ACADEMIC REQUIREMENTS AND ACCEPTABLE ALTERNATIVES: CHALLENGES AND OPPORTUNITIES FOR THE REGULATED PROFESSIONS IN ONTARIO

The Office of the Fairness Commissioner is an arm's-length agency of the Ontario government, established under the Fair Access to Regulated Professions and Compulsory Trades Act, 2006. Its mandate is to ensure that certain regulated professions and trades have registration practices that are transparent, objective, impartial and fair.

ACADEMIC REQUIREMENTS AND ACCEPTABLE ALTERNATIVES: CHALLENGES AND OPPORTUNITIES FOR THE REGULATED PROFESSIONS IN ONTARIO

Contents

List of Tables

Message from the Commissioner

I am pleased to present the study, *Academic Requirements and Acceptable Alternatives: Challenges and Opportunities for the Regulated Professions in Ontario*.

The purpose of the research was twofold: to compile information about the academic requirements that Ontario regulatory bodies demand and to describe the alternatives they are willing to consider when they judge someone's application.

The requirements are sometimes quite rigid and the alternatives hard to get, costly, or unsustainable.

Mostly, of course, this affects people who are internationally educated — the very highly skilled people Ontario so urgently needs. They grapple with a licensing system that undervalues their international qualifications and underrates their overseas experience.

I call on regulatory bodies to be more flexible in their assessments and to boost the alternatives they accept.

Regulators and government officials both have a responsibility to act in the public interest, to find acceptable alternatives to this waste of human resources.

Ad-hoc innovation is not enough. Our collective future depends on long-term vision and a commitment to immigrant success.

I hope this study draws attention to this compelling topic.

Sincerely,

Hon. Jean Augustine, PC, CM
Fairness Commissioner
November 15, 2013

Executive summary

Internationally educated people often struggle to meet the academic requirements for licensing in a regulated profession in Ontario. This study, *Academic Requirements and Acceptable Alternatives: Challenges and Opportunities for the Regulated Professions in Ontario*, examines fair-access issues related to those requirements. It focuses principally on 38 professions under the mandate of Ontario's Office of the Fairness Commissioner. The study presents these professions' standard academic requirements, discusses their flexibility in recognizing "acceptable alternatives" to these requirements, and examines fair-access issues for those alternatives.

The challenge for internationally educated professionals

Canada's immigrants often arrive with high levels of education and may have been licensed to practise a profession. But they often find it challenging to become licensed here.

In some cases, the challenge lies with differences in requirements: applicants who practised their profession with an undergraduate degree in their home country may need a graduate degree to practise here. In other cases, applicants have difficulty showing the equivalence of their education.

National and provincial governments, and many regulatory bodies, have worked to bring increased flexibility to the licensing process for the regulated professions. Their efforts have included improvements to the recognition of international credentials, and innovations in competency-based assessment and training.

Increasingly, regulatory bodies are identifying acceptable alternatives for meeting the academic requirements to become licensed. These include alternative ways for applicants to develop competencies and alternative ways in which these competencies can be demonstrated or assessed.

Acceptable alternatives in Ontario professions

The professions' academic requirements vary, from college diplomas, to general BAs, to post-graduate academic or professional degrees.

Almost all professions have a mechanism for accepting alternatives to their standard academic requirements.

Five types of acceptable alternatives that are available in various professions include:

- paper-based assessment of education and experience (available for 10 professions)
- direct assessment of knowledge and skills (e.g., exams) (16 professions)
- self-paced learning (20 professions)
- bridging programs (13 professions)
- advanced standing in academic or professional degree programs (at least 5 professions)

Each type of alternative can help improve applicants' access to licensing, and each also presents challenges. For example, time commitments and costs vary widely, and are often extremely significant.

Some alternatives also face sustainability challenges, due to uncertain or project-based funding.

Nationally, there is a significant correlation between the accessibility of acceptable alternatives and reduced disadvantage for internationally educated professionals.

Conclusions and recommendations

Acceptable alternatives bring new flexibility to the licensing process, but they do not remove all barriers for internationally educated professionals.

Regulators must still ensure that academic requirements are relevant and necessary to the practice of the profession. Acceptable alternatives must be developed with careful attention to accessibility, affordability and sustainability.

Educational institutions and governments are key partners in sustaining acceptable alternatives and maximizing their fair-access contributions. For lasting impact, programming that helps internationally educated professionals to bridge competency gaps must be better integrated into the core work of post-secondary education. And governments must commit ongoing funding and support participants with adequate financial aid.

The Office of the Fairness Commissioner makes 11 recommendations to regulatory bodies, educational institutions, and government.

1. Introduction

Poor returns on immigrants' education

Today's immigrants in Canada are more highly educated than ever before. However, these immigrants are seeing poor returns on the educational investments they made before coming to Canada. Over the past three decades, the earnings of Canada's immigrants have steadily declined compared to the earnings of their Canadian-born counterparts.[1]

Better ways to recognize credentials and skills

Response to the decline has focused on finding better ways to recognize international qualifications, especially for people educated in a regulated profession. As a result:

- Professions' regulators and credential-assessment agencies have worked hard to identify and implement promising practices in the assessing of academic credentials from other countries.
- Federal and provincial governments have provided new funding to help develop competency assessments and bridge training programs.

These initiatives have helped to expand the focus of assessment from applicants' paper credentials to their actual competencies, and to introduce new and flexible alternatives for developing and recognizing the required competencies.

Changes in Ontario

Ontario's Office of the Fairness Commissioner (OFC) was created through the passing of fair-access legislation in 2006.[2] Since 2007, it has been tracking changes made by many of Ontario's regulated professions. Between 2007 and 2012, 13 Ontario professions introduced changes with regards to acceptable alternatives that applicants can use to meet the requirements for licensing in those professions. These changes included:

- introducing provisional and restricted licences to help internationally educated applicants meet work-experience requirements
- recognizing competency assessments and bridge training programs as acceptable alternatives for meeting academic requirements

However, for the most part, the requirements themselves have not changed. It is a basic principle of self-regulation that the profession itself establishes the registration requirements that are considered necessary to ensure safe and competent practice of the profession.

Therefore, the OFC cannot directly mandate changes to licensing requirements.

However, the OFC can:

- call on a profession to critically analyze the necessity and relevance of its requirements
- use the OFC assessment process to recommend strategies that regulators can use to ensure that their requirements and assessment methods are transparent, objective, impartial and fair

Purpose of this study

This study explores licensing challenges that internationally educated applicants continue to face in meeting academic requirements for licensing in Ontario. In particular, it analyzes the effectiveness of initiatives designed to accommodate differences in educational training received outside of Canada. These "acceptable alternatives" include alternative ways to acquire professional competencies and alternative ways in which these competencies can be demonstrated or assessed.

The study focuses on the following questions:

What kinds of acceptable alternatives exist for meeting formal academic requirements?
What challenges limit the success of these alternatives? How can these be overcome?

This focus addresses an important gap in the research literature, where there has been little systematic analysis of acceptable alternatives for meeting academic requirements. The study offers a brief review of the existing research literature on this subject, but focuses mainly on an in-depth analysis of reports and information that regulators have submitted to the OFC.

Many acceptable alternatives are relatively new. Regulators and education-providers have much to learn from each other, regarding the strengths and limitations of different approaches they have taken. At the same time, federal and provincial governments can also learn from these experiences with acceptable alternatives, to better target their funding and to ensure the sustainability of fair-access interventions.

The analysis that follows seeks to contribute to continuous improvement in the designing and implementing of acceptable alternatives for meeting licensing requirements. The analysis will pay particular attention to the alternatives' accessibility, affordability, efficiency and effectiveness.

Organization

This study is organized in the following sections:

- Section 2 offers a brief review of relevant background information and research literature on the undervaluing of international qualifications, both in Canada and around the world.
- Section 3 discusses the methods and sources used for this study.
- Sections 4 through 8 present the study's analysis:
    - Section 4 introduces the policy context and regulatory framework that shape challenges and opportunities related to academic requirements for licensing and acceptable alternatives for meeting those requirements, among regulated professions in Ontario.
    - Section 5 documents the standard academic requirements of 38 regulated professions in Ontario that are under the mandate of the OFC, and the processes for accrediting or approving programs that meet those requirements.
    - Section 6 discusses the registration regulations for these professions and the degree of flexibility the regulations allow for meeting academic requirements.
    - Section 7 describes approaches for using acceptable alternatives to meet academic requirements. It examines five common types of acceptable alternatives and their availability and fair-access implications in the Ontario professions under the OFC's mandate.
    - Section 8 explores the positive correlation between the availability of acceptable alternatives and improved access to the professions.
- Section 9 presents conclusions.
- Section 10 provides the OFC's recommendations to regulators, educational institutions, and government.
- The Glossary of terms defines terms and abbreviations used in this study.

2. The undervaluing of international qualifications

This section presents a brief review of research that explores the persistent undervaluing of international qualifications in Canada and around the world, some contributing factors, and observers' conclusions.

Existing research

A significant body of research has documented the challenges that internationally educated people face when they try to get work in Canada.

However, most studies have tended to either:

- address immigrant access to all occupations, without distinguishing between regulated and non-regulated occupations
    or
- focus on one large profession, such as nursing or engineering

Further, except for a few profession-specific case studies presented at conferences on prior learning assessment, there has been little systematic exploration of the use of acceptable alternatives to introduce flexibility into the licensing process for regulated professions.

This study addresses that gap.

The study also builds on existing literature that shows the continuing undervaluing of immigrants' education in the Canadian labour market. One study showed that two-thirds of recent immigrants with a university education were working in occupations that usually required no more than a college education or an apprenticeship.[3]

Such findings illustrate the urgency of developing new strategies to overcome licensing barriers, in order to more effectively mobilize the knowledge and skills of internationally educated professionals.

Global comparisons: Recognizing qualifications

Canada is not alone in facing these challenges for immigrants. A 2009 European study showed that 36% of working-age immigrants born outside of the European Union (EU) were overqualified for their jobs, compared to 28% of those born in the EU and 21% of those who were born in the EU country where they were working. To help address this key policy challenge, the European Commission recently supported a major study on the recognition of migrants' qualifications.[4]

That study notes several important developments since the year 2000. For example:

- Countries such as Denmark and Germany introduced new legislation to govern the recognition of foreign qualifications.
- Databases and assessment services have helped to ease the recognition of international qualifications.
- There has been a gradual trend towards competency-based assessment of formal and informal learning.

EU citizens typically face fewer barriers, while people from countries outside the EU often face limited access to both professional recognition and permanent residence.

Drawing on case studies from Australia and Canada, the EU study recommends initiatives such as:

- bridging programs
- competency-based assessments
- courses that help applicants prepare for exams

At the same time, the study stresses the important role that mutual recognition agreements between different jurisdictions can play in easing the recognition of foreign qualifications and enhancing mobility.

Global comparisons: Language assessment and learning

Innovations in the assessing and recognizing of qualifications have an important role to play in correcting the undervaluing of immigrants' education. However, other barriers — such as those related to language assessment and learning — must also be addressed.

