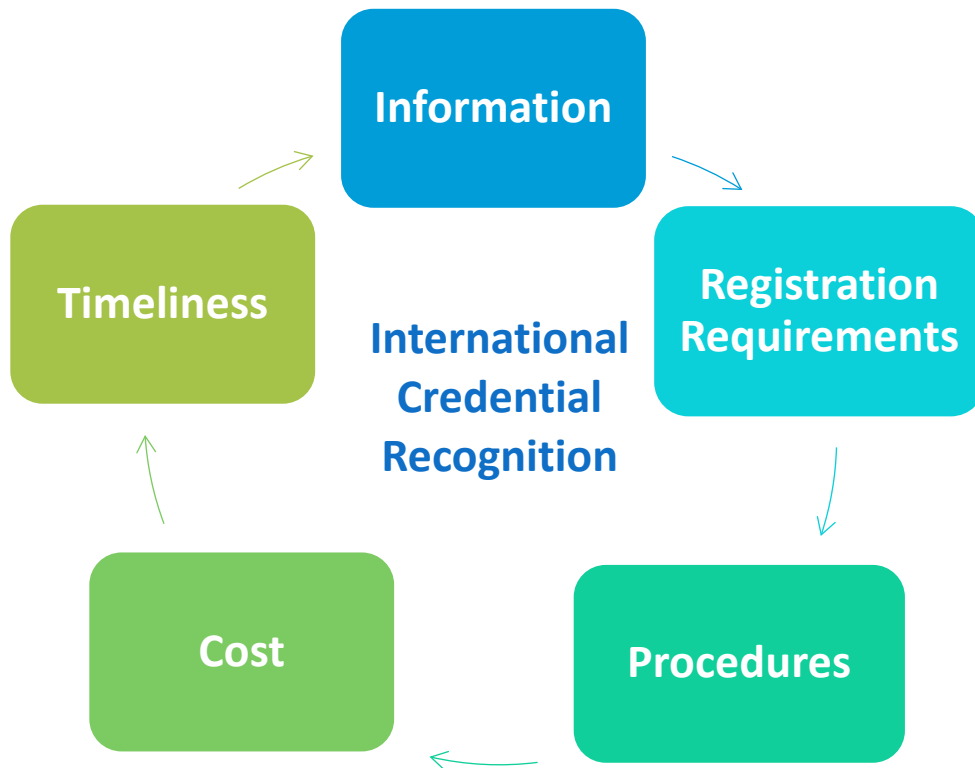


# Performance Review Report

## 2022-2023



**OSPG**

Office of the Superintendent  
of Professional Governance

# Performance Reviews – Background

The Professional Governance Act (PGA) sets out duties and responsibilities of the Superintendent in relation to oversight of regulatory bodies, including to:

- superintend the governance by regulatory bodies of registrants in the regulatory bodies’ respective regulated practices to ensure compliance by the regulatory bodies with their duties; and,
- monitor regulatory bodies for consistency in governance of registrants and performance standards of registrants.

At the time the PGA was brought into force in 2021, the Office of the Superintendent of Professional Governance (OSPG) published a general framework for conducting performance reviews of regulatory bodies.

A “familiarization review” was conducted between May 2021 and April 2022 for each of the five regulatory bodies under the PGA at that time, seeking to enhance the OSPG’s understanding of how each regulatory body is already meeting or planning to meet the Standards of Good Regulation. The results of the familiarization review are available on the OSPG’s website.

This year, the OSPG carried out a performance review for each regulatory body that underwent a familiarization review. Performance Reviews are reviews about planned topics; the OSPG determines which regulatory bodies will undergo a performance review and what the review will cover. There were two topics for review for each regulatory body this year, and this report covers the first topic that was the same for all regulatory bodies.

