

2017 Registration Review Report

Manitoba Association of Architects



OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

Table of Contents

Executive Summary	1
Introduction.....	2
Context of the Profession in Manitoba	3
Overview of Assessment and Registration Process.....	4
State of Progress.....	9
Fair Practice Analysis	12
Progress Opportunities.....	17
Fairness Commissioner’s Recommendation.....	17
Manitoba Association of Architects – Action Plan	18
Statement of Compliance	20
Appendix I: 2011-2015 Registration Data.....	21
Appendix II: 2017 Registration Review Process	23

Executive Summary

The 2017 Registration Review Report for the Manitoba Association of Architects (MAA) examines their state of progress with regard to the fair consideration of individuals educated outside of Canada. The Fairness Commissioner identifies progress opportunities and MAA responds with an action plan.

MAA's licensure practice for internationally educated architects (IEAs) has many progressive features. Although full licensure may take several years to complete, entry into practice under conditional registration as an intern is possible for many IEAs in a timely way. A variety of supports are in place, including reciprocity agreements with numerous international jurisdictions, a national Syllabus Program that allows IEAs to address gaps in academic qualification, the ability to recognize professional experience to waive elements of the Internship Program and the provision of strong personal support and assistance from MAA. For well qualified, mid-career IEAs, the Broadly Experienced Foreign Architect Program (BEFA) offers an alternative licensure assessment focused on the applicant's professional work history. Through BEFA, IEAs have a much timelier route to full licensure avoiding many of the academic, exam and internship requirements of the conventional assessment process.

Progress in this profession since the 2012 registration review includes:

- The 2012 introduction of the alternative BEFA program
- In 2012 the national Internship Program was revised and streamlined
- Since 2014, a pair of tri-national reciprocity agreements allows fast track licensure for IEAs from the United States, Mexico, Australia and New Zealand
- MAA improved its website registration material for IEAs

The Fairness Commissioner sees two progress opportunities: working with the Canadian Architectural Certification Board (CACB) to improve IEA registration data collection and implementing an appeals process for MAA's assessment and registration decisions.

In response to the progress opportunities identified by the Fairness Commissioner, MAA commits to:

- Continue to share CACB data
- Work to implement an appeals process consistent with MAA legislation

The Fairness Commissioner sees MAA's Action Plan as a positive response to the progress opportunities.

Introduction

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 for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are 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 2017 Registration Review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

In this report, the Manitoba Association of Architects' (MAA) assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of MAA's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

This report is a public document and will be posted on the OMFC's website and submitted to the Minister of Education and Training.

Context of the Profession in Manitoba

Architects offer professional services related to the design and construction of buildings.

In Canada, the profession of architecture is distinguished by the broad knowledge and skills practitioners must master, compared to the more specific and restricted technical skill sets of other professions. Architects are licensed as generalists where practitioners must show competence in the field in the full breadth of professional activities involved in design and building construction.

The profession is international in character in that practice across national boundaries is commonplace.

With funding support from the federal government, the Broadly Experienced Foreign Architects Program (BEFA) was developed and formally launched in September 2012 (following a pilot phase). BEFA provides well-experienced, internationally educated architects (IEAs) a timely, cost-effective path to licensure.

Shortages of licensed practitioners in Canada led to the identification of architecture as a priority occupation in 2010 under the Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications.

According to Manitoba's labour market forecast, approximately 200 job openings are expected for architects in the province between 2016 and 2022. According to the Canada Job Bank, a balance between labour supply – Canadian Graduates, immigration and mobility – and labour demand for architects is projected in Canada over this same period.

Overview of Assessment and Registration Process

The Manitoba Association of Architects (MAA) currently operates under the authority of *The Architects Act* (C.C.S.M. c. A130). All persons practicing architecture and using the Architect designation in Manitoba must be registered with MAA.

Architectural work can be undertaken without registration with MAA if this work occurs as an employee of a firm that is authorized to practice, under the supervision of a registered architect within the firm, which will be professionally and legally responsible for this work.

Qualifications

There are two principal qualifications needed for registration as an architect: a professional degree in architecture from a Canadian Architectural Certification Board (CACB) accredited program or its equivalent and extensive professional work experience in a variety of practice areas under the supervision of a registered architect.