Recent Australian research has called for improving the assessment of internationally educated health professionals' language skills. It notes that native English speakers often fail to achieve the language benchmarks that internationally educated applicants need to reach to become licensed. The research urges regulators to carefully analyze the language competencies required for professional practice, rather than uncritically adopting benchmarks established by other regulatory bodies.[5]

Better learning methods are also critical. In Canada, many internationally educated professionals are frustrated by the slow pace and generic nature of intermediate language programs. Despite recent growth in advanced training in occupation-specific language skills, access to these programs is still limited.[6]

The time lost to meeting language benchmarks — as much as five years — can be significant. Extended time away from practice can contribute to the deterioration of applicants' professional skills and a lack of up-to-date knowledge. This significantly lessens the applicants' chances of becoming licensed.

Employer preferences and labour-market realities

In Canada, internationally educated professionals face a variety of barriers, at both the individual and system level.[7] Language difficulties are a frequent and obvious barrier. But there are other, often-overlooked barriers.

For example, employers prefer applicants who have Canadian experience. This "Canadian experience" barrier is so prevalent that the Ontario Human Rights Commission recently warned employers and regulatory bodies that rejecting applicants on this basis may constitute a human rights violation.

Employers tend to hire immigrants into positions that do not reflect their education and experience. A Toronto research roundtable identified concerns about the emerging trend of "skills hoarding" — where employers benefit from workers' higher-level skills without ever opening doors to jobs and salaries that are appropriate for those skills.[8]

Research on temporary foreign workers has also pointed to employers' preference for overqualified candidates.

Temporary foreign workers coming through low-skilled pathways face even greater obstacles, as their employment at low-skill jobs makes them ineligible to apply for permanent residence status under the Canadian Experience Class. Because their work visa ties them to a specific employer or sector, many temporary workers have no way forward to employment that is appropriate to their skills.[9]

Immigration policy

Over the last decade, temporary migration — both skilled and low-skilled — has grown rapidly in Canada. This has created new challenges for qualification recognition. It has also driven various changes in the regulation of professions. For example:

- Many Ontario regulatory bodies have moved away from requiring citizenship or permanent residence and now accept applicants with appropriate work authorization from Citizenship and Immigration Canada.
- Some professions have created provisional-licence or limited-licence categories to allow applicants to enter the labour market earlier.

However, there remain serious contradictions between the "just-in-time" orientation of temporary migration programs and the complexities of the licensing process for regulated professions.

To improve economic outcomes for immigrants, government policy-makers have repeatedly adjusted the way Canada selects skilled immigrants. The Immigration and Refugee Protection Act (2002) introduced a human-capital model that awarded points based on language, education and work experience, while later changes brought back a priority-occupations list.

However, changing selection criteria alone has been largely ineffective in helping to appropriately integrate immigrants into the economy.

Census data shows that immigrants earn significantly lower amounts than their Canadian-born counterparts. In 2006, the average annual income of university-educated immigrants in their prime working years was just over half that of their Canadian-born counterparts.[10] Another study of pre- and post-migration employment showed that 48% of immigrants were employed in occupations requiring university training before they came to Canada. Only 23% were employed in such occupations four years after landing.[11]

Research implications: Removing barriers and improving supports

Improving the process for selecting immigrants is not enough:

- The 2009 *Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications* recognized the need to build a shared vision and active collaboration between governments and regulatory stakeholders to improve access to the professions and trades.[12]
- Ontario's immigration strategy recognizes the need for continued work to remove barriers and improve supports for successfully integrating immigrants into the Ontario labour market.[13]

Researchers who have focused on the regulated professions have recommended that regulators and governments target their help at the early years after immigrants arrive in Canada. The reasoning is that if immigrants are to succeed in entering their intended profession, that success is most likely to happen during these early years — or not at all. Long delays in getting licensed can lead immigrants to a downward economic spiral.[14] Prolonged unemployment or underemployment leads to deterioration of their professional skills and loss of confidence, which reduce their chances of getting appropriate work.[15]

Research indicates that interventions should aim to improve understanding of other jurisdictions' educational systems and increase the scope of mutual recognition agreements, while also building capacity to pinpoint and address applicants' competency gaps.

Currently, the region where immigrants were originally educated has a significant impact on their licensing and employment outcomes, as does their education after they arrived in Canada. Immigrants have better outcomes if they studied in countries with education systems and language of instruction that are similar to Canada's. So do immigrants who complete post-migration education in Canada.[16]

Observers note that regulatory bodies need funding and support from government to correct the generally poorer outcomes for immigrants. They have questioned the prospects for future progress on the recognition of foreign qualifications, given that much government funding has been project-based rather than ongoing.[17]

Researchers argue that several positive initiatives that need support include those designed to:

- improve recognition of international qualifications, in the most timely way possible
- enhance access to bridging programs, programs to help applicants prepare for exams, and occupation-specific language training, with appropriate financial aid

---

3. Methods and sources used in this study

This study of academic requirements and acceptable alternatives was carried out from December 2012 to August 2013. Its goal was to identify fairness issues related to academic requirements for licensing and acceptable alternatives for meeting those requirements, in 38 Ontario professions, by reviewing information sources readily available to the Office of the Fairness Commissioner (OFC).

The OFC oversees 40 regulatory bodies for Ontario professions and trades. Some regulatory bodies oversee more than one profession. This study:

- includes the 38 professions that have been actively registering members for more than one year
- does not include regulators that are just beginning to register members, or transitional councils that are still in the process of finalizing their registration regulations

As background to this study, a brief literature review analyzed major research findings related to the undervaluing of immigrants' education.

No primary research was undertaken.

Rather, data collection included:

- reviewing the academic requirements for licensing of 38 of the self-regulating professions that are under the purview of the OFC. Data about the requirements was gathered from these professions' registration regulations.
- reviewing acceptable alternatives for meeting academic requirements for registration. This data was gathered from publicly available registration information and from reports the professions submitted to the OFC.
- reviewing the following information about bridging programs for the regulated professions:
    - recognition by regulators
    - eligibility criteria
    - length
    - cost

    This data about bridging programs was gathered primarily from the websites of the bridging programs. Data was collected for all bridging programs listed on the Ontario Ministry of Citizenship and Immigration website.

To enrich the analysis, 10 reviewers were asked to comment on a draft version of this document. These reviewers have a broad range of expertise in research, the education of professionals, the regulation of professions, bridge training, and the integration of individuals and groups into the labour market.

For definitions that helped guide the data collection in this study (*academic requirement*, *acceptable alternatives*, and *bridging programs*), see the Glossary of terms.

4. Licensing and academic requirements

This section describes the policy context and regulatory framework that shape challenges and opportunities related to academic requirements for licensing and acceptable alternatives for meeting those requirements, among regulated professions in Ontario.

National public policy initiatives

In recent years, there has been a strong public policy focus in Canada on improving processes for recognizing and assessing foreign credentials, both for reasons of fairness and to maximize immigrants' contributions to the Canadian economy.

Some progress has been made.

For example, the *Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications* has helped to raise awareness and increase financial support for assessment and recognition initiatives by regulatory stakeholders (for example, provincial regulatory bodies and national organizations that deliver assessments and exams). At the same time, the framework has enhanced national coordination and harmonization of professional standards. This, together with labour-mobility legislation, helps professionals who are already registered in one Canadian jurisdiction to practise in another.

However, it is difficult to assess the framework's success in meeting its primary goal: to help immigrant professionals "use to the fullest their skills and experience within the Canadian labour market."[18] The federal government's latest progress report notes that Canada has not yet developed a strategy for measuring the framework's impact.[19]

Continued challenges for internationally educated professionals

Despite the *Pan-Canadian Framework*, internationally educated people seeking licensing in a regulated profession continue to face significant challenges.

In some cases, these challenges may be related to differences in the academic requirements for licensing in different jurisdictions for the same profession. For example, a person might have practised as a psychologist with a master's degree in his or her home country, but require a doctoral degree to be licensed in Ontario.

In other cases, the greater challenge for applicants may lie in demonstrating that their academic background is "equivalent" or "substantially equivalent" to the academic requirement in Ontario.

Some individuals also experience difficulties getting the transcripts and course descriptions they need to prove their academic achievements.

Self-regulation: Balancing competing interests

Regulating a profession involves defining acceptable qualifications and establishing a distinction between people who are qualified to practise the profession and those who are not.

On the one hand, this distinction protects the public from unqualified practitioners.

At the same time, it grants power, social status and higher income to the members of a closed group. This can lead to protectionism, where escalating academic requirements and restrictive licensing practices exclude new members unnecessarily.

Professionalization can therefore both serve and undermine the public interest. Sociologists have explored the relationship between professions and income inequality, and have documented patterns of exclusion on gender and racial lines.[20] At the same time, sociologists have recognized the positive role that specialized knowledge and an altruistic professional ethos can play in the self-regulation of professions.[21]

Regulators are pulled in different directions by their public-protection mandate and by the interests of their members. Progress on recognizing international credentials needs to be grounded in:

- recognizing the competing pressures on regulatory bodies
- redefining the public interest to include a diverse population of applicants to the professions and of beneficiaries of professional services
- reaffirming professional values of public service

At the same time, self-regulation must be balanced by oversight and accountability. Vigilance is required to ensure fair access to the professions, and to enrich their membership with the contributions of diverse applicants.

Public protection: Seeking assurance of knowledge and skills

In Ontario, as in other provinces, regulatory bodies are subject to intense public scrutiny and take seriously their mandate to protect the public interest. Given the variation in educational programs in different jurisdictions, regulators seek a high level of assurance that applicants have the knowledge and skills that are necessary to practise competently and safely.

In many cases, regulators do not understand the applicant's academic program well enough to have this level of assurance. Even in cases where a paper-based assessment of applicants' credentials suggests that the applicants have an academic background similar to the profession's requirements, non-traditional applicants[22] may have to undergo additional assessments or exams before regulators can recognize the "equivalency" of their academic qualifications.

For example:

- Internationally educated engineers and geoscientists whose education seems to be similar to Ontario's requirements may be asked to write "confirmatory exams" to further prove their knowledge, and those with identified gaps in education are assigned a series of technical exams.
- Many professions have an "evaluating exam" that internationally educated applicants must pass before becoming eligible to write the licensing exam.

Decreasing the burden for applicants

Gaps in regulators' understanding of international credentials can thus drive the development of alternative assessments and even bridge training, to address perceived gaps in academic training. While such alternatives are preferable to not recognizing the credentials at all, they frequently add to the complexity, length and cost of the licensing process.

To decrease the burden on applicants, the development of acceptable alternatives for meeting licensing requirements must be matched by improvements to credential-recognition processes and the expansion of mutual recognition agreements that allow for automatic full or partial recognition of credentials.[23] Currently, mutual recognition agreements are largely limited to English-speaking Commonwealth countries.

Regulators may also need to reflect on their experience with competency-based assessments, and to integrate this learning into their processes. For example, where applicants with a particular educational background are consistently successful on an assessment, it may be unnecessary to assess later applicants with that same background.