## Regulatory Bodies and Topics Selected

Regulatory Body	Performance Review Topic	Performance Review Topic
ASTTBC	International Credential Recognition	Standards of Competence, Standards of Professional and Ethical Conduct, and Practice Guidelines
BCIA		
CAB		
EGBC		Complaints and Investigations
FPBC		Diversity, Equity, and Inclusion

### Regulatory Bodies Reviewed in this Report

While the OSPG contributes to the Ministry of Post-Secondary Education and Future Skills’ mandate priorities related to international credential recognition across a broad suite of professions, the analysis in this report is specifically focused on the five regulatory bodies listed in schedule 1 of the PGA as of fall 2022:

- Applied Science Technologists and Technicians of BC (ASTTBC)
- BC Institute of Agrologists (BCIA)
- College of Applied Biologists (CAB)
- Engineers and Geoscientists BC (EGBC)
- Forest Professionals BC (FPBC)

# Performance Reviews – Process

When conducting performance reviews, the OSPG typically:

- Notifies the regulatory body in advance that a performance review will be conducted, and which topics will be covered in the review,
- Requests information for each topic from the regulatory body,
- Reviews the information and identifies areas where performance is being met and any areas that need improvement, and
- Makes recommendations for improvement of performance to the regulatory bodies.

The results of performance reviews are published on the OSPG website.

## International Credential Recognition

In recognition of government’s priority to quickly remove barriers and ensure that new international arrivals can find employment sooner in their field of training, the OSPG began planning for a performance review of international credential recognition in summer 2022. For the purposes of this performance review:

**“International registration”** means that an individual has been granted entry to practice by a regulatory body for equivalent practice in another country (e.g., is registered or licensed). For instance, an individual has been practicing as a biologist in the United Kingdom, registered with the Royal Society of Biology.

**“International education”** means that an individual obtained their education or part of their in a country other than Canada.

The information in this report includes descriptions of:

- The information currently available to individuals with international registrations seeking to register with the regulatory bodies.
- Registration requirements for individuals seeking to register.
- The procedures used by regulatory bodies to assess applications.
- The data collected by regulatory bodies in relation to internationally trained professionals.
- The costs associated with registration for individuals with an international registration or education.
- The timeliness of the registration process for individuals with an international registration or education.

In addition to providing information on the items above, this report includes a list of potential opportunities to improve the procedures associated with recognition of international registration and education.

Because this performance review is taking place in the context of a broader initiative related to international credential recognition within the Ministry of Post-Secondary Education and Future Skills, this report focuses on communicating the current state for each of the five regulatory bodies and identifying general opportunities and fair practices (which may be relevant to a broader group of regulators). As the Ministry’s broader work related to international credential recognition progresses, specific recommendations may be communicated to each regulatory body.

Minister of State for Workforce Development Andrew Mercier’s mandate letter provides direction to “*work with the Minister of Post-Secondary Education and Future Skills to pass legislation related to the Office of the Superintendent of Professional Governance that will govern the recognition of foreign credential standards to quickly remove barriers and ensure that new international arrivals can find employment sooner in their field of training.*” The practices described in this report reflect the current state in 2023, which may not yet be fully in alignment with the expectations to be established through the Minister of State’s work on this initiative.



ASTTBC has published information on their [website](#) that is specifically tailored to international applicants, including a handbook and a step-by-step description of the application process. At the national level, ASTTBC is part of Technology Professionals Canada, which has developed an [online self-assessment tool](#) for prospective applicants to help them determine their eligibility.

Through its membership with Technology Professionals Canada, ASTTBC recognizes the International Engineering Alliance international agreements and accords that apply to technologists and technicians including:

- The [International Engineering Technologists Agreement](#),
- The [Agreement for International Engineering Technicians](#),
- The [Sydney Accord](#) (for Engineering Technology programs), and,
- The [Dublin Accord](#) (for Engineering Technician programs).

Applicants who have completed an accredited education program from a country listed in either Accord are considered in the same entry stream as graduates of accredited Canadian programs.

Applicants from all non-accredited programs must submit their transcripts as well as an assessment from a third-party assessment service. ASTTBC’s credentials committee assigns two volunteers to conduct their assessments. Volunteer assessors are selected based on their qualification; ASTTBC also provides additional training to their volunteer assessors.