Assessment and Registration Process

MAA and other provincial regulators employ a triple 'E' assessment process: **E**ducation, **E**xperience and **E**xamination. A new, fourth 'E' of **E**quivalency, the Broadly Experienced Foreign Architects program (BEFA) allows qualified internationally educated architects (IEAs), who have a significant level of practice following registration/licensing in a foreign jurisdiction, a second, alternative route to licensure.

In accordance with the Canadian Reciprocity Agreement and the Agreement on Internal Trade, MAA recognizes as qualified applicants registered by other Canadian provincial regulators. Experienced applicants trained in the United States and certified by the National Council of Architectural Registration Boards (NCARB) may be recognized. Experienced architects from the United States, Mexico, Australia and New Zealand may also be eligible for licensing under one of two Tri-National Agreements.

The Triple E Assessment Process

1. Education

Internationally educated architects (IEAs) first step is to submit their academic qualifications to the Canadian Architectural Certification Board (CACB) to be assessed against the Canadian Education Standard.

IEAs with gaps in academic qualification can complete coursework online through the Royal Architectural Institute of Canada's (RAIC) Syllabus Program or at accredited universities.

IEAs with professional degrees, but who are identified as having gaps in certain areas relative to the Canadian standard, may be granted provisional certification; and would be allowed to proceed with the internship process so long as they commit to completing, within a prescribe period, approved remedial coursework.

Documentation requirements for CACB's academic assessment include:

- a completed application
- an official Transcript of Record, or notarized copy, of all studies relevant to the architecture degree
- notarized copies of degrees or diplomas in the original language
- if necessary, course descriptions of the program in architecture
- if available, an academic portfolio of studio work
- an application fee of \$1,815.34 for non-American, international academic credentials

All documents must be in English or French and if necessary, certified translations will be required.

Upon completed application, applicants are informed within three months, and in writing, of CACB's assessment results of their academic credentials.

2. Experience

Upon CACB certification or provisional certification, the next step is for the applicant to make application to MAA for enrolment in the Internship in Architecture Program (Internship Program). The applicant must find a registered MAA Architect to be a mentor and an employer where architectural experience can be acquired. Application involves:

- completed application form
- a photocopy of the degree(s) in architecture (or equivalent)
- evidence of certification or provisional certification of academic qualifications by CACB
- a completed Mentor Confirmation Form
- a completed Employer Confirmation Form

There is an annual Intern Membership fee of \$150 + GST (pro-rated quarterly, based on the calendar year).

Interns must complete a minimum of 3,720 hours in various mandatory areas of professional experience. IEAs may be credited with experience gained outside Canada if their work was supervised by an architect authorized to practice in the jurisdiction, is relevant to practice in Canada and can be appropriately documented. Significant Canadian or Canadian-like experience will be required to complete the Internship Program.

Experience forms must be signed by the employer and mentor, and are reviewed by MAA.

3. Examination

Upon CACB certification of academic qualification and upon review and approval of at least 2,800 hours of experience, MAA grants the applicant eligibility to write the Examination for Architects in Canada (ExAC). Successful completion of all four components of the exam satisfies MAA's examination requirement.

The ExAC exam is a dedicated Canadian national architecture exam. It was first offered in the fall of 2008 and all provincial/territorial associations in Canada have adopted the examination.

The ExAC is administered once a year each fall, in a paper and pencil format. The ExAC is comprised of four sections and is sat over a period of two consecutive days. The cost to take all four components of the ExAC was \$920 (+GST) in 2016. Study materials for the ExAC are available on the ExAC website and from the MAA office.

Partial credit is possible for the ExAC. Applicants only re-write in those sections where they fail to meet standard.

The Broadly Experienced Foreign Architects Program (BEFA)

The BEFA program provides a second, alternative route to licensure for experienced IEAs that can demonstrate at least seven years of post-registration architectural work experience (current in the last 10 years). There are three assessment steps: eligibility, self-assessment, and a formal interview. The majority of the application process through the first two stages is conducted online and the application fees are required at the beginning of each stage.