This can help streamline the recognition of qualifications and standardize requirements for those later applicants. For example, Professional Engineers Ontario's academic requirements committee has reduced the number of technical exams assigned to a particular group of applicants based on past performance on these tests by applicants with the same educational background.

By building on experience and improving qualification-recognition programs over time, regulators can offer targeted alternatives to applicants with true gaps in academic training, rather than bridge gaps in *assessors'* abilities to recognize international credentials. For this to happen, regulators may need more resources to conduct research, improve assessor training, and enhance objectivity.

Differential impact

Offering targeted alternatives is all the more important because of the different impact of existing academic requirements and qualification-recognition processes on different groups of applicants.

Some applicants benefit from the regulatory body's advance screening of their academic program, through either an accreditation or mutual recognition process. For these applicants, the licensing process is relatively streamlined. For example:

- Graduates of accredited programs are assumed to have met all academic requirements.[24]
- Applicants from jurisdictions that are recognized under labour-mobility legislation or an international mutual recognition agreement are exempt from any additional steps that are required of applicants whose educational program is unknown.

On the other hand, applicants from non-accredited programs and non-recognized jurisdictions must individually prove the equivalency of their education. Often this involves some form of competency assessment or bridge training to confirm that they have the required knowledge and skills to practise the profession in Ontario. Applicants not only bear the burden of proving their competency, but may also face significant challenges related to the time and cost associated with these extra assessments and training.

The challenges associated with meeting academic requirements may also vary depending on the length of the educational program required for licensing. Where required programs are relatively short (such as a college diploma), it may be easier for non-traditional applicants to repeat all or part of their studies through a regular academic program. Where programs are longer (such as a university degree), there may be a greater need for alternative pathways for demonstrating competencies and/or filling gaps in academic training.

Fair-access legislation

Ontario's fair-access legislation includes the Fair Access to the Regulated Professions and Compulsory Trades Act (FARPACTA) and corresponding provisions in the Regulated Health Professions Act (RHPA). This legislation recognizes the authority of self-regulating professions to specify licensing requirements and acceptable alternatives.

But it also introduces a new level of accountability:

- Regulators must critically examine the necessity and relevance of registration requirements in entry-to-practice reviews.
- Regulators must be transparent about all possible routes for meeting licensing requirements, and must provide information to applicants about "acceptable alternatives."

The Office of the Fairness Commissioner (OFC) follows up on issues identified in entry-to-practice reviews that the regulators submit, and monitors the transparency of acceptable alternatives. However, it does not exert direct influence over licensing requirements.

The fair-access legislation does establish two key principles that are critical to improving fair access to the professions:

- First, all requirements for licensing should be relevant and necessary to the practice of the profession.
- Second, competencies are more important than credentials.

Following these two principles, the OFC encourages regulators to identify "acceptable alternatives" for meeting licensing requirements.

5. Ontario professions: Academic requirements and accreditation processes

Most professions require some form of post-secondary education for licensing.

Indeed, the development of a separate field of academic knowledge is central to the process of establishing a profession. A profession presents itself as the knowledge authority in a particular field and defines acceptable qualifications for professional practice. The primary marker of qualification is usually a post-secondary education.

This section discusses the standard academic requirements for the 38 Ontario professions included in this study. It also shows the processes these professions use to accredit academic and professional programs.

Alternatives to the standard route for fulfilling academic requirements are discussed in section 6 and section 7.

Academic requirements

Among Ontario professions, academic requirements vary, but most professions require a university degree. As shown in Table 1:

- 23 professions require a graduate or undergraduate university degree.
- 14 require completion of a college program.
- The nursing profession licenses both college and university graduates, under different classes of registration.

Some professions also require a program of professional education or training, such as a post-graduate residency at a medical school or a professional program offered by one of the accounting regulators. Professional education and training requirements are distinct from educational requirements, and present unique challenges beyond the scope of this study. Acceptable alternatives to professional education requirements are often quite limited, as these requirements are very specifically linked to intensive practical training or work experience in Canada.

Accreditation and approval of academic programs

To address the risk of varying program quality, most regulated professions have established an accreditation or approval process for academic programs.[25] As shown in Table 1:

- 17 professions rely on an external accreditation body.
- 15 professions use an approval process specific to the regulatory body.
- The nursing profession has both accreditation and approval processes that are specific to a class of registration.

Compared to small professions, large professions and those requiring university degrees are more likely to have national or bi-national accreditation bodies. These professions tend to have a longer history and a stronger resource base.

Accreditation and approval processes specify what kind of academic program meets the standard for licensing.

Canadian programs are usually held accountable to this specific standard, although an increasing number of Canadian private career colleges offer non-accredited programs.

Non-accredited and international programs can be assessed in relation to an accredited or approved program, to determine whether an applicant meets the academic requirement or requires further training.

Table 1. Ontario's regulated professions: Academic requirements and accreditation/approval processes

PROFESSION	ACADEMIC REQUIREMENT[1] An applicant must have completed...	ACCREDITATION OR APPROVAL The academic program must be...
NON-HEALTH		
Architects	A degree in architecture from a post-secondary institution	Accredited by the Canadian Architectural Certification Board
Chartered Accountants	A four-year undergraduate degree / prescribed course credit requirements	Accredited by the Institute of Chartered Accountants of Ontario
Early Childhood Educators	A diploma from a program in early childhood education	Approved by the College of Early Childhood Educators
Engineering Technicians and Technologists	A two-year engineering technician/applied science diploma program or a three-year engineering technologist/applied science diploma program	Accredited by the Canadian Technology Accreditation Board
Engineers	A bachelor's degree in an engineering program	Accredited by the Canadian Engineering Accreditation Board
Foresters	A four-year science-based degree	Approved by the Ontario Professional Foresters Association
General Accountants	A four-year undergraduate degree / prescribed course credit requirements	Accredited by Certified General Accounts of Ontario
Geoscientists	A four-year bachelor of science degree in an area of geoscience	Approved by the Association of Professional Geoscientists of Ontario on the basis of meeting the course requirements set out in the document entitled "Minimum Knowledge (Academic) Requirements"
Land Surveyors	A program at the baccalaureate level in professional surveying	Approved by the Association of Ontario Land Surveyors
Lawyers	A bachelor of laws[2] or juris doctor degree	Accredited by the Law Society of Upper Canada
Management Accountants	A four-year university baccalaureate-level or graduate degree / prescribed course credit requirements	Accredited by Certified Management Accountants of Ontario
Paralegals	A legal services program	Accredited by the Law Society of Upper Canada
Social Service Workers	A diploma in social service work	At a college of applied arts and technology in Ontario
Social Workers	A degree in social work	Accredited by the Canadian Association for Social Work Education
Teachers	An acceptable post-secondary degree	A program of professional education accredited or approved by the Ontario College of Teachers
Veterinarians	A basic degree in veterinary medicine	Accredited by the American Veterinary Medical Association Council on Education
HEALTH		
Audiologists and Speech-Language Pathologists	A professional master's degree in audiology or speech-language pathology or both	Accredited by the Council for Accreditation of Canadian University Programs in Audiology and Speech-Language Pathology
Chiropodists	A post-secondary program whose curriculum includes courses in health sciences, chiropodial sciences, humanities and clinical education[2]	Approved by the College of Chiropodists of Ontario
Chiropractors	The requirements for graduation from a chiropractic education program	Accredited by the Canadian Federation of Chiropractic Regulatory and Educational Accrediting Boards

PROFESSION	ACADEMIC REQUIREMENT[1] An applicant must have completed...	ACCREDITATION OR APPROVAL The academic program must be...
Dental Hygienists	A program in dental hygiene equivalent to a full-time program of two years	Accredited by the Commission on Dental Accreditation of Canada
Dental Surgeons	A degree in dentistry as evidence of successful completion of a course in dental studies of at least four years duration at a university-based dental school	Accredited by the Commission on Dental Accreditation of Canada
Dental Technologists	An approved program in dental technology	At a college of applied arts and technology in Ontario
Denturists	A diploma in denture therapy or denturism	Approved by the College of Denturists of Ontario
Dietitians	A university program in foods and nutrition	Accredited by Dietitians of Canada
Massage Therapists	A diploma in massage therapy	At a private vocational school or college of applied arts and technology in Ontario
Medical Laboratory Technologists	An approved course of study in medical laboratory technology	Accredited by Canadian Medical Association — Conjoint Accreditation Services
Medical Radiation Technologists	A program in medical radiation technology	Approved by the College of Medical Radiation Technologists of Ontario
Midwives	A baccalaureate degree in health sciences (midwifery)	Obtained in Ontario
Nurses	Nurse Practitioner: Master's degree in nursing / Nurse practitioner program	Approved by the College of Nurses of Ontario
	Registered Nurse: A baccalaureate degree in nursing	Accredited by the Canadian Association of Schools of Nursing
	Registered Practical Nurse: A program in practical nursing	Approved by the College of Nurses of Ontario
Occupational Therapists	A bachelor of science degree or master of science degree in occupational therapy	Obtained in Ontario
Opticians	An opticianry program	Accredited by the National Association of Canadian Optician Regulators
Optometrists	An optometry degree	Accredited by the Accreditation Council on Optometric Education
Pharmacists	A minimum of a baccalaureate degree in pharmacy[2]	Accredited by the Canadian Council for Accreditation of Pharmacy Programs
Pharmacy Technicians	A pharmacy technician program	Accredited by the Canadian Council for Accreditation of Pharmacy Programs
Physicians and Surgeons	A degree in medicine	Accredited by the Committee on Accreditation of Canadian Medical Schools
Physiotherapists	A degree in physiotherapy / physical therapy	Approved by the College of Physiotherapists of Ontario
Psychologists	Psychologist: a doctoral degree from a program of study with content primarily psychological in nature Psychological Associate: a master's degree	Approved by the College of Psychologists of Ontario on the basis of meeting guidelines published by the college
Respiratory Therapists	A program in respiratory therapy	Accredited by the Council on Accreditation for Respiratory Therapy Education

Notes:

- [1] The wording in the Academic Requirement column has been drawn directly from the registration regulation or equivalent document for the profession.
- [2] Previous university study is required for admission to this program.

Colour Legend

Column 2		Column 3	
	College program is required		No profession-specific approval is needed
	Undergraduate degree is required		Must be approved by the regulatory body
	Graduate/professional degree is required		Must be accredited by an external accreditation body

6. Ontario professions: Registration regulations

This section discusses the registration regulations for Ontario's professions and the degree of flexibility the regulations allow for meeting academic requirements.

Legal constraints on the professions

Ontario's regulated professions operate within the constraints imposed by their statutes, regulations and bylaws. Professions can propose changes to any of these official documents, but the amendment process can be long and cumbersome. Changes to statutes and regulations must be approved by the Ontario government. Changes to bylaws must be approved by the profession's membership.

These approval processes help ensure that changes are carefully considered. However, they can also limit the regulators' flexibility in responding to new challenges, such as the increasing number of internationally educated applicants.

Academic requirements and registration regulations

Typically, professions describe their academic requirements in registration regulations.

