprocity between the two countries. The agreement is not yet finalized, but it is anticipated to move quickly to ratification.
3. Via ROAC's ExAC Review Working Group, a subject-matter expert (SME) consultant was hired to conduct an ExAC Review & Modernization Project assessment. In October 2023, this assessment report was completed and received. The ROAC Board of Directors resolved that the working group continue to review all recommendations and present to the Board in the spring of 2024 a matrix of assessment recommendations. The recommendations



not only include items related to the continuous improvement of the national examination, but also modernization of the examination.

4. Working with the Ministry of the Attorney General, the *Architects Act* has been amended to provide the OAA authorization to issue limited licences. The associated regulation amendments are currently being considered by government. In the interim, the OAA is working to put into place registration procedures that are fair, impartial, objective, and transparent.
5. The OAA has been modernizing and adapting new technologies for the benefit of participants in the Internship in Architecture Program. In 2023, the OAA developed and introduced a new in-house online Canadian Experience Record Book (CERB) portal. By bringing the portal in-house, data and registration information will reside within the OAA's database, which will provide an integral and efficient interface for Intern Architects, Student Associates, Supervising Architects, and Mentors. This development will also assist with data collection and reporting. The new portal was launched in October 2023.

B. Risks and Mitigations

Risk	Mitigation Measure
Reduced participation by volunteers to statutory committees.	Traditionally, the OAA relies on a broad call for volunteers to all committees via the <i>OAA News</i> e-newsletter, website, and other social platforms. The OAA's mitigation measure was to generate direct outreach to members soliciting expressions of interest as required. This results in a much greater volunteer response rate.
Cyber Security	The OAA has undertaken additional cyber security upgrades to protect data and possibility of breaches.

Section 6 - Changes to Registration Practices

During the January 1 to December 31, 2023 reporting period, the Ontario Association of Architects has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration Requirements and Practices

Registration process	Changes Made	Description
Registration requirements either through regulation, bylaw, or policy	Yes	<p>Since 2003, the Ontario Association for Applied Architectural Sciences (OAAAS) administered a program through which college graduates in the architectural industry could receive certification that facilitated their ability to apply for licence with the OAA. Starting in June 2022, the OAAAS was sunset and the administration of the program proceeded to be integrated into the operations and administered by the OAA.</p> <p>In the fall of that year, the Association of Architectural Technologists Ontario (AATO) advanced a court application challenging the OAA's authority to issue licences to individuals certified by the program. In May 2023, the program was paused so that the OAA could seek amendments to the <i>Architects Act</i> and its</p>

		<p>regulation in order to establish the program and the resultant limited licences in statute.</p> <p>In March 2024, the Amendments to the Act received Royal Assent and the regulations are currently under review with the government. The OAA acknowledges the impact to individuals enrolled in the program and to those who had been licensed through the program. Through 2023 and into 2024, the OAA prioritized time and resources to establish the program in statute and relaunch this path to licensure. The OAA has maintained continuous information sharing with stakeholders through regulatory notices, direct emails, bulletins, and a virtual information session. An OAA Website page was also created and regularly updated as a resource for stakeholders and the public.</p>
		<p>The Internship in Architecture Program prescribes acceptable employment situations and architectural experience expectations. However, the OAA recognizes there may be circumstances where an Intern Architect has exhausted all options within their place of employment and is unable to find opportunities to obtain certain outstanding experience hours.</p> <p>Early in 2023, the OAA expanded its "Observer or Parallel Documents Experience" provision to include experience gained outside an Intern Architect's place of employment. The OAA's Appendix B sets out the rules and requirements around this type of experience but the change represents expanded possibilities for Intern Architects to fulfil their licensure requirements.</p>
New or consolidated class of certificates or licenses.	Yes	Throughout 2023, the OAA worked closely with the Ministry of the Attorney General to establish a limited licence class in statute. This work is ongoing into 2024.
Assessment of qualifications, including competency-based assessments and examinations	Yes	During 2023, the OAA worked to develop a new requirement within Appendix B to the Internship in Architecture Program. Historically, the OAA has relied on six months of direct experience on projects located in Ontario under the supervision of an OAA architect in order that Intern Architects gain local architectural practice competency. In response to the FARPACTA amendments, the OAA removed this requirement. In its place, the OAA developed a self-assessment for Intern Architects to specify and validate that certain key practice competencies were gained as they completed their IAP experience record book. The self-assessment can be completed and tracked as Intern Architects complete the experience requirements of the IAP. Developed through 2023, the requirement came into force in early 2024 and has a transition period until the end of 2024.
Documentation requirements for registration	No	
Timelines for registration, decisions, and/or responses	Yes	Creation of OAA database tracking system for application timelines and other state related to application status.
Registration and/or assessment fees	Yes	OAA fees were increased by 1% for 2023.