1. **Eligibility Assessment** – This involves the applicant providing evidence of a professional degree in architecture, evidence of licensure/registration in a jurisdiction outside Canada and a chronological resume that demonstrates at least seven years of post-registration/licensure experience in architecture within the last 10 years. BEFA staff review the applicant's initial eligibility submission to determine if they can proceed to the next step.
2. **Self-Assessment** – This step requires an applicant to complete a Project Resume using twelve Competency Templates along with supporting material in a self-assessment guide. The applicant's work experience must be documented in a way that demonstrates evidence of experience equivalent to Canadian standards and required competencies.

Applicants have access to support from BEFA staff in completing their application as well as an initial review to ensure the Project Resume is sufficiently complete for an assessment.

A three member Assessment Panel independently reviews the applicant's file.

Successful applicants are eligible to proceed to the interview. At this point in the process, applicants must complete a minimum of six months of experience in the provincial/territorial jurisdiction of application in advance of the interview.

Applicants with gaps identified in their applications may be asked to supply more information or be required to acquire additional work experience or academic upgrading before proceeding.

3. **Interview** – The applicant must successfully complete an interview with a three member BEFA panel. The purpose of the interview is to confirm the knowledge and experience found in the applicant’s self-assessment application and address any areas of concern for the panel.

Successful applicants are awarded certification from the BEFA program and proceed to apply to MAA. Certification by the BEFA program is recognized by all of Canada’s architectural licensing authorities.

If gaps are identified, the applicant may be required to complete further academic training, professional development or work experience; a second interview may also be needed.

Final Application

Upon completion of the Triple E assessment process or the BEFA program, the final step to registration involves application to the MAA’s Registration Board, who makes recommendation to Council for license to practice architecture in Manitoba. Application involves providing:

- proof of completion of the Triple E, Education, Experience and Examination requirements *or* proof of BEFA certification
- a legal declaration of having knowledge of documents governing the practice of architecture in Manitoba
- evidence of good character in the form of three reference letters
- application fee of \$250 (+GST)

Following approval of registered membership, annual dues (pro-rated quarterly on the basis of the calendar year) for that membership category will be invoiced; and, if applicable, a pro-rated credit for intern dues paid will be provided. Registered membership dues for 2017 remain at \$900 + GST for the full year.

Appeal Process

The Architects Act gives the right to an applicant to appeal to court, when the application for registration is not approved or is granted subject to conditions by the Council. MAA has no appeal process of its own.

CACB provides pre-appeal and formal appeal opportunities for its assessment of academic qualifications, and the BEFA program.

The Committee for the Examination for Architects in Canada (CExAC), which oversees and is responsible for the national professional exam on behalf of the regulatory bodies in Canada, provides for a formal review concerning any of the four components in which a candidate was unsuccessful.

Time and Cost

The time and cost to register with MAA will vary depending on the circumstance of the applicant.

For well-organized and highly qualified IEAs, the BEFA program could be completed in less than a year; though many candidates may take more than a year to complete the self-assessment application, given the volume of documentation required.

The Triple E assessment process is more involved – meeting the academic standard, passing the examination and completing the internship program – and so consequently will usually be a longer process. In general, for both Canadian and internationally educated applicants alike, meeting the broad and extensive work experience standards for licensure is the principal hurdle to timely registration. Seven years or more as an intern in the field is not uncommon.

Currently, 2017, the direct cost of the application, assessment and registration through Triple E assessment process is approximately \$5,200. There may be a variety of associated costs, e.g., translation and notarization of documents, academic coursework, exam re-writes, etc.. The BEFA program fee is \$5,367.50 and with the MAA's application and registration fee, the direct cost for licensure will be just under \$6,500. Associated costs with the BEFA path to registration are fewer but may also involve the costs of academic upgrading.

State of Progress

The Manitoba Association of Architects (MAA) continues to demonstrate a commitment to the fair assessment and recognition of internationally educated architects (IEAs).

In the profession of architecture, there are two principal licensure pathways for IEAs as well as reciprocity agreements and accords in place that support fast tracking some or all elements of the process. Both licensure pathways are administered by the Canadian Architectural Certification Board (CACB) together with provincial regulators across the country.