Some consider that taking a flexible approach to academic requirements is incompatible with their registration regulations.

However, many professions have relied on flexible interpretations of terms like "equivalent academic qualifications" to introduce acceptable alternatives for assessing or developing professional competencies. Others prefer to go through the amendment process and embed new approaches within their registration regulations.

The regulations or other official documents typically state that an applicant must have:

- a) a degree from an accredited or approved program or
- b) academic qualifications that are "equivalent" or "substantially equivalent" to those named in clause (a).

Some professions' regulations include a third clause that:

- allows the applicant to demonstrate a combination of education, training and experience that is considered "equivalent" to the academic requirement or
- names an alternative assessment process for demonstrating equivalency

The variations in this third clause reflect a growing recognition among regulators that professional competencies can be developed in a variety of ways, and not only through formal academic study.

Alternative credentials

The bar for recognizing alternative academic credentials is high:

- 10 health and 8 non-health professions require an "equivalent" program or credential.[26]
- Only four professions use terminology such as "substantially equivalent," "substantially similar," or "not substantially different."[27]
- 2 professions require certification by a national body that assesses academic qualifications, specifies what the applicant must do to address any identified gaps, and verifies successful completion of these requirements.[28]
- The paralegal profession does not recognize any alternatives to an accredited program.[29]
- 5 health professions accept a program that their council or registration committee has approved or considers acceptable.[30]
- 4 health and 4 non-health professions define or list acceptable programs within their registration regulations.[31]

The wording of most registration regulations continues to emphasize credentials, rather than competencies. This can translate into a focus on program format and hours, rather than content and skills development. The regulations for pharmacists and pharmacy technicians are unique in specifying their acceptance of a program approved by their council as "one whose graduates should possess knowledge, skill and judgment at least equal to those of current graduates of an [accredited] program."[32]

Competencies developed outside a formal academic program

Despite the continued emphasis on academic programs and credentials, registration regulations frequently allow for acceptable alternatives for meeting academic requirements. These acceptable alternatives involve recognition of competencies developed through complementary training and/or work experience.

As noted earlier, some regulators take a flexible approach to interpreting clauses about "equivalent" or "substantially equivalent qualifications." Others embed clauses that describe the specific approach to recognizing competencies developed outside a formal academic program.

A full 20 professions use language that allows for a more holistic assessment of knowledge and skills:

- 4 health and 5 non-health professions recognize applicants who have a relevant credential and can also show additional education, training or experience that together meet the academic requirement.[33]
- 5 health professions refer to the use of competency assessments or exams.[34]
- 2 non-health professions name an alternative syllabus or certification program that can be used to develop and demonstrate competencies.[35]
- 2 health and 2 non-health professions use the flexible language of "alternative qualifications."[36]

Professions requiring graduate-level education are the least flexible about recognizing competencies developed outside of formal academic education.

Exemptions

An academic program is still the normal route to developing professional competencies. Registration regulations may allow applicants to demonstrate a combination of education and experience that is considered equivalent to the academic requirement, but they rarely allow for exemptions from the requirement to have completed an academic program.

Accounting bodies are more flexible than most professions, since they require both an undergraduate academic education and a program of professional training offered by the regulator. Applicants can complete required academic credits either during or after their undergraduate degree, and develop core competencies through their professional program. As a result:

- The Certified Management Accountants of Ontario and the Institute of Chartered Accountants of Ontario offer exemptions from academic requirements on the basis of relevant work experience.
- Allaccounting regulatory bodies may grant full or partial exemptions from education requirements for applicants who are members in good standing of an accounting body in another jurisdiction.

  [Correction: These points contain corrected information about exemptions in the accounting professions.]

Only two health regulators — for physiotherapy and respiratory therapy — offer exemptions. These exemptions are offered only in extremely limited circumstances, where the applicant was previously licensed or registered in either the same or a different province.

7. Ontario professions: Acceptable alternatives

This section discusses the fair-access implications of recognizing acceptable alternatives for meeting academic requirements. It examines five common types of acceptable alternatives and their availability in the 38 Ontario professions that are included in this study.

A flexible approach to academic requirements

The flexible wording of many registration regulations (see section 6) reflects a growing recognition by regulators that applicants can develop professional competencies in various ways, and not only through an academic program. Many professions have put this principle into practice, by recognizing a range of "acceptable alternatives" for meeting academic requirements.

Ontario's fair-access legislation encourages this flexible approach to academic requirements. FARPACTA states that regulated professions must provide information about "objective requirements for registration by the regulated profession together with a statement of which requirements may be satisfied through alternatives that are acceptable to the regulated profession."[37]

Regulators interpret this clause in a variety of ways. For example, in their Fair Registration Practices Reports, some regulators describe alternative pathways for meeting academic requirements, while others define the requirement itself as including several options, and therefore list no alternatives.

For the purpose of this study, acceptable alternatives include:

- alternative ways that an applicant can acquire professional competencies, above and beyond a traditional program of academic study. These alternatives include:
  - additional training or experience that an applicant acquires before applying for licensing
  - extra courses or bridging programs taken to fill gaps in an applicant's knowledge/skill that are identified through the regulator's process for assessing credentials
- alternative ways that professional competencies are demonstrated or assessed (usually through competency assessments, such as paper-based portfolio processes and written and practical exams)

Acceptable alternatives go significantly beyond the acceptance of alternative documentation of academic credentials. All but two[38] of the professions included in this study recognize some kind of acceptable alternative for meeting academic requirements.

As stated in section 6, twenty professions take a holistic approach to assessing academic qualifications, and consider competencies developed outside of formal education. Others complete a more traditional credential assessment, but offer applicants various ways to address identified gaps in their competencies.

Contributions and challenges of acceptable alternatives

Acceptable alternatives contribute to fair access by introducing flexibility into the licensing process:

- Where academic documents are unavailable or are insufficient to demonstrate an applicant's competency, acceptable alternatives allow for alternative forms of assessment.
- Where gaps exist, acceptable alternatives enable applicants to meet competencies without repeating a full program of academic training.

However, acceptable alternatives can also present challenges to fair access. Applicants may not have the time or the financial resources to take advantage of acceptable alternatives for meeting academic requirements.

Regulators, for their part, struggle with issues of sustainability. In many cases, alternative assessments and training programs designed to fill gaps are delivered by external qualifications-assessment agencies and education providers, and are highly dependent on time-limited funding from the federal or provincial government.

In this study, the Office of the Fairness Commissioner (OFC) does not prescribe a preferred approach to acceptable alternatives. Rather, the aim is to describe current practices, and to highlight relevant fairness issues.

Five types of acceptable alternatives

In this study, acceptable alternatives have been classified into five broad types or categories:

- paper-based assessment of education and experience
- direct assessment of knowledge and skills
- self-paced learning
- bridging programs
- advanced standing

Table 2 identifies the professions offering these types of acceptable alternatives, and presents highlights about:

- delivery methods (whether the alternative is delivered by the profession's regulatory body or by another organization)
- cost for the applicant
- time requirements
- processes for appealing the result

Table 2. Acceptable alternatives in Ontario's regulated professions: Availability, delivery mechanisms, and fairness considerations

Acceptable Alternative	Professions where this alternative is available	Delivery	Cost to applicant	Time implications	Access to appeal of the result
Paper-based assessment of education and experience	Total: 10 professions Non-health: 9 Chartered Accountants, Engineering Technicians and Technologists, Engineers, Foresters, Geoscientists, Land Surveyors, Management Accountants, Social Service Workers, Social Workers Health: 1 Medical Laboratory Technologists	7 professions' regulatory bodies directly deliver paper-based assessments: Chartered Accountants, Engineers, Geoscientists, Land Surveyors, Management Accountants, Social Service Workers, Social Workers 3 professions use tools developed nationally: Engineering Technicians and Technologists, Foresters, Medical Laboratory Technologists	Low end: Included in licensing application fee High end: $678	Variable Several professions inform applicants that the assessment process is complex and lengthy. Most structured example: Assessments take place twice yearly with results available after 6–8 weeks.	Appeal of registration decision is available in all cases. No fee. Structured portfolio assessment process offers options for full and partial reassessment. Involves a fee.
Direct assessment of knowledge and/or skills	Total: 16 Professions Non-health: 6 Engineering Technicians and Technologists, Engineers, Foresters, Geoscientists, Lawyers,	9 professions' regulatory bodies directly deliver an assessment or exam: Audiologists & Speech-Language Pathologists, Dental Hygienists, Dental	Low end: $75 per written exam High end: $7,200 for a clinical exam	Variable Low end: Exams offered 4 times per year.	Recourse is typically specific to the exam or assessment process and may involve a fee. Options include:

Acceptable Alternative	Professions where this alternative is available	Delivery	Cost to applicant	Time implications	Access to appeal of the result
	Veterinarians Health: 10 Audiologists & Speech-Language Pathologists, Dental Hygienists, Dental Surgeons, Dental Technologists, Massage Therapists, Nurses, Opticians, Pharmacists, Pharmacy Technicians, Physicians	Technologists, Engineering Technicians and Technologists, Engineers, Foresters, Geoscientists, Massage Therapists, Opticians. 6 professions accept assessments or exams delivered by a national body: Dental Surgeons, Lawyers, Pharmacists, Pharmacy Technicians, Physicians, Veterinarians The nursing profession offers an Objective Structured Clinical Examination delivered through a provincial third party: the Centre for the Evaluation of Health Professionals Educated Abroad.		High end: Exams offered once yearly. One exam has a waiting period of 24 months.	• Appeal the result. • Retake the exam. • Retake a portion of the exam.
Self-paced learning to fill academic gaps	Total: 20 professions Non-health: 14 Architects, Chartered Accountants, Early Childhood Educators, Engineering Technicians and Technologists, Engineers, Foresters, General Accountants, Geoscientists, Land Surveyors, Lawyers, Management Accountants, Social Service Workers, Social Workers, Teachers Health: 6 Audiologists & Speech-Language Pathologists, Dietitians, Massage Therapists, Medical Laboratory Technologists, Nurses, Opticians	13 professions direct applicants to take courses at a post-secondary institution: Architects, Chartered Accountants, Early Childhood Educators, Engineering Technicians and Technologists, Engineers, General Accountants, Geoscientists, Lawyers, Management Accountants, Nurses, Social Service Workers, Social Workers, Teachers. Accounting courses may be taken at a university or through a regulatory body	Variable Depends on discipline, institution and the number of courses required. Courses offered by a regulator or national professional organization are generally cheaper. Association of Ontario Land Surveyors: $282/course RAIC: $525/course	Variable Depends on learning needs and number of courses required.	Post-secondary institutions typically allow for an appeal of course grades. RAIC course marks can be appealed.