Changes to internal review or appeal process	No	
Access by applicants to their records	Yes	The new online CERB portal for Intern Architects and Student Associates now provides ability to upload certain forms via the portal, access the status of previous/current experience submissions, view graphic displays for experience submissions, view currency of experience calculator, and track other CERB items.

B. Training, Policy and Applicant Supports

Registration process	Changes Made	Description
Training and resources for staff who deal with registration issues	Yes	<p>The new online CERB portal for the Internship in Architecture Program incorporated several enhanced features for staff:</p> <ul style="list-style-type: none"> - an “add PAF” (periodic assessment form) feature wherein staff enters the CERB pdf information and merges the data in the graphical display of occupancy type, project type, and geographical distribution pie chart within the online CERB; - ability to upload a CERB pdf and supporting documentation for review by the OAA Review Architect; - incorporated reports for statistical purposes; and - ability to search submissions via status type.
		Staff participated in OAA presentations to the Toronto Society of Architects (TSA) and JVS Canada regarding the path to licensure for newcomers and internationally educated individuals. These sessions are for information sharing and also provide opportunity to increase staff awareness regarding licensure challenges.
		Staff has begun discussions with Build ON, which is a pre-arrival service funded by Immigration, Refugees, and Citizenship Canada (IRCC) in order to share information and schedule OAA presentations. Similarly, there have been discussions with Newcomer Centre of Peel (NCP), which is a multi-service agency that assists newcomers in achieving settlement (NCP is also funded by IRCC).

Resources or training to support applicants to move through the licensing process	Yes	<p>The new online CERB portal for Intern Architects and Student Associates incorporated new features to enhance user experience, such as</p> <ul style="list-style-type: none"> - ability to upload student declaration form, employment confirmation form, mentor confirmation form via portal; - Supervising Architects and Mentors can view their respective Intern Architects/Student Associates (past and present) who they supervise/mentor; - automated email notifications are sent to the Intern Architect/Student Associate regarding the change of status of the online submission; - incorporated graphical display of occupancy-type distribution, geographical distribution, and project-type distribution on user side; - incorporated a currency of experience calculation on user side; and - Supervising Architects and Mentors can view the status of previous/current experience submissions.
		Updated Internship in Architecture Program Mentorship Guide available in PDF via the OAA website.
		Within Intern Architect and Student Associate application interface, the ability to upload CACB certification has been incorporated.
		Refreshed the Student Associate/Intern Architect/IAP pages of the OAA Website so information is easier to find and navigate.
		The online Mentor Directory was developed and launched within the OAA Website (early 2023), allowing individuals to search for a compatible Mentor using information related to a Mentor's practice, experience, and background.
		Created a new graphic diagram to display the licensure process in Ontario on the OAA Website.
		The CACB is currently testing the Broadly Experienced Foreign Architect (BEFA) Mentorship Program, developed by the ROAC Standing Committee with funding from Employment and Social Development Canada (ESDC). The ROAC Standing Committee has also developed instructional videos for mentors and mentees as part of the same initiative. The Pilot Phase of the BEFA Mentorship Program is to prepare for the implementation in 2025, in accordance with the impact assessment requirements developed by the CACB.
Anti-racism and inclusion-based policies and practices	Yes	<p>The OAA's five-year strategic plan includes the Association's commitment to address two very important environmental and social governance themes over the next five years (to 2027): Climate Action and Equity, Diversity, and Inclusion. These will act as lenses through which the OAA's work and policies will be viewed in order to ensure it positively aligns with the principles. Work in this space is evergreen; this includes ensuring the architecture profession of today and tomorrow reflects the diversity of the Ontarians it serves. To this end, it is critical both the path to licensure and the environments in which architects practise are equitable and inclusive, and include a diversity of voices</p>

