

**ONTARIO ASSOCIATION OF CERTIFIED ENGINEERING TECHNICIANS AND
TECHNOLOGISTS**

SUBMISSION

ON

**Discussion Paper: Future Enhancements to the Qualification Program for Ontario's
Building Practitioners (ERO 019-6433)**

February 16, 2023



ONTARIO ASSOCIATION OF CERTIFIED ENGINEERING TECHNICIANS AND TECHNOLOGISTS
10 Four Seasons Place, Suite 700
Toronto, ON M9B 6H7
Phone: (416) 621-9621

Introduction

The Ontario Association of Certified Engineering Technicians and Technologists (OACETT) is a non-profit, self-governing, professional association of over 22,000 members. OACETT is Ontario's independent certifying body for engineering and applied science technicians and technologists and confers the designations C.Tech. (Certified Technician) and C.E.T. (Certified Engineering Technologist).

OACETT welcomes the opportunity to provide feedback on the consultation on *Future Enhancements to the Qualification Program for Ontario's Building Practitioners*. OACETT has long advocated for changes to the current provincial qualification program as a means to better recognize and streamline potential practitioners with appropriate qualifications and certifications into the building industry. Any changes should be made in the context of public safety, and to that end, OACETT's commitment to public safety is enshrined in our Mission Statement:

OACETT is Ontario's independent certifying body for engineering and applied science technicians and technologists. The Association provides member certification, career-long educational opportunities, professional support for the benefit of the economy and safe and secure communities.

Our members represent many stakeholders affected by any change to the qualification program, both on the municipal and designer sides. OACETT shares the province's vision to improve and increase the capacity of municipalities and the building sector to respond to the growing pressures to design, build and approve homes more quickly and reach the goal of 1.5 million net new housing units over the next decade.

Action 1: Use of the Digital Building Code during Exams

OACETT agrees with the approach of providing a digital option to be used by individuals during the BCIN examination. The ministry should consider the potential impacts and advantages of the in-built search functionality of digital option over the traditional hard copy option. This may disadvantage individuals who are not inclined to choose the digital opportunity and expose the ministry to challenges against a two-tier process.

In light of this consideration, OACETT recommends disabling any search functionality in the digital option to ensure that candidates have a functional understanding in using the Ontario Building Code.

Action 2: Allow Candidates More Time per Question during Exams

OACETT believes that the current number of questions per exam is not the core problem and is inherently a fair reflection of good practice. While we acknowledge that the ministry has highlighted a valid issue, reducing the number of questions within the 3-hour exam timeframe will not provide a correct remedy because it is not addressing the right problem.

One of the primary challenges for many individuals contesting the exam is that the questions are frequently a test of a candidate's understanding of complex grammatical structure and not the more appropriate test of their technical knowledge. Clarity is key to reducing any barriers to entry and ensuring an equitable experience for all candidates.

OACETT believes the intent of any changes to the exam structure should be to reduce the number of candidates who were unable to pass the exam due to grammatical comprehension, thereby achieving the ministry's ultimate goal of a higher success rate and more qualified

individuals. Our members' experience with successfully contesting the exam illustrates anecdotally the frustrating aspects of the exam that are outside the technical content. Our members can play a key role at the table providing support in a review process to rewrite the exams.

OACETT recommends that the Ministry undergo a comprehensive review of each exam and ensure the relevant stakeholders, including OACETT, are at the table. A comprehensive review of the process should include a review of how questions are generated and reviewed to include informational and contextual content relevant to the primary goal of Code knowledge.

Action 3: Mandatory Training

OACETT highly endorses instituting pre-qualification training for new building practitioners as a condition for writing BCIN exams. Many industry associations have a current model of training that integrates the exam within the course. OACETT's current Road Construction Designation delivers a robust model for any pre-qualification training. The requirements include a combination of courses, exams, and work experience. This type of model would better prepare candidates to challenge the BCIN exams and enhance the success rate. OACETT would be happy to share more details about the structure of our program at the ministry's pleasure.

Action 4: Providing Alternative Ways to Enter the Sector

We agree with the Ministry that BCIN exemptions are an appropriate way to provide an expedited pathway for building practitioners with related education and field experience, would create more capacity, and ensure the qualification process is appropriately fast-tracked for people with a demonstrated technical knowledge of the Building Code.