Acceptable Alternative	Professions where this alternative is available	Delivery	Cost to applicant	Time implications	Access to appeal of the result
		For 7 professions, an individualized plan for filling gaps is negotiated by the applicant and regulator: Audiologists & Speech-Language Pathologists, Dietitians, Foresters, Land Surveyors, Massage Therapists, Medical Laboratory Technologists, Opticians. The Association of Ontario Land Surveyors offers its own bridging courses. Architecture Canada offers the Royal Architectural Institute of Canada (RAIC) curriculum, an alternative to university-based courses.			
Bridging programs to support applicants in meeting academic requirements[1]	Total: 13 Professions Non-health: 3 Engineers, Lawyers, Veterinarians Health: 10 Dietitians, Medical Laboratory Technologists, Medical Radiation Technologists, Midwives, Nurses, Occupational Therapists, Optometrists, Pharmacists, Pharmacy Technicians, Physiotherapists	For all 13 professions, bridging programs are offered by a post-secondary educational institution.	Low end: Under $5,000, and all direct costs can be covered by the Ontario Bridging Participant Assistance Program High end: $40,000	Low end: 3–4 months (college) High end: 9–12 months (university)	Post-secondary institutions typically allow for an appeal of course grades.
Advanced standing	Total: 5 Professions[2] Non-health: 2 Paralegals, Teachers Health: 3	All 5 professions direct applicants to advanced standing or transfer credit options at post-secondary educational institutions.	Low end: Under $4,500 High end: $150,000	Low end: Under 1 year High end: 2 years	Post-secondary institutions typically allow for an appeal of course grades.

Acceptable Alternative	Professions where this alternative is available	Delivery	Cost to applicant	Time implications	Access to appeal of the result
	Chiropractors, Dental Surgeons, Massage Therapists				

Notes:

- [1] The following professions formally recognize a bridging program as meeting academic requirements for licensing: Dietitians, Engineers, Midwives, Nurses, Optometrists, Pharmacists, Pharmacy Technicians. For the other six professions, bridging programs help applicants build understanding of the Ontario professional environment and prepare to write required exams.
- [2] It is possible that individuals from other professional backgrounds have also pursued such opportunities directly with educational institutions.

It is important to note that many professions recognize more than one category of alternative. In such cases, alternatives are sometimes used in combination. For example, two or more assessments may be used together to generate a more complete picture of an applicant's knowledge and skills. Or an assessment may uncover gaps that the applicant can address through self-paced or structured learning.

Sometimes, applicants may have a choice of alternatives, particularly when it comes to filling gaps. For example, they might be able to choose between taking a course and writing an exam. Or they might have the option of self-study or a bridging program to prepare for required exams.

Paper-based assessment of education and experience

Description

Paper-based assessments require an applicant to describe learning or work experience that demonstrates competencies required for the profession. This may be as simple as submitting academic credentials and a resumé or work-experience record that are assessed together in a holistic way. In other cases, it may involve putting together a portfolio submission that provides a more detailed description of how each competency has been met. In a portfolio submission, the applicant must typically provide expert witnesses and/or documentary evidence to support each of the competencies that the applicant claims to have. In this way, regulators receive a high level of assurance and applicants have the opportunity to submit evidence they believe to be useful.

Professions

Ten Ontario professions use a paper-based assessment of education and experience to determine whether applicants have met the academic requirement for licensing (see Table 2).

Seven of the 10 professions' regulatory bodies administer their own assessment process. The remaining three use nationally developed tools and processes.

Non-health professions use paper-based assessment more often than health professions. Health professions tend to rely more heavily on exams and clinical assessments.

Challenges

Challenges related to this type of alternative include the following:

- It requires documentation that may be difficult and time-consuming for some applicants to prepare or obtain from overseas.
- Some applicants' level of language fluency may affect their ability to adequately describe and substantiate competencies.
- Work samples may be difficult to get or may be subject to confidentiality agreements.
- Professors and/or work supervisors who could attest to an applicant's knowledge and skills may have moved or died.

Portfolio submissions are particularly challenging to prepare. Regulators report that many applicants are reluctant to present a portfolio submission. These applicants tend to prefer more familiar options, such as taking a course or writing an exam, to demonstrate competencies that were not covered by their academic training. Other regulatory bodies report difficulty getting the level of detail they need to make a confident assessment.

Providing clear and comprehensive instructions to applicants can help them understand what documents to provide and how to provide them. Several professions warn applicants that the assessment process is long and complex.

Cost

The cost of paper-based assessments tends to be lower than the cost of other kinds of acceptable alternatives for meeting academic requirements. Many professions include this service in the application fee payable to the regulatory body.

One profession, which uses a national assessment process, charges a fee of $678 (the highest fee for this service among the professions studied).

At least one other has considered introducing a fee, to cover the costs of individualized support for preparing submissions.

Direct assessment of knowledge and/or skills

Description

Direct assessment requires an applicant to pass one or more tests, of a written or practical nature. Depending on the profession, the test may be called an "assessment" or — more frequently — an "examination." Non-health professions tend to use written exams. Some professions, particularly health and veterinary professions, require a combination of written and clinical exams. Clinical exams may involve working on a human patient or live animal, or they may involve interacting with a trained actor.

Direct assessments allow regulators to evaluate the current knowledge and/or skills of applicants, for two main purposes:

- to confirm the results of a credential assessment. Applicants write an exam to confirm whether their education is adequate or they need more training. This type of exam is often called an evaluating exam. It is a prerequisite for writing the licensing exam.
- to fill gaps identified by a credential assessment. Applicants are assigned exams in specific subject areas in order to fill gaps in education. Typically, regulators suggest study materials to help the applicant prepare for the exam. This approach is used by non-health professions such as engineering and law, where applicants frequently have a choice between taking a course and writing an exam. It is not used by health professions.

Professions

Sixteen Ontario professions use or accept some form of direct assessment as an acceptable alternative for meeting academic requirements (see Table 2).

Delivery

Nine professions' regulatory bodies deliver the direct assessment or exam themselves, while six professions rely on exams offered by a national body. Nursing uses a provincial third party, the Centre for the Evaluation of Health Professionals Educated Abroad, to administer its new objective structured clinical exam.

Challenges

- Exams add significant stress to the licensing process, and may require applicants to spend a significant amount of time studying and preparing.
- Applicants may not be familiar with the testing format.
- Many of the exams ask applicants to demonstrate knowledge of subject matter that they covered in their academic studies, but that they have used rarely or not at all during many years of professional practice. Such exams tend to test an applicant's comparability to a recent graduate rather than to an experienced member of the profession.

Regulators are keenly conscious of their public-protection mandate. They continue to struggle with developing assessments that are appropriate to mid-career professionals and that provide adequate assurance of competency. For example:

- Some professions have considered alternatives such as practice assessments to address the challenges inherent in exams.
- Others use interviews to assess whether applicants' work experience fills gaps in academic training.

Such approaches can offer insight into practice competencies, but they require:

- careful development of assessment criteria and common rating tools
- rigorous training of assessors to minimize the risk of subjectivity

Where exams are used, they should be thoughtfully designed to focus on knowledge and skills that are directly relevant and necessary to safe and competent professional practice.

Regulators can also use a variety of strategies to help applicants be successful:

- Comprehensive exam-preparation materials can help applicants to understand expectations and prepare successfully.
- Exam-preparation seminars can offer more structured support for helping applicants prepare for exams.

Bridging programs can also help applicants prepare for exams that are required of all internationally educated applicants, or can provide a more structured alternative to self-study for exams that are individually assigned to address specific gaps in education.

Cost

The cost of exams can be high, and sometimes prohibitively so.

Written exams offered by the regulatory body itself tend to be the least expensive, starting at $75 for an exam in a specific subject area.

Clinical exams are the most expensive, with costs reaching as high as $7,200. This is particularly problematic when success rates are low, and many applicants have to repeat all or part of an exam.

Self-paced learning

Description

Self-paced learning pathways allow applicants to address specific gaps in academic training without repeating training that they already have. Typically, these gaps are:

- identified through the assessment of an applicant's academic credentials
- defined in terms of the courses or competencies that the applicant is missing

Rather than undertaking a full program of study, applicants typically enrol in individual courses to address gaps at their own pace. Some professions allow for individualized learning plans. This approach increases flexibility through openness to non-traditional and workplace learning.

Professions

Twenty professions recognize some form of self-paced learning to fill gaps in academic training (see Table 2).

Delivery

Of the 20 professions that use self-paced learning:

- 13 direct applicants who have gaps to take courses through academic programs.
- 7 negotiate an individualized plan with the applicant, which may include course work and other forms of learning.

The Association of Ontario Land Surveyors offers its own courses in high-priority topics such as survey law. These topics address Ontario-specific gaps that are common to most internationally educated applicants.

Architecture Canada, a national body, offers self-paced learning opportunities through the Royal Architectural Institute of Canada (RAIC) Syllabus Program.

Challenges

Unless the regulator has specifically arranged access for applicants, they may have difficulty registering for individual courses.[39]

In some cases, the applicant may only really need specific sections of one or more courses. However, the only way to access that content is to take the entire course. This means that the applicant may still need to repeat training that he or she already has. It can also extend the time involved in meeting academic requirements for licensing, especially if the required courses are not offered every semester.

Regulators can and should consider negotiating access to courses on behalf of applicants. The College of Respiratory Therapists of Ontario successfully negotiated with providers of academic programs to reserve spaces for applicants who were referred to the college's "supported integration" pathway.[40]

Professions may also improve access by working provincially or nationally to develop targeted training to address gaps that are common to many non-traditional applicants. The professions can then offer this training in a way that allows for self-paced learning.

Cost

The cost of self-paced learning varies among providers. Targeted courses offered directly by a regulator or national professional organization can be cheaper for applicants than a semester-long course at a post-secondary educational institution. However, such courses can be expensive to develop and maintain, especially for small professions that do not have strong national organizations.

Bridging programs

Description

Bridging programs, like self-paced learning pathways, help internationally educated people to fill specific gaps in knowledge and skills. However, bridging programs offer a complete package of courses and other learning opportunities specially designed to meet the needs of internationally educated professionals. In this regard, they are distinct from both self-paced learning and advanced-standing opportunities in regular programs of professional education.

Participant feedback affirms the value of Ontario's bridging programs in helping applicants prepare for exams.[41] While evaluation research is limited, some programs have documented improved success rates for bridging participants.[42]

Bridging programs provide a supportive community to participants during the often stressful journey to becoming licensed and employed in their profession. The most successful bridging programs also include a mentoring or internship component that helps participants develop a professional network.

This analysis focuses on bridging programs that help participants become licensed in their field of expertise in a new jurisdiction. It excludes bridging programs that are solely focused on employment.

Professions

For 13 professions, applicants can enrol in a bridging program that helps them meet academic and/or exam requirements for licensing (see Table 2).

Formal recognition of bridging programs varies:

- In 7 professions, applicants can meet academic requirements for licensing by successfully completing a bridging program that is recognized by the regulatory body.[43] (For Dietitians, the bridging program allows most participants to meet the academic requirements, but some applicants may have to take extra courses outside of the bridging curriculum.)

- For the 6 other professions, the bridging program helps applicants understand the Ontario work environment and prepare for required exams.[44] The exams may themselves constitute an acceptable alternative for meeting academic requirements, or they may be licensing exams required of all applicants.

Delivery and funding

Bridge training is funded by the provincial government and delivered by a variety of third-party providers. All of the bridging programs considered in this study are delivered by a post-secondary educational institution.