		<p>and perspectives to strengthen the capacity for architecture and the allied arts to create spaces for the public.</p> <p>All of the 40 actions items stemming from the OAA's Truth & Reconciliation/EDI Working Group report of 2022 have been addressed and are now in play.</p> <p>In the fall of 2023, the OAA hosted a Best Practices for Architectural Firms: Summary of Equity, Diversity & Inclusion Roundtable . On December 6, 2023, EmpoweredEDI Inc. conducted general training on EDI definitions and best practices.</p>
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C. System Partners

Registration process	Changes Made	Description
Steps to increase accountability of third-party service provider(s)	No	
Accreditation of educational programs	Yes	<p>The CACB is one of the 10 signatories of the Canberra Accord, which consists of accrediting organizations that have substantial equivalent established accreditation systems for architectural education. The CACB recently hosted its third periodic review and will receive the outcome of the visit at the Canberra Accord Signatories Interim Meeting on June 27–28, 2024. Implementation of the Accord means international mobility of the signatories' graduates and the portability of their educational credentials. Signatories are expected to develop a process that will facilitate the graduates' mobility. The CACB has developed its implementation process through a specific assessment stream for Canberra Graduates since 2012. The Conditions and the Procedures for Accreditation Writing Committee has started the consultation process to update the accreditation document (last updated in 2017) by forwarding to the Canadian Council of University Schools of Architecture (CCUSA) and the ROAC Standing Committee, on behalf of the ROAC, for their review and feedback the draft 2024 Conditions for Accreditation. The Members and the Board's approvals are planned by 2024, while the implementation will be scheduled for the 2026 Accreditation Cycle.</p>
Mutual recognition agreements (MRAs)	Yes	<p>Following discussions with NCARB regarding the MRA between Canada and the United States, the OAA will be removing the citizenship/residency restriction that had been in place. Historically, an architect applying from the United States was required to be a U.S. citizen or permanent resident; similarly, an architect applying from Canada needed to be a citizen or permanent resident of Canada. An applicant now only needs to be a citizen or permanent resident of either country to avail themselves of the agreement (assuming all other eligibility requirements have been met). A meeting of the Tri-National Agreement Monitoring Committee was held in November 2023. This is the committee that oversees the Canada/United States/Mexico MRA. Positive changes were agreed to as a result to remove barriers, including reducing the number of years of experience required to be eligible as well as</p>

		allowing experience to be gained in any one of the three countries. Permanent options for online interviews/assessment was also recommended. They changes are moving through the approval process for each country and expected to be implemented in 2024.
		The Canada–European Union MRA remains with government awaiting final ratification.
		The Canada–United Kingdom MRA has been drafted and is under review.

D. Responsiveness to Changes in the Regulatory Environment

Registration process	Changes Made	Description
Emergency registration plans	No	
Technological or digital improvements	Yes	Please see previous comments regarding the new online CERB for Internship in Architecture Program participants, as well as upgraded cyber-security comments.
Steps to address labour shortages in the profession or trade	Yes	It is challenging to tie the OAA licensing statistics to any Ontario growth Index because unlicensed individuals are able to either offer services in a restricted scope of work or practise under the supervision of an architect. However, over a 10-year period (2013 to 2023), the number of licences issued by the OAA per year has increased by 51%. Within that same data set, the numbers of internationally educated individuals licensed per year has steadily increased. In 2013, 20% of individuals licensed were internationally educated, which has grown over 10 years to be 34% of individuals licensed in 2023.
Other	No	