The Triple E licensure pathway has many progressive features, including provisional academic certification, a Syllabus Program that provides IEAs access to online academic courses and the ability to recognize professional experience to waive elements of the Internship Program. The Triple E process can take several years to complete.

The Broadly Experienced Foreign Architect Program (BEFA) pathway provides IEAs with extensive professional experience a much timelier, one to two year, licensure opportunity.

Recent Progress

MAA and the profession nationally have made significant progress with the assessment processes for IEAs over the last several years.

Most notably, the introduction of the BEFA program in 2012 marks a progressive assessment milestone in this profession. Focused on qualifications found in professional experience, BEFA allows a timelier, more relevant assessment of qualification for mid-career IEAs. Qualified BEFA candidates are not required to write the national Examination for Architects in Canada (ExAC) exam. This means much less time is spent with remedial study and in internship before full registration.

There have also been improvements to the Triple E licensure pathway. The Internship Architect Program was revised in 2012. Measures were adopted in an effort to streamline and make the program more effective. Required hours in mandatory practice areas were reduced from 5,600 to 3,720 hours and financial hardship and leave policies were introduced. In 2008, the ExAC, a new Canadian national exam, was introduced. The exam has been subject to extensive psychometric scrutiny in its development. It is half the length and provides a more relevant evaluation of Canadian professional practice than the North American, Architects Registration Exam (ARE) it replaced. Partial credit allows individuals to repeat only sections of the exam where they failed to meet standard.

Since 2014, two tri-national reciprocity agreements recognize IEAs with extensive professional experience between jurisdictions, providing fast-track licensure opportunities for qualified architects from the United States, Mexico, Australia and New Zealand. Since 2008, the Canberra Accord recognizes the equivalency of academic qualification in 37 countries.

Subsequent to its 2012 registration review, MAA significantly improved its registration material for IEAs. A more complete information package is now provided; the process is presented by step and includes third party links and financial support information.

Substantive Progress Opportunity

Timely licensure in the profession of architecture is possible for IEAs that qualify under reciprocity agreements and for those with extensive professional experience who qualify for the Broadly Experienced Foreign Architect Program (BEFA).

For IEAs who do not qualify for these licensure pathways, those from international jurisdictions that fall outside of the various reciprocity agreements in place and those without the broad range and extent of experience needed for the BEFA option, the Triple E licensure pathway can take many years to complete. However, entry into practice as an intern or in some capacity under direct supervision of a registered architect is possible early into the Triple E licensure process.

Two key factors account for the extended licensure timeline of the Triple E process. First, qualification standards and competencies in Canadian architecture are broad relative to practice in many international jurisdictions. The result is that many applicants have gaps in academics and experience that will mean a return to study and internship. Second, interns often struggle to secure employment that will support the full range of professional activity needed to complete internship requirements. The result is that even after CACB academic certification is achieved, many interns still face several years and require multiple employers to complete the program. Similar obstacles completing internships also confront domestically educated architects.

The challenge of internship in the architect profession is a natural reflection of the breadth of the generalist practitioner model that may not always be well aligned with the reality of intern practice and opportunities in the field. In this context, the extended licensure timeline for the Triple E process is not unexpected or unfair.

Substantive progress in the licensure of IEAs in Manitoba's architect profession is a matter of fine-tuning and continuous improvement of the MAA/CACB administered licensure pathways.

With respect to the Triple E assessment, timely entry into internship for IEAs is a critical fairness metric. This is because as an intern, people can be gainfully employed, maintain and improve their skills in practice and continue to have a licensure pathway forward.

Data collection for Manitoba IEAs in the Triple E process is needed to give us a good picture of timelines and outcomes. This data could be helpful to support any future considerations to improve the process.

Fair Practice Analysis

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired through professional work experience and the need for supervised practice opportunities as key substantive issues critical to realize progress among Manitoba regulators.

Following the Manitoba Fairness Standard, the Fairness Commissioner has the following commendations, comments and concerns about MAA's state of progress concerning these key fairness issues:

Timely Registration

The assessment and registration process is structured efficiently (Manitoba Fairness Standard, 7.1).

MAA's various licensure pathways for IEAs, the Triple E assessment, the BEFA program and international reciprocity agreements are structured efficiently.