The province may identify priority professions based on analysis of service gaps in Ontario and the numbers of new immigrants with a particular professional background, but the provision of bridging programs has relied heavily on sectoral champions. These champions pioneer projects and develop partnerships. This has resulted in significant variation in the availability and the quality of bridging programs among professions.

The most successful bridging programs are those where there is a strong collaborative relationship between the provider and the regulator. The regulator must be confident in the quality of the training in order to affirm that a bridging program meets academic requirements for licensing. For maximum benefit, the regulator must also be open to feedback from bridging providers about licensing requirements or processes that create unnecessary barriers for internationally educated applicants.

Challenges: Limited space and competitive application processes

Access to bridging programs can be a challenge, especially for immigrants who live in smaller centres where there are few such specialized services. Even in large cities such as Toronto, access can be difficult for applicants to highly competitive bridging programs where the number of available spots is lower than the demand.

Access is of particular concern in the case of those bridging programs that are a mandatory component of the licensing process for internationally educated professionals:

- Program caps can force eligible applicants onto waiting lists, imposing a delay of a year or more in the licensing process.
- Programs that have adopted a competitive application process may exclude applicants who meet minimum eligibility requirements but do not rank well against their peers.

Challenges: Program and living costs

Costs can also limit access to bridging programs. University-based bridging programs in nursing, optometry, pharmacy and veterinary medicine all cost over $10,000. Most bridging participants cannot access the Ontario Student Assistance Program (OSAP).

The Ontario Bridging Participant Assistance Program provides aid for the direct costs of bridging programs delivered by publically funded post-secondary institutions, but this aid does not even begin to address living costs. Most programs recognized as meeting academic requirements for licensing are nine months to one year long. It can be difficult to forgo an income and make ends meet for that period of time, especially for applicants with family obligations.

Overcoming challenges

Given the access challenges discussed above, the OFC has discouraged regulators from making these programs mandatory for internationally educated applicants. Some bridging programs are exploring flexible options such as:

- providing online and distance learning options
- integrating bridging participants into certain courses within regular professional programs, to help make the programs sustainable and ease student access to OSAP
- developing modular approaches where participants take specific courses to fill specific knowledge gaps rather than a one-size-fits-all program

Each of these approaches introduces new challenges. For example, with uncertain funding, many providers are concerned about programs' sustainability, especially for professions where numbers are small:

- The massage therapy bridging program has not run since 2011. This leaves applicants educated outside Ontario with no option but to apply for advanced standing in an approved program in Ontario. [Correction: This

paragraph contains corrected information about the massage therapy program.]
- The College of Respiratory Therapists of Ontario recently suspended its alternative pathways to licensing. The "bridging pathway" did not have enough eligible applicants, and the "supported integration" pathway did not have enough spaces to meet demand. The college is currently reviewing the pathways model in an effort to ensure successful and sustainable alternatives.

The OFC continues to urge the provincial government to maintain funding for bridge training and to improve financial aid for participants.

Advanced standing

Description

In some cases, the gap between an applicant's education and the regulator's requirement may be too great to close by way of self-paced learning or a bridging program. And in certain professions, self-paced learning or a bridging program may not be available or appropriate. For example, paralegals *must* graduate from an accredited Ontario program to qualify for licensing.

In these situations, applicants may have to enrol in a regular academic program that is accredited or approved by the Ontario regulator.

However, they may be able to apply for partial recognition of their past education. The educational institution may grant recognition for specific courses or transfer credits, or it may grant *advanced standing* and allow applicants to enter the program in mid-stream.

Advanced standing allows a person to fill gaps in academic training without having to repeat a full program. Because participants complete the final stages of training within an accredited program, there is a high level of assurance for regulators.

Professions

Advanced standing is an option for at least five Ontario professions: chiropractors, dental surgeons, massage therapists, paralegals and teachers.[45] Regulatory bodies for these professions are aware of advanced-standing opportunities and can direct applicants to relevant information. Generally, access to advanced standing is determined by the educational program and may be formalized to a greater or lesser degree. For example:

- For dentistry, the process is highly formalized and universities reserve advanced placement spots for internationally educated dentists.
- For the paralegal profession, individual applicants with prior legal training must take the initiative to apply for transfer credits.

Challenges

Like bridging programs, advanced-standing pathways present challenges related to access and affordability:

- There are often limited spaces available to internationally educated applicants.
- The process can be long and costly. Dental surgeons choosing this route must study for two years, at a cost of up to $150,000. To provide a quicker and less costly alternative, the profession has introduced an alternative option involving three assessments administered by the National Dental Examining Board.

Regulatory bodies can advocate for formal advanced-standing spots for internationally educated candidates. As in the case of dentistry, they can also introduce more alternatives to alleviate access concerns.

Appeal processes

Appeal processes are generally available for each category of acceptable alternative (see Table 2).

In the case of assessments and exams, applicants usually have recourse to a formal appeal of the exam result, retaking the exam, or retaking a portion of the exam.

8. Acceptable alternatives and increased access to professions

The positive impact of flexibility

Increasing the flexibility of the licensing process does have an impact. Among regulated professions, there is a significant correlation between the accessibility of acceptable alternatives and reduced disadvantage for internationally educated professionals.

This section explores that correlation, and the costs of inflexibility.

Employment disparity

To date, the most significant statistical study of profession-specific differences in employment "match rates" for immigrants and Canadian-educated people is Zietsma's 2010 analysis of 2006 census data.[46] The analysis looked at how well people's field of study matched their occupation in Canada, for 15 fields of study that usually lead to a regulated occupation.

In Canada, overall:

- 24% of internationally educated immigrants were working in the regulated profession they were trained for.
- 62% of the people born and educated in Canada were working in the regulated profession they were trained for.

Match rates for immigrants were above the national average in Saskatchewan and Alberta, which had strong labour markets in 2006. Ontario figures mirrored national averages.

Variation among professions was considerable. For example:

- Match rates for internationally educated immigrants ranged from 12% for lawyers to 84% for chiropractors.
- People educated in regulated health professions had consistently higher match rates than people trained in non-health professions.
- Non-health professionals were more likely to be working in a related but non-regulated occupation.

Flexible licensing and reduced employment disparity

Correlation

There is a correlation between more flexible licensing approaches that offer acceptable alternatives for meeting academic requirements and reduced disparity in employment outcomes between internationally educated professionals and their Canadian-born counterparts.

The smallest gaps in match rates between Canadian-educated and internationally educated people were for engineers, nurses, occupational therapists, and chiropractors (see Table 3):

- 19% of internationally educated engineers were employed in their profession, compared to 42% of their Canadian-born counterparts. The gap between these match rates is 23 percentage points.
- Internationally educated nurses and occupational therapists had match rates 17 percentage points lower than their Canadian-born counterparts.
- Internationally educated chiropractors were employed in their profession at rates similar to their Canadian-born counterparts (84% versus 87%, for a gap of only 3 percentage points).

These gaps are much lower than the average: For the total study population of all 15 regulated professions combined, the comparable figure was 38 percentage points.

Table 3. Canadian professions with the least disparity in employment match rates, 2006

Profession	Canadian-born-and-educated		Internationally educated		Gap (in percentage points)
	Total	Employed in profession of training	Total	Employed in profession of training	
Engineers	167,260	42%	157,930	19%	**23**
Nurses	78,880	73%	13,150	56%	**17**
Occupational therapists	9,345	82%	560	65%	**17**
Chiropractors	5,745	87%	345	84%	**3**
Total study population	937,050	62%	284,080	24%	**38**

Data Source: Statistics Canada, Census of Population, 2006 — As analyzed by D. Zietsma, 2010.[47]

Engineers and nurses

The engineering and nursing professions, with large numbers of internationally educated applicants, were among the early innovators in alternative assessment and bridge training. A 2007 national inventory of bridging programs lists 15 bridging programs for internationally educated engineers and 11 for internationally educated nurses — more than for any other profession.[48]

Ontario has led and sustained innovation in both these professions. In Ontario today, both nursing and engineering offer four categories of acceptable alternatives:

- paper-based assessment
- direct assessment (exams)
- self-paced learning
- bridging programs

Occupational therapists

Occupational therapy, while a smaller profession, has also been an innovator:

- As early as 2000, well before the 2006 census, a McMaster University professor was offering to help internationally educated occupational therapists practise for exams.
- In 2005, the Canadian Association of Occupational Therapists undertook a research project that led to the development of a national bridging curriculum.[49]

In Ontario today, the Occupational Therapy Examination and Practice Preparation Project (OTepp) is among the most condensed and inexpensive of all bridging programs for the regulated professions. OTepp offers both a complete program and a modular option for applicants who need only selected courses. The full program of five courses has a modest cost of $1,000 and lasts seven months.

Chiropractors

Chiropractors, with the lowest gap in match rates, are a unique case, as the profession has a very small base outside North America, Europe and Australasia. In those regions, the Councils on Chiropractic Education International has worked to establish agreement on international educational standards and ensure their adoption by accredited chiropractic colleges.

The value of flexibility

As this analysis suggests, employment disparities are comparatively low for professions that recognize a variety of acceptable alternatives, and where these alternatives are relatively accessible in terms of cost and time. Disparity is also low where foreign-credential-recognition is high.

The costs of inflexibility

In contrast, disparities are greater for professions where acceptable alternatives have historically been more limited and more expensive. In Zietsma's study, the gap between employment match rates for internationally educated and Canadian-born professionals rises above 50 percentage points for veterinary medicine, optometry and law (see Table 4).

Table 4. Canadian professions with the greatest disparity in employment match rates, 2006

Profession	Canadian-born-and-educated		Internationally educated		Gap (in percentage points)
	Total	Employed in profession of training	Total	Employed in profession of training	
Veterinary medicine	6,580	83%	2,225	29%	**54**
Optometry	2,760	95%	340	38%	**57**
Law	82,615	69%	11,295	12%	**57**
Total study population	937,050	62%	284,080	24%	**38**

Data Source: Statistics Canada, Census of Population, 2006 — As analyzed by D. Zietsma, 2010.[50]

In Canada, various causes have contributed to these higher gaps:

- Veterinary medicine has been characterized by the high cost of the exams that internationally educated applicants must take.
- In optometry, a numerical cap limits the number of applicants who may take the mandatory bridging program. This in turn limits access to the profession.
- The legal profession has required internationally educated applicants to do lengthy retraining or self-study. In recent years, the National Committee on Accreditation (NCA) has reduced its requirements, but all internationally educated applicants must still take courses and/or write exams in at least four Canadian subject areas. Law school courses can be difficult to access for individuals not enrolled in a law program. In Ontario, the University of Toronto's bridging program for internationally educated lawyers provides a structured alternative to self-study, but does not replace NCA exams. The bridging program and exams are relatively affordable, but the time investment is significant.

Correlation and causality

It is always difficult to prove causal relationships within complex social processes, where many factors influence outcomes. Immigrant employment outcomes are significantly influenced not only by access to licensing but also by employer preferences and the strength of the labour market.