Section 7 - Membership and Application Data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator's membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based Data Collected? (Yes or No)
Members	Yes
Applicants	No
Additional Description:	

In 2020, OAA Council agreed to implement a long-term data collection strategy through an annual demographics survey of its members and others with Association status. This survey gathers race-based and other equity-relevant data to provide a baseline for measuring progress as the Association works to better ensure equity, diversity, and inclusion (EDI) in the architecture profession, as well as to develop relevant programs and initiatives. To learn more about the survey, and see results from its first few years, visit the [OAA Website](#). As the OAA continues its focus on equity, inclusion, and diversity under the five-year Strategic Plan, this data will continue to be an important piece of information in the further development of programs and policies (see previous notes on Roundtables and training provided Fall 2023).

B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes
Additional Description:	
In addition to the OAA Demographic surveys noted in question 2, licence applications request applicants to identify as "Woman," "Man," "Non Binary," or "Prefer not to Answer..	

C. Languages of service provision

The Ontario Association of Architects makes application materials and information available to applicants in the following languages.

Language	Yes or No
English	Yes
French	Yes
Other (please specify)	The Internship in Architecture Program documents are available in English and French. For any live statutory committee assessments or hearings, translators are available upon request.

D. Membership Profile

Profession Name	Total Number of Members	
Architect	4,924	
Class of Licence	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	4,924	1,048

Gender	Number of Members
Male	3,233
Female	1,686
X (includes trans, non-binary, and two-spirit people)	2
Other/not collected	3
Jurisdiction of Initial Training	Number of Members
Ontario	2,297
Other provinces and territories	919
United States	617
Other International	1,048
Other/not collected	43
Country of Initial Training (Academic Origin)	Number of Members
Albania	2
Algeria	3
Argentina	10
Armenia	3
Australia	4
Austria	1
Bahrain	1
Bangladesh	9
Belarus	2
Belgium	2
Bolivia	1
Bosnia and Herzegovina	17
Brazil	15
Bulgaria	14
Canada	3,259



Chile	2
China	65
Colombia	25
Croatia	1
Cuba	4
Cyprus	1
Czech Republic	5
Denmark	1
Ecuador	3
Egypt	73
El Salvador	1
Ethiopia	3
France	16
Germany	14
Greece	1
Hungary	1
India	98
Indonesia	1
Iran, Islamic Republic of	191
Iraq	31
Ireland	8
Israel	8
Italy	8
Jamaica	1
Japan	3
Jordan	23
Kenya	2
South Korea	5
Lebanon	25

North Macedonia	5
Malaysia	1
Mexico	11
Morocco	1
Nepal	1
Netherlands	7
New Zealand	3
Nicaragua	1
Nigeria	6
Pakistan	17
Palestine State	1
Peru	2
Philippines	26
Poland	40
Portugal	4
Romania	29
Russia	16
Serbia	13
Slovakia	2
South Africa	10
Spain	7
Sri Lanka	6
Sudan	5
Sweden	2
Switzerland	2
Syria	19
Tunisia	1
Turkey	6
Ukraine	14

United Arab Emirates	7
United Kingdom	66
United States	618
Uruguay	1
Venezuela	8
Vietnam	3

E. Data Notes (N/A)

F. Applicant Profile

Profession Name	Total Number of Applicants (2023)	
Architect	292	
Gender	Number of Applicants	
Male	169	
Female	121	
X(includes trans, non-binary, and two-spirit people)	1	
Other/not collected	1	
Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	73	6
Other provinces and territories	64	3
United States	51	3
Other International	101	2
Other/not collected	3	0
Country of Initial Training		Number of Applicants
Belarus		1
Brazil		1
Colombia		1