ASTTBC’s [English language proficiency policy](#) identifies several options to meet the English language skills competency, including alternatives to English language testing.

The ASTTBC Board has approved the removal of the one-year Canadian work environment requirement for registration. ASTTBC is implementing a tool to assess discipline-specific work competencies which will ensure that those applying for registration have the appropriate knowledge in applying local codes and standards. Additionally, ASTTBC is developing a Canadian work environment training module that will focus on Canadian workplace culture, including workers’ rights, workplace safety, socio-cultural competency, and the importance of communication in specific industry-based applied science and engineering contexts in a Canadian setting.

Year	Total Registrants	Total new Registrants	New Registrants (international registration or education)
2021	7711	357	21
2022	6669	457	26

**Fair Practice:**

ASTTBC have put considerable effort into providing information on their website that is specifically tailored to international applicants, including dedicated pages and a handbook laying out their registration process for international applicants.



General information for applicants is available on BCIA's website. In many countries, agrology is not a regulated profession with reserved practice or reserved title; while an individual may have a post-secondary education in agrology and worked in agrology in their country of origin, they are unlikely to have a registration issued by a regulatory body that is equivalent to the credential issued by BCIA.

There is no separate application stream for individuals with an international education – regardless of where an applicant obtains their education (in Canada or otherwise), they are required to engage in a 2-year articling period before being granted full status registration. Applicants with 6-14 years of relevant work experience may apply for a reduction to one year of articling with the experience to be from any location (including outside of Canada). BCIA recently eliminated the requirement for at least two years of this work experience to be within Canada. This places the international applicant on an equitable level with those presenting national or domestic experience.

BCIA also has an expedited registration program that waives the formal articling requirement for applicants who have at least 15 years of work experience in agrology with the experience to be from any location including outside of Canada. Under the expedited program it is expected that an eligible applicant is currently employed or has an offer of employment in an agrology-related field at the time of application.

BCIA requires applicants with an international education to obtain a third-party assessment of their transcripts and provide the comprehensive credentials assessment report as part of the application package. No formal English language testing is required; communications/writing courses are identified foundational knowledge courses and are beneficial if presented; articling registrants also demonstrate communication competency through the requirements of the articling program.

BCIA typically processes applications from individuals who have an international education within six to eight weeks of receiving a completed application; complex application may take longer to process. Those individuals who obtained their education in a country with strong post-secondary agricultural programs often receive a decision in a timely manner.

BCIA does not require applicants to be located in BC when applying for registration, though it is encouraged. An acceptance can be issued before an individual has arrived in BC but is conditional to arriving in BC with potential employment in agrology. The articling term will only start upon securing employment in the field of agrology. After arrival in BC, BCIA activates registrant status on the condition that outstanding registration obligations, if any, are completed (e.g., articling program, additional educational requirements).

Year	Total Registrants	Total New Registrants	New Registrants (international registration or education)
2021	1807	122	13
2022	1883	143	22

**Fair Practice:**

An acceptance can be issued prior to an individual's arrival in Canada, on the condition that the application relates to agrology employment within BC.



CAB has information on its website specifically tailored to [internationally trained applicants](#), including a [self assessment tool](#).

CAB has a [mutual recognition agreement](#) with the Royal Society of Biology in the UK, allowing individuals registered as Chartered Biologists to apply through a streamlined registration process to become a Registered Professional Biologist in BC.

In many countries outside the UK and Canada, applied biology is not a regulated profession with reserved practice or reserved title. Therefore, while an individual may have a post-secondary education in applied biology and may have worked as an applied biologist in their country of origin, they are unlikely to have a registration that is equivalent to the registration granted by CAB.