Nevertheless, this analysis shows a significant positive correlation between recognition of acceptable alternatives for meeting academic requirements and stronger licensing/employment outcomes for internationally educated applicants. It may be that professions that have invested in acceptable alternatives have also developed stronger systems for recognizing international credentials.

In its 2011–12 assessments of regulated professions' licensing practices, the Office of the Fairness Commissioner made 16 recommendations related to acceptable alternatives, encouraging regulators to move towards more flexible pathways to licensing.

9. Conclusions

Challenges

Internationally educated applicants face a number of challenges when trying to meet academic requirements for licensing in Ontario.

In some cases, these challenges may relate to the fact that applicants require more education to become licensed in Ontario than they did in their country of training. In others, the greater challenge lies in demonstrating the required "equivalency" or "substantial equivalency" in academic background.

Ensuring requirements are necessary and relevant

Ontario's fair-access legislation has established the principle that all requirements for licensing must be relevant and necessary to the practice of the profession. And Canadian labour-mobility legislation has obliged professions to work towards a national consensus on requirements, contributing to healthy national debate about the relevance and necessity of requirements that have historically varied across provinces and territories.

Such debate and exploration are also needed at the international level. For example:

- Negotiating mutual recognition agreements can encourage thoughtful consideration of the relevance and necessity of registration requirements, by placing them in an international perspective.
- Professions may also benefit from involving international experts in a third-party review of the relevance and necessity of requirements. The value of such reviews has already been shown through experiences in evaluating academic programs.

Accommodating differences through alternatives and competency assessment

Globally, full harmonization of standards remains a distant goal. Considerable variation exists among jurisdictions both in the resourcing of educational systems and the technological contexts of professional practice.

As a result, Canada will continue to receive skilled immigrants who need bridging support in order to practise safely and effectively in a new professional environment.

At the same time, differences in knowledge and skills must be assessed — not assumed. Competency-based assessment has an important role to play in distinguishing between those applicants who already have the required knowledge and skill — however developed — and those with competency gaps. A focus on competency also supports the design of learning opportunities that allow applicants to bridge gaps in the most streamlined way possible.

Fair-access legislation has established the principle that competencies are more important than credentials, and that applicants should be made aware of any "acceptable alternatives" for meeting licensing requirements. The evidence suggests that acceptable alternatives can make the licensing process more flexible and contribute to improved employment outcomes for internationally educated professionals. However, care must be taken to ensure that such alternatives remain accessible, timely and effective in helping applicants to become licensed.

Ensuring sustainability and accessibility of acceptable alternatives

Post-secondary institutions are heavily involved in the delivery of self-paced learning, bridging programs, and advanced-standing programs.

To ensure the sustainability of these options and improve their accessibility:

- Post-secondary institutions must better integrate the options into the institutions' regular activity.
- The Ministry of Training, Colleges and Universities must provide financial and institutional support.

These changes would foster more consistent coverage and quality across the full range of regulated professions. To date, the development of opportunities to close educational gaps has been led by people in a variety of organizational contexts who were passionate about integrating internationally educated individuals within a specific profession. A more systematic approach would help to ensure that high-quality opportunities are available in all professions.

Further, post-secondary institutions also need to make academic programs more flexible:

- Access to individual courses must be improved. Programs could open direct access to individual courses. Or, they could offer access to individual courses through a bridging program that blends courses tailored to the particular needs of internationally educated participants with opportunities to interact with Canadian students.
- Advanced-standing spaces must be planned for and reserved.

Resourcing foreign-qualification-recognition

Yet bridging and other alternatives are not a cure-all. They must not be used to compensate for gaps in the ability of assessors to recognize the real competencies of applicants.

Continued investment is needed in initiatives that help regulators and national bodies ensure that foreign qualifications can be recognized in an efficient and timely way. Such initiatives could focus on credential assessment, competency assessment, or both.

Only these investments and initiatives can minimize the deterioration of professional competency caused by prolonged periods away from practice — a deterioration that all too often makes a temporary career interruption into a permanent one.

Providing federal and provincial funding

Both federal and provincial governments have an important role to play in providing resources for foreign-qualification-recognition and for bridging programs. Significant financial investments have already been made, but observers have questioned whether momentum can be maintained, given the project-based approach to funding.[51]

Federally, the Foreign Credential Recognition Program (FCRP) is the main source of funding for assessment tools and processes. The federal government's latest progress report on foreign-credential-recognition states that the FCRP funded initiatives worth $120 million up to the end of 2011.[52] Funding tends to cover the cost of developing a new approach to assessment, but not the ongoing expenses for delivering that new approach.

Provincially, the Ministry of Citizenship and Immigration has tended to take the lead role in funding bridge training. From 2003 to 2011, the Ontario government invested $240 million in bridging projects. In 2012, Ontario bridging investment was projected at $57 million, co-funded by the provincial and federal governments.[53]

However, Ontario's Premier has stated concern about the sustainability of bridging programs, in light of proposed changes to federal funding for skills training. Federal funding to the province under the current labour-market agreement may fall significantly in April 2014, with the implementation of the Canada Job Grant, a new grant program to be funded equally by Ottawa, the provinces and the private sector.[54]

Project-based funding often results in a downloading of costs to applicants, for assessments, exams and bridging programs. The benefits of acceptable alternatives cannot be achieved if the alternatives are too expensive. Internationally educated applicants often face significant financial barriers, and have limited access to financial aid. Regulatory stakeholders and education providers can and should make affordability an important consideration in the design of acceptable alternatives, but government also needs to play a role in enhancing access to financial aid.

Investing in the public interest

Canada cannot afford *not* to invest in finding solutions to the undervaluing of immigrant education. A 2011 Royal Bank of Canada report estimates a total loss of $30.7 billion in potential immigrant earnings, equivalent to 2.1% of GDP in 2006.[55]

Behind these numbers lies an uncounted human cost: men and women frustrated by shattered dreams, children growing up in poverty, communities searching for professional services informed by their own language and cultural experience.

Both government and regulatory stakeholders have a responsibility to act in the public interest, to find acceptable alternatives to this waste of human resources. They must continue to collaborate to improve and sustain assessment processes and learning opportunities that allow internationally educated individuals to make their full contributions — to their profession and to the public.

10. Acceptable alternatives: The way forward

The Office of the Fairness Commissioner makes the following recommendations to regulatory bodies, educational institutions, and government. The recommendations will help all stakeholders to:

- address existing challenges related to acceptable alternatives
- enhance flexible opportunities for applicants to meet academic requirements for licensing in Ontario

Recommendations to regulatory bodies

- Focus on competencies, not credentials.
- Make assessment more flexible, to recognize the variety of ways that individuals develop professional knowledge and skills. As appropriate, work with national bodies to design and implement alternative approaches to the assessment of professional competencies.
- Collaborate with educational institutions to offer high-quality learning opportunities that enable internationally educated applicants to develop missing competencies and fulfil requirements for licensing. Advocate for improved access to individual courses, bridging programs and advanced-standing opportunities.
- Work with partners to minimize the time and cost associated with acceptable alternatives.

Recommendations to post-secondary educational institutions

- Focus on teaching competencies, not on maintaining traditional program structures.
- Strengthen prior learning assessment and introduce flexibility into educational offerings to better meet diverse learning needs. Improve access to individual courses and advanced standing.
- Integrate bridging and bridging-like programs into the regular business of academic departments, so that this work is no longer isolated and dependent on time-limited project funding.

Recommendations to government

- Maintain and enhance funding for foreign-credential-recognition initiatives and bridge training.
- Improve access to financial aid for internationally educated professionals, to cover the whole range of costs associated with the licensing process, from assessments and exams to bridge training.
- Ensure that all relevant departments actively support the successful licensing and employment of immigrant professionals, rather than relying only on departments of citizenship and immigration.
- Through the Ontario Ministry of Training, Colleges and Universities, ensure that the post-secondary education system meets the needs of internationally educated learners.

Glossary of terms

Academic requirement

The formal post-secondary education, or equivalent, that is required for licensing in a particular regulated profession. In this study, academic requirements are separate from a profession's *professional program* requirements. Professional programs may be offered within or beyond the university environment and typically involve intensive practical training or work experience (for example, accounting professional programs, medical residency).

Acceptable alternatives

Alternative ways to meet licensing requirements, including alternative ways to acquire the skills and knowledge needed to practise the profession, and alternative ways in which these professional competencies can be demonstrated or assessed. In this study, the focus is on acceptable alternatives for meeting **academic** requirements.

Advanced-standing opportunities

Opportunities to enter an education program mid-stream based on recognition of studies completed at another educational institution.

Bridging program

A program designed to help internationally educated people close ("bridge") specific gaps in knowledge and skills in order to become licensed or employed in their field of expertise in a new jurisdiction. This study focuses specifically on bridging programs that help participants meet academic or examination requirements for licensing.

Certification

The process by which an organization with the appropriate authority confirms that an individual has met academic or other requirements to become licensed in a particular profession. In some professions, *certification* also refers to the process of authorizing an individual to use a professional designation or protected title.

Competencies

The skills and knowledge needed to practise an occupation.

Competency-based assessment

A process or tool used to measure a person's knowledge and skills obtained through formal or non-formal education, work experience, or other means, in order to determine whether the person meets requirements or needs further training.

Fair-access legislation

In Ontario, the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA), and the corresponding modifications to the Regulated Health Professions Act (RHPA).

FARPACTA

The Fair Access to Regulated Professions and Compulsory Trades Act, 2006.

Licensing

Authorizing a person to practise a regulated profession and/or to use a protected title. In this document, the meaning of *licensing* is the same as *registration*.

Mutual recognition agreement (MRA)

An agreement between organizations in different jurisdictions, whereby each recognizes the other's educational programs and/or professionals. The terms of the agreement may:

- limit recognition to people educated in a particular jurisdiction, or extend it to all of those licensed by that jurisdiction
- allow for full recognition and immediate licensing, or recognize individuals as meeting some but not all of the requirements for licensing

Objective structured clinical examination (OSCE)

A clinical exam designed to test skills such as communication, clinical examination, medical procedure and interpretation of results. This type of exam typically involves interacting with trained actors.

OFC

Office of the Fairness Commissioner (Ontario).

Registration

Authorizing a person to practise a regulated profession and/or use a protected title. In this document, the meaning of *registration* is the same as *licensing*.

Registration regulations

The legal document that describes the requirements that an applicant must meet in order to be authorized to practise a regulated profession or use a protected title. Registration regulations, and any changes to these regulations, must be approved by government.

Regulatory body (or regulator)

The body authorized by legislation to oversee a profession and protect the public interest. Regulatory bodies

have formal processes to:

- authorize qualified applicants to practise the profession or use a protected title
- investigate complaints and impose remediation or penalties
- ensure continuing professional development and competence

Regulatory bodies are governed by elected members of the profession and public members appointed by government.

RHPA

Regulated Health Professions Act (RHPA).

Transfer credit

Recognition granted to a student for courses taken at another educational institution.

Notes and references

1. Picot, G. and A. Sweetman. (2012). *Making it in Canada: Immigration Outcomes and Policies*. IRPP Study No. 29 (Montreal: Institute for Research on Public Policy).