Cyprus	1
Czech Republic	1
Ecuador	1
Egypt	7
France	1
Germany	1
China	2
India	15
Iran	28
Iraq	1
Italy	1
Jordan	2
South Korea	1
Lebanon	5
North Macedonia	1
Morocco	1
Nepal	1
Canada	140
Pakistan	2
Philippines	2
Poland	1
Romania	1
Russia	2
South Africa	2
Spain	2
Sudan	2
Sweden	2
Syria	4
United Arab Emirates	2



United Kingdom	5
United States	51
Venezuela	1
Official Language Preference	Number of Members
English*	292
Racial Identity (optional)	Number of Members
Not collected	292

G. Data Notes

*Preferred language data not collected.

H. Applicant Decisions

The table below summarizes the outcome of registration decisions finalized in 2023. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	73		
Other provinces and territories	57		7
United States	42		9
Other International	101		
Other/ Not collected	3		

I. New Registrants

During the 2023 reporting year, Ontario Association of ARCHITECTS registered a total of 292 new registrants. The breakdown of new registrants by class of registration is provided below.

Class of registration	Total new registrants by class	Number of internationally educated registrants
Full / General/ Independent Practice	266	97

J. Data Notes

B.7 - Applications are typically withdrawn if the applicant was not successful in securing an architectural project in Ontario. For example, if a practice in Alberta or Michigan was competing for a project in Ontario, but was not chosen by the Owner, they forego proceeding with the application for licence.

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An internal review or appeal involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	5	4

An external review or appeal involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals
Qualifications, knowledge, and experience merited a licence or a licence subject to terms, conditions, and limitations.	5

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants
N/A	

L. Data Notes

B.10 - The 2023 reviews/appeals noted were in relation to [Registration Committee](#) hearing requests. When an applicant does not meet the requirements for licence, they may request a hearing to demonstrate that their knowledge, qualifications, and experience merit exemption from certain licence requirements. None of the hearings in 2023 were for internationally trained or educated individuals.

Section 8 - Changes Related to New Legislative and Regulatory Requirements

By Ontario law, regulated occupations must provide registration practices that are transparent, objective, impartial, and fair. Non-health occupations are governed by the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* (FARPACTA), while health professions are governed by the *Regulated Health Professions Act, 2011* (RHPA).

In 2021, both statutes were amended to incorporate substantive provisions to:

- A. Eliminate the use of Canadian experience requirements except under prescribed circumstances.
- B. Streamline language proficiency testing requirements.
- C. Provide for the continuity of registration processes during emergency situations.
- D. Set registration time limits. (FARPACTA only)

The Ontario Association of Architects has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change Required: Changes Required

The Ontario Association of Architects has taken the following measures to comply with legislative requirements on eliminating Canadian experience requirements unless an exemption is granted or an alternative is identified that meets criteria prescribed in regulations (non-health regulators) or the exceptions in legislation are met (regulated health colleges):

The OAA worked with the Ministry of the Attorney General to propose amendments to the regulations under the *Architects Act* that provide an alternative to Canadian Experience. Namely - 31(6): If fewer than 940 of the total hours of experience required by the Internship in Architecture Program 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. This regulation amendment received Royal Assent early in 2024.

B. Language Proficiency Testing

Change Required: No Changes Required

The Ontario Association of Architects has taken the following measures to comply with recent legislative changes requiring that regulators accept language proficiency testing results derived from any of the tests accepted for immigration purposes to satisfy their language proficiency requirements:

The OAA does not require testing of language proficiency within the procedures it administers, but the CACB, which performs academic certifications for all Canadian architectural regulators, is currently working with IRCC to become a recognized Educational Credential Assessment (ECA) Agency for Express Entry exclusive for the profession of architecture. The CACB does require a demonstration of language proficiency within their academic certification process within which it accepts tests accepted by the IRCC. CACB-accepted tests are checked off in the question below for information-sharing purposes.

C. Emergency Registration

Change Required: No Changes Required.

