



OMFC REGISTRATION REVIEW

**Certified Technicians and Technologists
Association of Manitoba**

Final Report (2012)

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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Introduction

This report presents the results of the Office of the Manitoba Fairness Commissioner's (OMFC) registration review with the Certified Technicians and Technologists Association of Manitoba (Association or CTTAM) as of July 2012.

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act* (Act).

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations to improve compliance. Two senses of compliance are at work in the legislation. First and foremost, it refers to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. Secondly, it refers to the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that a registration review for any given regulator is to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

The OMFC's review process culminates in a Final Registration Review Report, complete with an Action Plan from the regulator. This report is a public document submitted to the Province's Minister of Immigration and Multiculturalism and posted on the OMFC's website.

Final Registration Review Reports are comprised of the OMFC's Findings Report for the regulator, which details the results of the registration review, the Action Plan submitted by the regulator to address any issues raised by the Fairness Commissioner's recommendations and a compliance statement from the Fairness Commissioner.

This report, then, presents the OMFC's May 2012 Findings Report for the Certified Technicians and Technologists Association of Manitoba together with the Association's June 2012 Action Plan.

The Association's Registration Review Process

In consultation with regulators, the OMFC introduced a registration review process, including documentation and compliance evaluation tools, in the fall of 2009. The multi-step, registration review process has several key phases: documenting and understanding, evaluating and hearing feedback, and developing and agreeing to an Action Plan to move things forward. The process is designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

The Association's registration review began in November 2010 with the steps, activities and dates outlined in the chart below. The extended timelines of the review are due to the novel, evolving review process being implemented by the OMFC and do not reflect any concerns with the Association in the conduct of this review.

CTTAM's Registration Review		
Step	Activity	Date
Process Documentation	<p>Research and review of CTTAM's registration materials by OMFC</p> <p>Meetings between OMFC and CTTAM to complete the documentation of the assessment and registration process</p> <p>Completed <i>Process Documentation Tool</i></p>	November 2010
Compliance Evaluation and Findings Report	<p>Analysis and compliance assessment by OMFC</p> <p>Completed <i>Compliance Evaluation Tool</i> and Findings Report submitted to CTTAM</p> <p>Formal request to CTTAM for an Action Plan</p>	<p>August 2011</p> <p>April 2012</p>
Action Plan	<p>CTTAM's Action Plan in response to the Fairness Commissioner's recommendations</p> <p>The Action Plan forms the basis of CTTAM's and OMFC's relationship moving forward</p>	June 2012
Final Report	<p>Final Registration Review Report presented to CTTAM</p> <p>Registration Review Process Completed</p>	July 2012

CTTAM's Assessment and Registration Process

Brief Overview

The Certified Technicians and Technologists Association of Manitoba certifies and regulates engineering technicians and technologists in Manitoba. The Association operates under the authority of the Certified Applied Science Technologists Act (C.C.S.M. c. C45.1), regulating for right to title for several designations: Engineering/Applied Science Technician (C. Tech.); Engineering/Applied Science Technologist (C.E.T. & A.Sc.T.); Associate Member; and Student Member. The engineering and applied science technician and technologist titles are recognized nationally in that all provinces and territories (with the exception of Quebec) regulate for these designations based on the same set of academic standards and qualification requirements. Technicians and technologists can work in Manitoba without being registered, but require certification to represent themselves as designated technicians and technologists.

Applied science technicians and technologists specialize and work in a broad range of disciplines and occupations. This profession is closely related to professional engineering and many internationally educated engineers certify with the Association.

Qualification and Assessment

To be eligible for certification as a C. Tech., C.E.T. or A.Sc.T., an applicant must possess:

- Appropriate academic training as defined by National Technology Benchmarks of the Canadian Council of Technicians and Technologists (National Body)
- Two years of relevant work experience – one year of which must be Canadian
- Evidence of good character and professionalism, verified by three employer references
- For the technologist designations, an acceptable technology report
- A passing grade on the Association's Professional Practice Exam

The assessment process is initiated by the applicant providing a completed application form with supporting documentation and a \$140.00 application fee. Applications are first reviewed by the Association's Panel of Examiners who assesses academic credentials and then the Association's Certification Board who assesses work experience and combined with the academic assessment determine the membership classification of the applicant.

Applicants who have been recommended for certification must complete the Professional Practice Exam and are allowed up to 12 months to do so. The Professional Practice Exam is an open book, multiple format, 3-hour exam on professional ethics and the Association's Act, By-Laws and Code of Ethics.

Applicants who mostly meet, but not fully, the substantive certification requirements – sufficient academic training or professional work experience – may be eligible for Associate Membership and will be advised of the steps required and timeframe allowed to become fully certified. Associate Membership confers recognition that the individual possesses significant qualifications and is working toward full recognition with the Association.

Appeal

Applicants have a statutory right of appeal from assessment and registration decisions of the Association's Certification Board. Appeals are heard by the Association's Board of Directors.