2. Ontario's "fair-access legislation" refers to the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA), and corresponding provisions in the Regulated Health Professions Act (RHPA).

3. Houle, R. and L. Yssaad. (2010, September). "Recognition of Newcomers' Foreign Credentials and Work Experience." *Perspectives on Labour and Income*, 11 (9), 18–33.

4. Schuster, A., M. Vincenza Desiderio, and G. Urso (Eds.). (2013). *Recognition of Qualifications and Competences of Migrants* (Brussels: International Organization for Migration).

5. Hawthorne, L. and A. To. (2012). "The Impact of English Language Testing on Medical Registration Outcomes in Australia — Evidence and Outcomes 2005–2011." Presentation to the International Association of Medical Regulatory Authorities (IAMRA) conference held in Ottawa, October 2–5. Retrieved from http://iamra.com/pdf/IAMRA%20Conference%20-%20October%203/Presentation%20of%20Selected%20Oral%20Abstracts/The%20Impact%20of%20English%20Language%20Testing%20on%20Medical%20Regulation%20Outcomes.pd

6. Ontario Council of Agencies Serving Immigrants (OCASI). (2012). *Making Ontario Home 2012: A Study of Settlement and Integration Services for Immigrants and Refugees*. Retrieved from www.ocasi.org/MOH

7. Two sources:

Picot, G. and A. Sweetman. (2012). *Making it in Canada: Immigration Outcomes and Policies*. IRPP Study No. 29 (Montreal: Institute for Research on Public Policy).

Policy Roundtable Mobilizing Professions and Trades (PROMPT). (2004, July). *In the Public Interest: Immigrant Access to Regulated Professions in Today's Ontario*. A PROMPT Policy Paper (Toronto). Retrieved from http://www.cassaonline.com/prompt/Library/Docs/In%20the%20Public%20Interest%20Full.pdf

8. Toronto Immigrant Employment Data Initiative (TIEDI). (2012). *Immigrant Transitions from Underemployment to Skills-commensurate Employment*. TIEDI Roundtable discussion paper #4.

9. Lowe, S. (2012, July). *Transitioning Temporary Foreign Workers to Permanent Residents: A Case for Better Foreign Credential Recognition*. CERIS Working Paper No. 91 (Toronto: CERIS — The Ontario Metropolis Centre).

10. Toronto Immigrant Employment Data Initiative (TIEDI). (2012). *Immigrant Transitions from Underemployment to Skills-commensurate Employment*. TIEDI Roundtable discussion paper #4.

11. Grenier, G. and L. Xue. (2011, May). "Canadian Immigrants' Access to a First Job in Their Intended Occupation." *Journal of International Migration and Integration*, 12 (3), 275–303.

12. Forum of Labour Market Ministers. (2009). *A Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications*. Retrieved from http://www.hrsdc.gc.ca/eng/jobs/credential_recognition/docs/pcf.pdf

13. Ontario Ministry of Citizenship and Immigration. (2012). *A New Direction: Ontario's Immigration Strategy*. Retrieved from http://www.citizenship.gov.on.ca/english/keyinitiatives/imm_str/strategy/index.shtml

14. Grenier, G. and L. Xue. (2011, May). "Canadian Immigrants' Access to a First Job in Their Intended Occupation." *Journal of International Migration and Integration*, 12 (3), 275–303.

15. Two sources:

Schittenhelm, K. and O. Schmidtke. (2010, December). "Integrating Highly Skilled Migrants into the Economy: Transatlantic Perspectives." *International Journal*, 66 (1), 127–143.

Toronto Immigrant Employment Data Initiative (TIEDI). (2012). *Immigrant Transitions from Underemployment to Skills-commensurate Employment*. TIEDI Roundtable discussion paper #4.

16. Three sources:

Girard, M. (2010). "Match Between Pre- and Postmigration Education Among New Immigrants: Determinants and Payoffs." *Canadian Journal of Higher Education*, 40 (3), 81–99.

Girard, M. and M. Smith. (2013, May). "Working in a Regulated Occupation in Canada: An Immigrant–Native Born Comparison." *Journal of International Migration and Integration*, 14 (2), 219–244.

Zietsma, D. (2010, February). "Immigrants Working in Regulated Occupations." *Perspectives on Labour and Income* (Statistics Canada), February 2010, 13–28. Retrieved from http://www.statcan.gc.ca/pub/75-001-x/2010102/pdf/11121-eng.pdf

17. Guo, S. and H. Shan. (2013). "Canada." Case study about good practices and recommendations regarding recognition of foreign qualifications. In Schuster, A., M. Vincenza Desiderio, and G. Urso (Eds.), *Recognition of*

Qualifications and Competences of Migrants (Brussels: International Organization for Migration), pp. 229–253.

18. Forum of Labour Market Ministers. (2009). *A Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications*, p. 1. Retrieved from http://www.hrsdc.gc.ca/eng/jobs/credential_recognition/docs/pcf.pdf

19. Foreign Credential Referral Office (FCRO), Citizenship and Immigration Canada. (2011). *Strengthening Canada's Economy — Government of Canada Progress Report 2011 on Foreign Credential Recognition*. Retrieved from http://www.credentials.gc.ca/fcro/progress-report2011.asp

20. Two sources:

> Weeden, K. (2001). "Why Do Some Occupations Pay More Than Others? Social Closure and Earnings Inequality in the United States." *American Journal of Sociology*, 108(1), 55–101.

> Witz, A. (1990, November). "Patriarchy and Professions: The Gendered Politics of Occupational Closure." *Sociology*, 24 (4), 675–690.

21. Freidson, E. (1994). *Professionalism Reborn: Theory, Prophecy, and Policy*. Cambridge, U.K.: Polity Press.

22. *Non-traditional applicants* include both internationally trained applicants and those educated in non-accredited programs within Canada.

23. Mutual recognition initiatives must always consider brain drain and ethical recruiting. Some countries may wish to opt out of mutual recognition.

24. Accreditation typically happens at a national level. Some accreditation systems are bi-national, accrediting programs in both Canada and the United States. A few, such as the accreditation system for veterinary medicine, will also evaluate international programs for accreditation. The program must apply and pay a fee to be considered for accreditation.

25. Only five professions have no profession-specific approval process. Three of these five rely on government regulation of community and career colleges to ensure a minimum level of academic rigour. For the two other professions, for which there are a limited number of known and recognized academic programs in Ontario, the regulator has not established an approval process.
For accounting professions, applicants can take an accredited program or complete their prescribed course credit requirements later, while working on their professional program.

26. Health professions: Audiologists and Speech-Language Pathologists, Chiropractors, Dental Technologists, Denturists, Dietitians, Massage Therapists, Medical Radiation Technologists, Nurses, Occupational Therapists, Opticians. Non-health: Early Childhood Educators, Engineering Technicians and Technologists, Engineers, Geoscientists, Land Surveyors, Management Accountants, Social Service Workers, Social Workers.

27. Dental Hygienists, Optometrists, Physiotherapists, Teachers.

28. Architects, Lawyers.

29. When the paralegal profession was first regulated in 2007, the Ministry of the Attorney General insisted on requiring successful completion of an approved paralegal program in Ontario.

30. Chiropodists, Medical Laboratory Technologists, Pharmacists, Pharmacy Technicians, Respiratory Therapists.

31. Health: Dental Surgeons, Midwives, Physicians, Psychologists. Non-health: Chartered Accountants, Foresters, General Accountants, Veterinarians.

32. O. Reg. 202/94, s. 6(1) and 16(1) pursuant to the *Pharmacy Act*, 1991, S.O. 1991, c. 36.

33. Health: Dental Technologists, Medical Laboratory Technologists, Nurses, Optometrists. Non-health: Early Childhood Educators, Geoscientists, Land Surveyors, Social Service Workers, Social Workers.

34. Dietitians, Opticians, Pharmacists, Pharmacy Technicians, Respiratory Therapists.

35. Architects, Lawyers.

36. Health: Massage Therapists, Midwives. Non-health: Engineers, Teachers.

37. Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) s. 7.

38. Chiropodists and Denturists.

39. For example, internationally educated nurses have expressed challenges in finding courses that correspond to gaps identified through the Objective Structured Clinical Examination.

40. This pathway has since been suspended because of capacity limitations. The college continues to explore strategies to ensure successful and sustainable alternatives.

41. The OFC has heard direct feedback from bridging participants during site visits.

42. Based on program reports submitted to the Ministry of Citizenship and Immigration.

43. Dietitians, Engineers, Midwives, Nurses, Optometrists, Pharmacists, Pharmacy Technicians.

44. Lawyers, Medical Laboratory Technologists, Medical Radiation Technologists, Occupational Therapists, Physiotherapists, Veterinarians.

45. It is possible that individuals from other professional backgrounds have also pursued such opportunities directly with educational institutions. However, some academic programs will not accept applicants who already have a degree in the same discipline.

46. Zietsma, D. (2010, February). "Immigrants Working in Regulated Occupations." *Perspectives on Labour and Income* (Statistics Canada), February 2010, 13–28. Retrieved from http://www.statcan.gc.ca/pub/75-001-x/2010102/pdf/11121-eng.pdf

47. Zietsma, D. (2010, February). See previous note.

48. Public Policy Forum. (2008). *Improving Bridging Programs: Compiling Best Practices from a Survey of Canadian Bridging Programs* (Ottawa: The Public Policy Forum).

49. Association of Canadian Community Colleges (ACCC). (2012). *Six Innovations in Allied Health Education*. Retrieved from http://www.accc.ca/xp/index.php/en/programs/cdnpartnerships/ahealth/applied-research

50. Zietsma, D. (2010, February). "Immigrants Working in Regulated Occupations." *Perspectives on Labour and Income* (Statistics Canada), February 2010, 13–28. Retrieved from http://www.statcan.gc.ca/pub/75-001-x/2010102/pdf/11121-eng.pdf

51. Guo, S. and H. Shan. (2013). "Canada." Case study about good practices and recommendations regarding recognition of foreign qualifications. In Schuster, A., M. Vincenza Desiderio, and G. Urso (Eds.), *Recognition of Qualifications and Competences of Migrants* (Brussels: International Organization for Migration), pp. 229–253.

52. Foreign Credential Referral Office (FCRO), Citizenship and Immigration Canada. (2012). *Strengthening Canada's Economy — Government of Canada Progress Report 2011 on Foreign Credential Recognition*. Retrieved from http://www.credentials.gc.ca/fcro/progress-report2011.asp

53. Ontario Ministry of Citizenship and Immigration. (2012). *Helping Skilled Newcomers Find Jobs*. Press release, June 25, 2012.

54. Benzie, R. (2013, July 26). "Premiers to Ottawa: Fix Jobs Program." *Toronto Star*, p. A10.

55. RBC Economics. (2011, December). "Immigrant Labour Market Outcomes in Canada: The Benefits of Addressing Wage and Employment Gaps." Retrieved from www.rbc.com/newsroom/pdf/1219-2011-immigration.pdf