The Triple E Assessment has several key efficiency features:

- CACB'S Canadian Academic Standard is defined in a manner that supports equivalence assessments as opposed to less relevant identity assessments.
- Applicants with gaps in academic qualification have the ability to take a broad range of remedial coursework online through the Royal Architectural Institute of Canada's Syllabus Program or at accredited academic programs.
- Internship registration is possible with CACB provisional certification so that people can gain experience while they complete academic coursework.
- Both the Canadian ExAC and North American ARE exams are recognized (the ARE, however, will soon be phased out). Applicants are eligible to write either exam midway through their internship and upon CACB academic certification, removing a potential delay to move to full licensure at the end of internship. This is an important policy for the ExAC exam that is offered only once a year.

The BEFA program includes:

- Applicant-friendly policies and supports are in place to promote engagement and successful documentation of professional work experience.
- Applicants recognized as qualified by virtue of their professional experience may not have to undergo remedial academic coursework, can have elements of internship program waived in whole or in part and are not required to complete the national ExAC exam.

Several reciprocity and accords are in place:

- NCARB certified, U.S. trained architects with professional experience are recognized.
- Since 2014, two tri-national reciprocity agreements recognize IEAs with extensive professional experience between jurisdictions, providing fast-track licensure opportunities for qualified architects from the United States, Mexico, Australia and New Zealand.
- Since 2008, CACB has been party to the Canberra Accord, where accredited academic programs from several international jurisdictions are recognized. This includes Australia, China, South Korea, Mexico and the programs accredited by the Commonwealth Association of Architects (33 countries).

The assessment and registration process is periodically reviewed to ensure timeliness for internationally educated applicants (Manitoba Fairness Standard, 7.2).

The assessments used by MAA are nationally developed and partially administered by CACB. MAA was an active participant in the development of the BEFA program and is responsible for conducting assessments of professional work experience and internship assessments.

CACB assessments – BEFA Program and academic certification, as well as the ExAC exam have all undergone extensive review.

Recent examples include the 2008 introduction of the ExAC exam. The new Canadian national exam is subject to extensive psychometric scrutiny, is a more relevant evaluation of Canadian professional practice than the North American ARE exam it replaced and partial credit allows individuals to only repeat sections of the exam where they failed to meet standard.

In 2012, the CACB education standard was review and revised.

Officially established in 2012, the BEFA program was built from the ground up, including the development of a Competency Matrix that lays the foundation for the identification of qualification evident in professional experience.

Communication with applicants is timely and systematic (Manitoba Fairness Standard, 7.3).

MAA's Executive Director meets with applicants, providing advice and assistance with the assessment process and the internship program and internship opportunities. Dedicated orientation sessions are held periodically.

As part of MAA's Internship Program, interns require mentors – an architect other than and external to the employer to provide independent advice on their internship. This is an innovative, helpful support.

MAA's practice in this area is highly commendable.

The registration process is such that qualified internationally educated applicants have an opportunity to practice in some capacity within a year of application (Manitoba Fairness Standard, 7.4).

MAA's assessment and registration process meets this standard.

In this profession, all IEAs have the opportunity to practice in the capacity of an employee of an authorized firm under the supervision of a registered architect. This work can occur prior to the individual's application for registration with MAA.

For those applying for registration under the Triple E licensure pathway, applicants deemed academically qualified or with gaps that can be addressed under the Syllabus Program may have a conditional, intern registration opportunity within six months.

The BEFA program may take longer than a year to fully complete, but this is a pathway to full registration.

Various reciprocity agreements and accords also support fast track academic recognition and in some cases fast track full licensure.

Applicants in MAA's Triple E licensure pathway can take several years to complete the internship process to full licensure. Employment opportunities for IEAs to complete the type and extant internship requirements are a key factor.

Recognition of Professional Work Experience

Professional work experience is considered to determine qualification (Manitoba Fairness Standard, 5.10).

MAA considers professional work experience to determine qualification.

In the Triple E assessment process, depending on the applicant's professional experience, additional experience may not be required. Full recognition is possible for those with extensive professional experience, including sufficient experience in a Canadian-like environment. This is progressive practice.