For internationally trained applicants not registered with the Royal Society of Biology, the registration process is the same as the registration process for any individual that graduates from a domestic biology program that is not accredited by CAB, with one additional requirement. CAB requires these individuals to have their transcripts from an international educational institution outside of Canada or the United States of America undergo an academic evaluation assessment and provide a comprehensive assessment report. These are completed by one of the six members of the Alliance of Credential Evaluation Services of Canada (ACESC). Once an application is complete, including the assessment report, the typical timeframe to review this type of application is eight to ten weeks.

CAB does not require individuals to reside in BC to apply and register. In fact, several registrants reside and practice in other parts of Canada and internationally while still being registered and regulated with CAB.

Communication skills of all applicants (regardless of the place of education) are assessed through a communication competency. For some registrant categories the application process also requires the submission of professional work products to meet the communication competency requirement. No requirement for English language testing is identified in the [credentiaing standard](#).

Year	Total Registrants	Total new registrants*	New Registrants (international registration)
2021	2972	408	3
2022	3221	386	1

This table only includes the number of registrants who have an international registration. CAB does not currently track data on applicants with an international education.

\*Only includes individuals who applied to join and were not previously a registrant

### Fair Practice:

All applicants for practicing registrant categories are required to have work experience, but CAB allows that work experience to be obtained in any country.



In general, an applicant for the engineering or geoscience profession requires the equivalent of a 4-year bachelor’s degree in either engineering, applied science, geoscience, or technology. EGBC has tailored information for international applicants on their [application page](#). Through the <https://engineerhere.ca/> site maintained by Engineers Canada, prospective international engineering applicants can also learn about the process to become licensed in Canada, as translated into 11 languages. Similar information is also available for prospective international geoscience applicants through the <https://geoscienceincanada.ca/> site maintained by Geoscientists Canada.

With Engineers Canada being a signatory of the Washington Accord, EGBC recognizes accredited engineering programs from over 20 signatory countries. EGBC recognizes the mutual recognition agreements established by Engineers Canada for applicants registered at the chartered professional level with three engineering regulators (Australia, Hong Kong, and Ireland) and one geoscience regulator (Ireland). For geoscience applicants, EGBC has adopted the Geoscience Knowledge and Experience Requirements for Professional Registration in Canada maintained by Geoscientists Canada.

For applicants who have obtained their education from non-accredited programs, EGBC undertakes an internal academic assessment and an experience assessment using a competency-based system; no third-party services are required. Competencies are observable and measurable skills, knowledge, abilities, motivations, or traits required for professional registration that are demonstrated through the actions and behaviours of the applicant. Self-reporting (with verification from validators and volunteer assessors) allows applicants to show evidence of how their experience satisfies the competencies. For applicants who do not meet the academic requirements, EGBC may identify knowledge gaps and assign examinations. However, experience interviews may be offered to potentially exempt these applicants from having to complete the examinations.

To obtain full licensure, 4 years of experience under the supervision of a professional are required, including demonstration of Canadian Environment Competencies. These competency requirements include Canadian regulations, codes, standards, quality control, safety awareness, professional accountability, and communication – but the strict requirement to obtain these competencies through Canadian work experience has been eliminated. Applicants can prove equivalence of the Canadian Environment Competencies through internationally gained work experience. EGBC also has the option to assign the Working in Canada Seminar as a supplement for applicants who lack direct experience in a Canadian workplace (or equivalent) but have demonstrated strong knowledge and abilities in all competency areas.

Language requirements can be demonstrated through the communications competencies in the competency-based assessment system, the comments of validators, and (if applicable) the comments of interviewers. A language test is required only if specifically assigned or requested by EGBC.

EGBC’s website states that it takes approximately 4 to 6 months to review an application after all documents are received. However, because the registration process has multiple pathways, review times can be much quicker.

Licence Type	Total Registrants (2022)	Total new registrants (2022)	New Registrants (international registration or education)
P. Eng	39,764	1794	593
P. Geo		124	35

**Fair Practice:**  
EGBC developed a competency-based assessment system where applicants self-report online how their experience meets specific competency requirements for the profession. The applicant’s self report is verified by validators and assessors.