In particular, OACETT's current certification model could be an appropriate prerequisite for exemptions to particular BCIN exams, based on a combination of an individual's certification, educational background and work experience. OACETT certification includes graduation from a two or three-year college program within specific disciplines that provide for building science and building code knowledge as well as a verifiable two-year field experience requirement. OACETT can ensure that these certified members can demonstrate code knowledge in their exemption status from particular BCIN exams.

Further, our certification process includes a rigorous review of academic credentials. This can help to verify that a group of certified individuals with specific educational background can be exempt from challenging certain BCIN exams based on their verified curriculum. Our mandatory CPD requirement can further ensure that our certified members who are exempt from particular BCIN exams maintain specific code knowledge. OACETT believes this framework would provide the criteria needed to verify a certified member's qualification for exemption and ensure any exemption maintains the high standard and the protection of public safety that is the intent of the current BCIN system. We would work with the Ministry on the details of a program, the establishment of criteria and the specifics on which exams would qualify for exemption based on the expertise of each member.

OACETT recommends that our members be exempted from writing certain BCIN exams based on the framework listed above and will work with the Ministry to establish the criteria and specific instances for exemption, as this requires a level of detailed review that was not possible during the consultation timeframe. We are recommending that legal exams not be included in any exemption policy as it prepares candidates to understand the role and legal framework of the Building Code Act, which is foundational as a building code practitioner.

Action 5: Restructure Exams to Become a Qualified Building Practitioner

The current qualification system already provides a model the Ministry is pursuing in terms of flexibility. While the potential integration of certain exams into a specific class of buildings may prove beneficial and may increase the number of people with Code knowledge in the industry, our members feel that any legal exams should be excluded from any planned exam integration, as referenced under Action 4.

Action 6: Knowledge Maintenance Requirements

6.1 What are your thoughts on the approach outlined above? Do you see this as beneficial to you or do you have any concerns?

Knowledge maintenance requirements are essential to the accurate implementation of new Code requirements. OACETT's current mandatory CPD requirement was established because the association felt that it was essential for professionals to remain current in their field of practice in order to retain their certification.

6.2 In your opinion, should the scope of learning attestations for building practitioners be limited to only Building Code amendments? If not, what other learning topics should be included?

For the purposes of maintaining your BCIN qualifications, any learning attestations should be limited to building code amendments.

6.3 How do you think the ministry should share information on new Code amendments with you so that you can review in an appropriate level of detail that adds to your Code knowledge?

While the Ministry has a leading role in sharing new Code amendments, industry and professional associations such as OACETT, with our mandatory CPD requirement, are prime candidates to provide such Code amendments to its membership. Particularly for designers, OACETT can deliver ourselves, or deliver in partnership with other stakeholders, a Code

amendment framework model that ensures our membership in the building industry is well-informed and up-to-date on changes.

OACETT feels our current CPD program could be leveraged to provide the required content that the ministry anticipates for designers. Our recommendation would not duplicate any existing training that is part of the Ontario Building Officials Association (OBOA) Certification Program but rather provide a solution that is specific to designers. Our mandatory CPD requirements include confirmation of completion to verify all training and a three-year cycle to complete any mandatory CPD with a compliance audit. This demonstrates the rigor and professionalism of our CPD system, which is already in place and ready to be used as a solution for our members who are building practitioners.

Conclusion

We applaud the Ministry for acknowledging issues within the Qualification Program and for recommendations based on stakeholder feedback. OACETT believes that the actions proposed will support the government's goal to build capacity in the building industry as part of its mandate to build more than 1.5 million new homes over the next ten years. OACETT believes our recommendations will ensure that any future revamped Qualification Program will ultimately not water down the requirements for designers to become skilled building practitioners but rather implement solutions that broaden access to the necessary qualifications more quickly, based on an individual's certification, education and work experience, and ultimately raise the bar in terms of quality design submission and overall building code knowledge.

On behalf of our membership, we thank you for the opportunity to provide you with recommendations and possible resources. OACETT looks forward to further developing a

strong partnership with the Ministry on this matter and to meeting with the Ministry shortly to discuss proposed opportunities to work together.