In the BEFA program, professional experience is considered for the assessment of all of MAA's substantive qualification requirements – academic qualification, internship experience and the exam requirement. This innovative approach shows what is possible when qualifications evident in professional experience are the key focus of assessment.

Regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience (Manitoba Fairness Standard, 5.11).

MAA has well developed standards and criteria to assess work experience both for its intern programs as well as for the assessment of international professional experience. MAA provides an "Internship in Architecture Program" manual that outlines and explains the internship process, and a "Guidelines for Mentors and Employers" document defines the roles and responsibilities of employers and

mentors. An “Experience Area Description” document is used to define required practice activities with specific assessment criteria.

Well defined standards and criteria are also in place for the BEFA program. Outcome based competency standards were developed for the program in the form of a “Competency Matrix”.

If Canadian work experience is a mandatory requirement, it is clearly justified (Manitoba Fairness Standard, 5.12).

Strictly speaking, there is no mandatory Canadian work experience through the Triple E assessment process or with some of the reciprocity agreements in place. Depending on the professional experience of the applicant, it is possible under these licensure pathways to be fully recognized without needing to complete any period of internship or supervision in Canada.

For the BEFA program, a minimum of six months of experience in Manitoba (or the participating provincial jurisdiction) is required.

In the profession of architecture, requirements for provincial, Canadian or Canadian-like professional experience are based on a well articulated sense of the knowledge and skills this experience provides. Consequently, when IEAs are required to acquire it, it is not required blindly, but justified on the grounds of an assessment of the individual’s qualifications.

Supervised Practice Opportunities

Supervised practice opportunities are available for the purpose of assessment and gap training (Manitoba Fairness Standard, 5.13).

MAA’s intern registration allows applicants an opportunity for timely entry into practice and a path to full designation upon meeting the requisite professional work experience with documentation, assessments and references from employers.

Practice is possible without registration with MAA if it occurs under the direction, control and responsibility of a registered member or firm.

Additional Fairness Concerns

Unfavourable assessment and registration decisions that deny or condition registration are subject to appeal (Manitoba Fairness Standard, 9.1).

MAA does not have an internal appeal process for contested registration decisions. *The Architects Act* stipulates applicants can appeal MAA council decisions that refuse registration or subject it to conditions to the Court of Queen’s Bench.

We note review mechanisms are in place for CACB’s academic qualification, BEFA assessments and the ExAC exam.

MAA needs to establish a fair internal appeal process for registration decisions that deny or condition registration. This includes assessment decisions in the process not covered by CACB and ExAC review opportunities – MAA’s unfavourable experience review, internship and good character decisions.

Many regulators provide a first-step, pre-appeal process before a formal review opportunity. A pre-appeal process allows an informal discussion of the contested decision, can support the timely resolution of issues, and helps dissuade specious appeals.

Lack of an appeal process was an issue identified in MAA’s 2012 registration review. In its 2015 Action Plan update MAA reported that an appeal process remains a work in progress.

Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding the Manitoba Association of Architects' assessment and registration practice:

1. Continuing discussions with CACB to obtain data could improve understanding of Manitoba IEAs experience in the Triple E process and the BEFA program.
2. Implementing a fair appeal process, including a pre-appeal process, to allow for review of MAA's unfavourable assessment and registration decisions would improve procedural and relational fairness.

Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the Manitoba Association of Architects take action regarding the above progress opportunities.

Manitoba Association of Architects – Action Plan

In response to the Fairness Commissioner’s recommendation, the Manitoba Association of Architects (MAA) proposed the following Action Plan as of May 17, 2017.