General information for applicants is available on FPBC's website, including an eligibility assessment tool and information for internationally trained applicants maintained by the Forest Professional Regulators of Canada. Forestry is not a regulated profession with reserved practice or reserved title in many countries; while an individual may have a post-secondary education in forestry and worked in forestry in their country of origin, they are unlikely to have a registration that is equivalent to the registration issued by FPBC.

All internationally trained applicants:

- must include an educational credential assessment conducted by a third-party agency; and,
- if their education is not approved by the FPBC board, their core competencies in professional forestry must also be assessed:
  - nationally through the Forest Professional Regulators of Canada (for registered professional foresters); or,
  - provincially by FPBC (for registered forest technologists).

If an application is approved, applicants are granted temporary registrant status as an Allied Science Trainee. Regardless of where an Allied Science Trainee obtains their education, they are required to engage in an articling period (obtaining 24 months of supervised professional work experience in BC and completing additional learning/exam modules) before being granted full, independent practising registration.

While no formal English language testing is required as part of the FPBC application process, proficient communication in English is important for career success in the forestry sector.

In conjunction with the University of British Columbia, FPBC has also developed a series of challenge exams for the profession of forestry. These exams can be used to demonstrate required competencies for Allied Science Trainees who wish to appeal their assessment results, or for applicants, such as refugees, who are unable to access the required education records from their country of origin.

Once all application materials have been provided, FPBC has an eight-week performance standard for review and approval of applications from individuals who have not graduated from FPBC approved programs, including those with an international registration or education. Applications are typically reviewed within four to six weeks.

Year	Total Registrants	Total New Registrants	New Registrants (international registration or education)
2021	5499	145	15
2022	5367	78	14

### Fair Practice:

Challenge exams developed in conjunction with the University of British Columbia that allow applicants to appeal assessment results through active demonstrate competency can provide a fair, objective means to assess competency when records of education are not available.



# Performance Review Summary

## For regulatory bodies reviewed in this exercise:

- Other than EGBC, applicants with international registrations or educations do not represent a large proportion of annual applications.
- Efforts are being made to provide transparency about the registration process to international applicants, including tailored webpages and self-assessment tools.
- Many efficiencies have already been identified, resulting in process changes that have reduced challenges and barriers that are specific to applicants with international registrations or educations, including:
  - Competency-based assessment systems,
  - Expedited registration processes,
  - Challenge exams to demonstrate competency in the absence of educational records,
  - Flexibility on how an applicant demonstrates English language proficiency,
  - Mutual recognition agreements with professional regulators in other countries, and,
  - Accreditation of education programs offered in other countries.
- Applicants with international education and domestic education from unaccredited programs typically undergo the same review process once a complete application has been received by the regulatory body.
- Some regulatory bodies admit all applicants without any work experience, regardless of country of origin, directly to a trainee category, requiring completion of an articling period to obtain full registration. While in the trainee category, registrants are authorized to practice under supervision while they complete the remaining obligations.
- There is some reliance on volunteer labour to review applications from prospective registrants who have not completed an accredited program.
- Other than for EGBC, applicants with international registrations and educations are required to obtain reports from third party assessment services, adding additional time and expense to prepare a complete application for the regulatory body (compared to domestic applicants with an education from an unaccredited program).
- Some regulatory bodies have specifically developed policies and procedures to further recognize the unique set of challenges faced by refugees when trying to obtain documents required for their applications.
- There is a lack of consistency in the data that is tracked in relation to volume and processing timelines of international applications.

## Opportunities for Regulatory Bodies

The following opportunities are highlighted for regulatory bodies who participated in this review as well as for the broader community of regulatory bodies in British Columbia and beyond. Specific opportunities pursued may depend on the characteristics of a profession and organization (e.g., financial resources, registrant base, volume of international applicants, access to paid and volunteer resources).