Time and Cost

Depending on the circumstances of the applicant, the range of time and cost to be registered with the Association will vary: 2 to 5 months upon completed application and \$140.00 plus a pro-rated registration fee (\$110.00 to \$155.00 per year). The \$140.00 application fee includes the applicant's assessment, the Professional Practice Exam and the Professional Practice Exam Study Guide. There will be fees and time involved in supplying the required documentation.

For those who do not fully qualify for certification, additional time and costs may be incurred to go back to school or produce a technical writing report. Delays incurred securing syllabus and professional references are also not uncommon. Internationally educated applicants need to acquire at least a year of Canadian work experience before they qualify for certification.

Summary of Findings

The OMFC reviews regulatory practice systematically, following the Province's Qualifications Recognition Process Model. The assessment and registration process is analyzed from the perspective of the applicant, as a set of key steps on the journey from pre-migration through to labour market entry as a recognized professional.

The Association's compliance evaluation draws a picture of a progressive regulator committed to the fair assessment and registration of internationally educated technicians and technologists (IETT). The Association and the National Body are commended for several best practice models; most notable is the support and accommodation of IETTs throughout the registration process, from the provision of dedicated information and self-assessment tools, as well as helpful orientation, exam preparation, and employment information, to flexible assessment and exam grading practices. The Association has a history of working with stakeholders in the province to support better recognition for IETTs. The result is a timely, affordable registration process that offers an extensive array of supports for IETTs.

A chief recommendation that emerges from this report involves the need to provide an updated and more complete information package.

Below is a bulleted list of the OMFC's review findings for the Association's assessment and certification practice. These findings form the basis of the Fairness Commissioner's recommendations that follow.

- The Association's website information is for the most part complete, with extensive information for IETTs, but needs to be updated. A dedicated landing page explains the assessment and certification process in detail, step-by-step, including many useful features for IETTs. However, there is no direct link to the recently introduced Canadian Immigration Technology Network and no information is provided about alternative documentation or access to records.
- The National Body's Canadian Technology Immigration Network provides pre-arrival assistance as a first-stop, one-stop resource for professional orientation, employment, self-assessment, and certification information. Concrete, step-by-step instructions support pre-arrival preparation for IETTs. The Association's registration process can be initiated abroad.
- The assessment process is transparent in that the qualification standards and criteria are clear, as are the steps and process through which applicants are assessed.
- International academic credentials are assessed and recognized. The National Body provides a well-defined academic standard, the National Technology Benchmarks, and has done extensive work accrediting Canadian programs and assessing programs internationally. Since 2005, the Engineering Technologist Mobility Forum recognizes accredited technology programs from six countries as equivalent to the Canadian standard. The International Qualifications Database, recognized and used by provincial regulators, contains equivalency assessment for

thousands of international programs and supports an on-line, no-fee, self-assessment tool for IETTs.

- International work experience is assessed and recognized. Flexible assessment policies are in place with respect to professional references and to ensure applicants provide adequate job descriptions. One year of Canadian work experience is mandatory. Associate membership is available for IETTs that meet most of the required qualifications for full certification;
- Timelines for the assessment of applications are reasonable. Typically, upon completed application, applicants will be informed of their results in writing within two months. Summer applications will take longer, as much as a five-month delay is possible. Detailed, written reasons accompany assessment results.
- Preparation materials are provided for the Association's Professional Practice Exam. The Association recently introduced a preparation seminar for the exam that has proven very helpful. Partial credit is possible for the exam: applicants are only required to repeat sections of the exam where they were not successful.
- After several years directly delivering the Technical Report Writing Course, the Association has now partnered with Red River College to offer the program. The course provides IETTs the opportunity to produce a technical report that is a substantive certification requirement and a stumbling block for many IETTs whose academic programs lacked a report requirement.
- The registrar and Association staff provide one-on-one assistance, information and application support to IETTs. The Association's communication with applicants throughout the registration process is timely and systematic. Applicants whose qualifications are clearly insufficient for certification are informed and given the opportunity for a refunded application fee.
- A formal appeal process is available and well as a mechanism for informal reviews. However, no information is provided in the registration information about the possibility of a review or appeal.
- The Association is not for profit. Registration and assessment fees are based on cost-recovery and are quite reasonable: \$140.00 for assessment, exam prep guide, and Professional Practice Exam and a \$110.00 - \$155.00 registration fee.
- A variety of resources and supports are in place for new registrants to integrate into the labour market. The Association has established relationships with prominent employers in the province and provides information about employment opportunities. In collaboration with the OMFC and the Association of Professional Engineers and Geoscientists of Manitoba, the Association is participating in the development of a Professional Practice Seminar for Engineering and Engineering Related Professions; these seminars will provide IETTs professional orientation.

The National Body's Canadian Technology Immigration Network also provides labour market and employer contact information.