MAA’s Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2017 Registration Review to discuss implementation of activities and updates to the Action Plan. Action Plan updates will be posted on the OMFC’s website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Progress Opportunity	Action(s)	Completion Date
<p>1. Continuing discussions with CACB to obtain data could improve understanding of Manitoba IEAs experience in the Triple E process and the BEFA program.</p>	<p>The MAA will continue to share any annual or semi-annual reports that it receives from the CACB, outlining national statistics relative to the files that it addresses at all levels, with the Office of the Manitoba Fairness Commissioner (for general information purposes).</p>	<p>Ongoing</p>
<p>2. Implementing a fair appeal process, including a pre-appeal process, to allow for review of MAA’s unfavourable assessment and registration decisions would improve procedural and relational fairness.</p>	<p>It has been determined that further housekeeping amendments to The Architects Act, in the short term, would be highly uncertain. Accordingly, a potential approach towards an internal appeal process for unfavourable assessment and registration decisions, that would work around the restraints of the existing legislation and not compromise the appeal provisions afforded at that level, will be vetted with MAA’s legal counsel; and appropriate amendments to the MAA By-Laws will thereafter be drafted and presented to the MAA Council for approval and to the MAA membership for ratification.</p>	<p>June 2018</p>

Action Plan Comments

MAA Comments
<p>Presumably, Item #1 seeks to provide some level of information concerning a potential number of applicants that might arise within the various processes. While this would appear to go beyond issues of compliance under the provincial legislation, the MAA is certainly prepared to share documentation in this area with the Fairness Office, provided that it is considered within the appropriate context.</p>

Statement of Compliance

The Manitoba Association of Architects' (MAA) Action Plan is a positive response to the progress opportunities identified in this review.

These actions support fair practice and align with the intent of *The Fair Registration Practices in Regulated Professions Act* to improve licensure processes for internationally educated applicants in Manitoba.

Over the last several years we have seen impressive progress in licensure practice in this profession. Although much of this activity takes place with national bodies, MAA has been actively involved and a strong advocate for fair practice for internationally educated architects. Manitoba IEAs are fortunate to have access to the kind of the support and assistance provided by MAA.

I am confident MAA will successfully implement a fair appeal process and that working with MAA and their partners we can improve our registration data collection to better our understanding of the experience of Manitoba IEAs during the licensure process.

I look forward to our future work and engagement.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

The Manitoba Association of Architects (MAA) reports annually to OMFC on the registration of internationally educated architects in Manitoba.

MAA received 88 total applications from 2011-2015. Among these applications, 34% were internationally educated applicants (IEAs).

The top country of education was the United States representing 54% of IEAs. The OMFC understands that many U.S. trained architects obtain licensure in Manitoba for the purpose of completing a particular project and do not immigrate.

With regard to licensure outcomes, 73% of IEAs obtained full registration by the end of 2015. The remaining applicants were in process as interns or had withdrawn or been refused. MAA has two licensure pathways possibilities:

Education, Experience, and Examination Assessment (Triple E)



Broadly Experienced Foreign Architect Program (BEFA)



Data on complete licensure timelines is not available. However, the time from MAA file opened to full registration is expected to be short given that the assessment process is largely completed before application to MAA.

This analysis of 2011-2015 of MAA applicant registration data was provided by the Manitoba Bureau of Statistics.

For additional context, immigrant landings for architects to Manitoba for 2011-2015 indicate:

Year	Landings
2011	8
2012	10
2013	10
2014	16
2015	5
Totals	49

The NOC code associated with these landings is 2151 Architects.

Source: Immigration, Refugees and Citizenship Canada. Prepared by Manitoba Education and Training.