<b>Information</b>	<ul style="list-style-type: none"><li>• Regulatory bodies can develop a routine practice of evaluating the needs and experiences of international applicants to inform process updates and information availability.</li><li>• Regulatory bodies can consider including information on their websites on how to access immigrant support services, including <a href="#">Welcome BC</a>.</li><li>• Regulatory bodies that have accredited programs, mutual recognition agreements, or accords can highlight these on their website to ensure applicants know how they may apply to their specific situation.</li><li>• Regulatory bodies can be transparent about any differences in the information required for individuals with an international education versus an individual with an equivalent international registration.</li></ul>
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<b>Registration Requirements</b>	<ul style="list-style-type: none"><li>• Regulatory bodies can consider eliminating Canadian work experience requirements and using alternative modes of assessing Canadian environment competencies.</li><li>• Regulatory bodies can consider flexible options for demonstrating English language competency.</li><li>• Many regulatory bodies require official transcripts from educational institutions. We understand that a barrier is posed when educational institutions will only issue transcripts to individuals in-person. Regulatory bodies can develop alternative means to provide verified transcripts (such as the transcripts provided to third party credentials assessment agencies or electronically by the educational institution) such that an applicant is not required to return to the country where they received their education to obtain copies of their transcript.</li><li>• Regulatory bodies can develop policies and procedures, such as competency-based assessments and challenge exams, that allow for a demonstrable assessment of credentials and competency for candidates that cannot access copies of their transcripts or provide documents. This is especially applicable to refugees and individuals who have safety concerns about returning to a particular country.</li><li>• Regulatory bodies can ensure that information about acceptable third-party agencies for credentials assessments is included on their website.</li></ul>
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## Opportunities for Regulatory Bodies

<b>Procedures</b>	<ul style="list-style-type: none"><li>• Regulatory bodies can seek to recruit at least one individual with international training to the committee that reviews applications. Such individuals can bring awareness to the challenges international applicants sometimes face during the application process and identify potential solutions.</li><li>• If early indications are that an application will take longer than normal to process, consider setting up regular check-ins with the applicant so they can be informed if they need to gather any supporting documents.</li></ul>
<b>Cost</b>	<ul style="list-style-type: none"><li>• Consider developing a financial hardships policy so that applicants who are experiencing financial difficulties can apply to have their application fee reduced or deferred.</li><li>• Consider publishing registration requirements in format that facilitates use of translation apps or website (e.g., easy to copy and paste, minimal complex formatting).</li><li>• Consider if it is necessary to have original copies of transcripts or if those used for other formal processes (e.g., immigration) will suffice. The regulatory bodies reviewed in this report have already shifted away from the practice of requiring multiple copies of transcripts.</li><li>• To ensure applicants have a full picture of the costs associated with completing an application before stating the process, regulatory bodies can include a complete list of the fees associated with an application involving international registration or education. If the cost is unknown or not set by the regulatory body, the regulatory body can still identify that the applicant may be required to pay a fee for the action (i.e., a fee may be required for you to obtain a copy of your transcripts; a fee may be required for the third party to assess your credentials for your application to register).</li></ul>

# Opportunities for Regulatory Bodies

## Timeliness

- Where it makes operational sense for a given profession and country of origin, regulatory bodies can consider developing mutual recognition agreements and/or accords to reduce the length of time it takes to process an application for individuals who have an equivalent education or registration.
- Regulatory bodies who rely on volunteers to assess applications should consider strategies to incentivize volunteerism so that there are an adequate number of assessors to process current and possibly increasing international applications.
- Regulatory bodies can continue efforts to build, improve and share databases of international educational programs that assist their assessors to process applications.
- Many regulatory bodies require registrants to complete an articling period before being granted full registrant status. Regulatory bodies can consider opportunities or partnerships to assist trainees in matching with prospective employers so the articling period can be completed, and full registrant status obtained (provided such initiatives do not create a conflict of interest for the regulatory body).
- Regulatory bodies can review their procedures on a regularly scheduled basis to identify what can be done to reduce the amount of time it takes for an application to be reviewed.