D. Registration timelines (FARPACTA Regulators only)

Profession: Architect

i. Domestic Labour Mobility Applicants

9.1 (4) of FARPACTA prescribes that regulators must make a registration decision within 30 business days from the time that they receive a complete application “and everything required by the regulated profession in respect of the application.” The OAA requires the following documentation before beginning to count the 30-day registration period. This would be the starting point of the registration process for the purpose the data summarized below.

- Completed application form;
- Payment of fee;
- Proof of date of birth; and
- a confirmation of registration from their home jurisdiction

For domestic labour mobility applications received between January 1 and November 30, 2023, registration timelines and outcomes are summarized below:

Registration decisions	30 days or fewer	More than 30 days
Full registration granted	49	0
Alternative registration granted	0	0
No registration granted	0	0

i. Internationally Trained Individuals

Sections 5 and 6 of Ontario Regulation 261/22 made under FARPACTA establish two-time standards for ITIs:

- A six-month time limit for a regulator to make a registration decision following receipt of everything that it requires in respect of an application for registration. (This time limit must be met in 90% of all cases.)
- A 12-month standard for the regulator to report on its ability to register ITIs, who are eligible for registration without condition, from the earlier of the date that:
 - a) the regulated profession receives everything it requires in respect of the individual's application for registration, or
 - b) any third-party that assesses the individual's qualification on behalf of the regulated profession receives everything it requires for this purpose.

Section 6 of the regulation further stipulates that the regulator's annual Fair Registration Practices Report shall include data on a regulator's compliance with the six-month standard, and its ability to meet the 12-month standard and, where the regulator has been unable to meet this one-year standard, the steps that the regulator is taking to meet this target.

The Ontario Association of Architects requires the following documentation before beginning to count the six-month registration time-period for internationally educated individuals.

- Completed application form;
- Payment of fee; and
- Details and confirmation of the requirements for the applicants relative to the chosen path to licensure.

Measures undertaken to date to comply with new registration time limits for internationally trained individuals are as follows:

Applications to the OAA:

1. Application and instructions can be seen on the OAA Website (<https://oaa.on.ca/registration-licensing/architect>).
2. Providing written acknowledgement of receipt of an application for licence within prescribed timeframe.
3. Responding to an applicant's inquiry in respect of their application within prescribed timeframe.
4. Internal assessment of application and any outstanding submissions within prescribed timeframe.
5. Making a registration decision after receiving a complete application (i.e. all required documentation) within prescribed timeframe (average time: two to four weeks).
6. Communicating a registration decision within prescribed timeframe.

BEFA program candidates making application for licence with the OAA:

1. Once all documents are received from candidate, BEFA sets assessment interview date.
2. Interview and assessment decision average time: 80 to 90 days.
3. Certification decision to candidate within #2 above.
4. Once BEFA certified, candidate can immediately make application for licence with the OAA.
5. OAA licence steps same as above, application and instructions can be seen on the OAA Website.

For applicants making application to the OAA: After receiving everything the OAA requires in respect of the application for registration, there should be no issue meeting a one-year time frame.

For BEFA candidates: Once all steps requiring the candidate's input or submissions have been completed, and what remains is the CACB's internal administration related to review and certification, the one-year time frame should be achievable. This time frame would include post-candidate interview CACB assessment and certification, plus the OAA application process. The only caveat is if a BEFA candidate does not immediately apply for licence with the OAA. There could be instances where an individual achieves BEFA certification, but waits to apply for licence for personal reasons outside the OAA's purview.

Please note that new legal time limits came into effect as of July 1, 2023. Because of longer time periods for internationally educated applicants, regulators will only be required to report publicly on achieving these requirements in the 2024 Fair Registration Practices Report.



Glossary of Terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practise their profession/trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others, unless there is an exception due to public health, safety, and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education/training in the United States and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession/trade and has been granted the right to practise and/or the right to use a professional designation or title. Members may hold a full licence to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the [Ontario Anti-Racism Directorate Data](#).

Registration requirements: The entry-to-practice requirements an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfilment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.