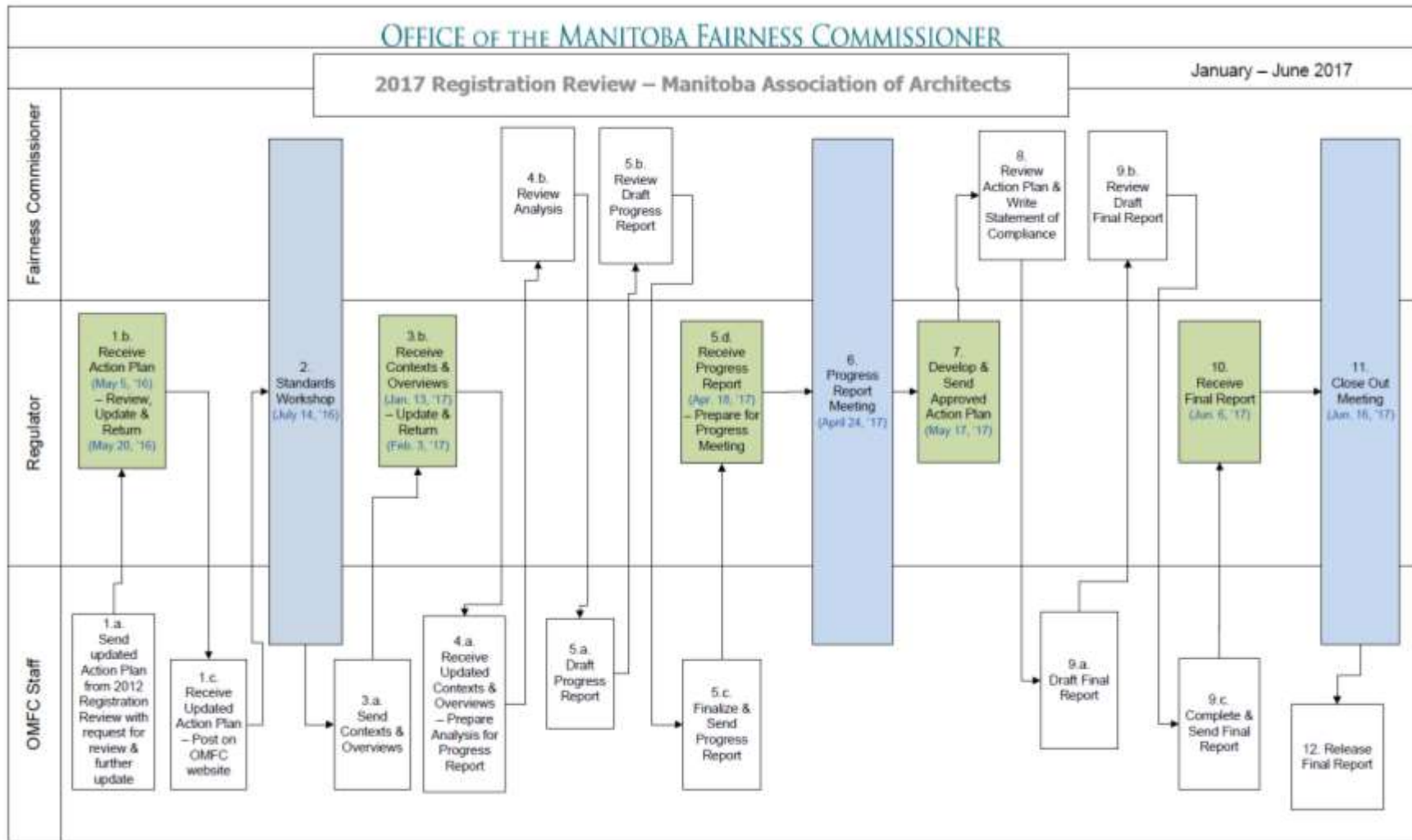
Appendix II: 2017 Registration Review Process

The OMFC’s review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
Registration Review Workshop	<ul style="list-style-type: none"> • Group meeting between OMFC and regulators • Latest data and research presented • Fairness Standard, review focus and process presented • Review schedule provided 	July 14, 2016
Progress Report	<ul style="list-style-type: none"> • Report on MAA’s fair practice progress • Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities • Progress opportunities identified • Recommendation from Fairness Commissioner to address progress opportunities 	April 18, 2017
Progress Meeting	<ul style="list-style-type: none"> • MAA and Fairness Commissioner discuss report and possible actions MAA is considering addressing progress opportunities 	April 24, 2017
MAA Action Plan	<ul style="list-style-type: none"> • MAA’s Action Plan submitted to OMFC 	May 17, 2017
2017 Registration Review Report	<ul style="list-style-type: none"> • Report submitted to MAA • Report contains the review findings, MAA’s Action Plan, and the Fairness Commissioner’s Compliance Statement 	June 6, 2017
Registration Review Closeout Meeting	<ul style="list-style-type: none"> • MAA and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how MAA’s action plan will inform the relationship moving forward • Registration Review Report submitted to Minister of Education and Training and uploaded on OMFC website 	June 16, 2017

Review participants:

Judy Pestrak, Executive Director, MAA
 Verne Reimer, Immediate Past President, MAA
 Martin Kuilman, President, MAA
 Robert Winslow, First Vice President, MAA





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