Fairness Commissioner's Recommendations

As a result of the OMFC's registration review of the Certified Technicians and Technologists Association of Manitoba and to improve compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends:

1. *That* with regard the Association's information package under development,
 - The new information package include a more prominently presented landing page for IETTs;
 - Make clear the role and resources afforded by the National website and the Canadian Technology Immigrant Network;
 - A complete, dedicated English and French language proficiency section be provided in the registration material that addresses language proficiency requirements, the communication demands of the profession, language upgrading opportunities and the employability issues that surround English and French language proficiency;
 - Make clear the possibility and details of alternative documentation and an applicant's access to records;
 - Provide clear and complete information about the appeal process and policies, including the pre-appeal process and practice. This information needs to be present both in the registration material and accompany any registration decision that denies registration or subjects it to conditions;
 - Make clear the possibility of partial credit for the Professional Practice Exam;
 - Include the addition of the French version of the Occupational Fact Sheet.
2. *That* the Association implement a strategy to more fully recognize international work experience.
3. *That* the Association allow IETTs the opportunity to demonstrate academic qualification through work experience.
4. *That* the Association shorten the 5-month summer delay for applicants to receive their assessment results.

Association's Action Plan

Below is CTTAM's response to the Fairness Commissioner's Recommendations:

Item 1: The Association's Information Package

CTTAM is currently in the process of updating its website and should be fully launched in the near future.

- It will have a prominent landing page for IETTs titled *New Canadians*.
- There will be a link to our National body, The Canadian Council of Technicians and Technologists along with an explanation as to its role.
- In addition, the website will have links directly aimed at the IETTs including:
 - The Immigrant Toolbox
 - The Resource Guide for Internationally Educated Engineers
 - CTIN (Canadian Technology Information Network)
 - TRC (Technology Registrations Canada)
- Language Proficiency: As a rule CTTAM does not require language proficiency as a requirement for application or certification. The only language proficiency requirement is for the Technical Report Program which is offered in co-operation with the Fairness Commissioner's office as participants with low language proficiency typically do not do well. The level of language either English or French is something that is between the Employer and Employee and varies greatly from workplace to workplace in the technology field.
- Alternative Documentation. This information is currently provided during a face to face information meeting with the applicant. Information will also be placed on the website. Access by members to their files will also be placed on the website.
- The Appeal Process for all CTTAM members is clearly defined in the CTTAM By-law and reference will be made on our website. All applicants receive a Professional Practice Manual at the time of application. The manual includes our Code of Ethics, By-law and the Certified Applied Science Technologists Act. As well, reference will be made to the Appeal Process when corresponding registration decisions.
- Partial Credits for Professional Practice Exam: This is currently done by CTTAM as a courtesy, and only for the written section of the exam dealing directly with Ethics. If the applicant has this section correct, it shows they have knowledge of the requirements for Canadian Ethical Standards. If an applicant fails the exam twice, the Registrar reviews the exam and the areas of concern with the applicant.
- The French version of the Occupational Fact Sheet will be available as a link.

Item 2: The Association implement a strategy to more fully recognize international work experience.

- CTTAM currently recognizes all of the work experience of our International Applicants. The requirement for Canadian references, however, is a national requirement. The Standard states that the applicant should have worked with the professional reference for one year. In Manitoba, we have the requirement for three professional references; as compared to some sister associations which have the requirement for four.

Item 3: The Association allow IETTs the opportunity to demonstrate academic qualification through work experience.

- CTTAM already provides for this through the National Technology Benchmarks (NTB). Applicants may do a self-assessment using all PLA (Prior Learning Assessment) tools. Included is: Education, Training Courses, Work Examples, Interviews and Letters of Testimony from known professionals.

Item 4: The Association shorten the five-month summer delay for applicants to receive their assessment results.

- There are three CTTAM Boards that do all of the parts required for the assessment and consist of volunteers, based on the number of applicants during this period a summer session is not required.

However, to address a situation where there is a need to have early information when applying for employment, all applicants are informed that if they need to have information for an employer, they can have the employer call the Registrar for a preliminary estimate as to level of certification and timeframe for the process to happen.

Fairness Commissioner's Statement of Compliance

The Association's Action Plan is for the most part a progressive response to the recommendations resulting from the registration review. These actions will support the fairer assessment and recognition of internationally educated technicians and technologists and are fully consistent with *The Fair Registration Practices in Regulated Professions Act*.

The Association's commitment to the effective and fair assessment and registration of Internationally Educated Technicians and Technologists (IETT) is clear. The work the Association has done implementing a Technical Report Writing program and the more recent evolution of the program to Red River College provides Manitoba's internationally educated technologists an effective path to full recognition. The Canadian Council of Technicians and Technologists' (National Body) new national web portal is a showcase of dedicated information and resources for Canada's IETTs. Most impressive is the Association's remarkable staff; throughout the registration process, applicants find support, useful advice and reasonable accommodation.

One of the issues flagged in this review concerns the Association's lack of transparency surrounding many of its positive practices accommodating IETTs. To cite one example, although the Association has been adapting the National Body's new academic self-assessment tool to support a prior learning assessment of the applicant's work history, no information is provided about this possibility in their registration information. This practice is commendable, but it needs to become a matter of policy and made clear on the Association's website. Policy and transparency are needed both to ensure consistent practice and because applicants have a right to know how they may be assessed.

We truly appreciate the Association's co-operation and openness during the conduct of the registration review and thank the Association's staff and management for their participation.



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