

By JENNIFER COOMBS

The presentation of the Licensing Process Task Force's (LPTF) final report at Council's November meeting capped off almost three years of work that was prompted initially by a review of the licensing process by the CEO/Registrar in September 2004. That review indicated the licensing process set out in the regulation was not adequately supported by the *Professional Engineers Act* (PEA).

Council struck the LPTF in January 2005 to review the licensing issues raised in the CEO/Registrar's licensing review and to make recommendations on how best to deal with them. The LPTF was also tasked with looking at the overall effectiveness of PEO's admission requirements in terms of public protection, fairness to applicants, timeliness and operational efficiency.

The LPTF's first report reached Council in March 2006 and, after many months of further interim reports, stakeholder consultations and revisions, the 50-plus recommendations contained in the report were put before Council.

#### General licensing process

Council approved a recommendation that defines what will be acceptable for PEO documents describing the requirements, policies and processes for licensure. In particular, these documents will need to be applicant-centric, transparent, objective, impartial and fair, and align with the fundamental requirements for licensure, including knowledge, skill and character. They will need to specify how and when an applicant can or must meet each requirement and the tools that will be used to assess the applicant against the requirements, and describe the independent peer review process used to assess applicant qualifications.

Council also endorsed the concept that independent peer review by P.Engs will continue to play a central role in PEO's licensing process. P.Engs will continue to be involved in activities related to assessing applicant qualifications, including participating in Academic Requirements (ARC) and Experience Requirements (ERC) com-

## Council passes majority of LPTF recommendations

443rd AND 444th MEETINGS, NOVEMBER 15, 16 AND DECEMBER 17, 2007

mittee reviews and interviews, Registration Committee hearings, and setting, administering and marking Professional Practice Examinations (PPE), among other tasks.

A new provision to Regulation 941 is to be added to deal with licence applicants who are already registered in another jurisdiction with which PEO has a mobility agreement in place. These applicants will be deemed to meet all licensure requirements except the good character requirement, if the applicant has passed the PPE in a Canadian jurisdiction or been licensed in Canada for at least five years, provides satisfactory evidence of having 12 months of Canadian experience, and has not previously been turned down for a licence by PEO.

Each applicant will now also need to get either a Canadian criminal check or a Canadian local police records check. Other approved changes to the licensing process include that applicant files will be kept open for a maximum of eight years from the date of application, and the CEO/Registrar will automatically check all applicants against Engineers Canada's national database of licence holders when it becomes available, regardless of an applicant's declaration of whether they have ever applied for a licence, been licensed, or been disciplined in another Canadian jurisdiction.

The CEO/Registrar has been tasked with establishing criteria for Council to approve on how PEO should handle responses to character-related questions on the licence application form that cause concern, and issues raised by an applicant's supervisor, referee or experience monitor.

All the approved changes to the licensing process concerning the good character requirements and processes will apply to all types of PEO licence.

#### Academic matters

Council approved several motions related to the academic component of achieving licensure:

- that the ARC's current practices and assessment tools for performing academic assessments of applicants continue;
- that applicants determined by the ARC to lack the required academic breadth be allowed to demonstrate their knowledge of the PEO syllabus by passing at least one ARC-specified technical exam, or by completing ARC-approved courses of study that include knowledge assessments;
- that PEO encourage Ontario engineering schools to develop cost-effective study programs to address applicant knowledge gaps, and support the schools' efforts to receive Ontario government funding for them;
- that applicants who meet the academic breadth requirement (i.e. whose transcripts match the PEO syllabus with no more than two gaps) be deemed to have met the necessary academic requirements on the date of their engineering degree;
- that applicants with accredited degrees awarded more than eight years before the date of application be assessed against the current PEO syllabus;
- that the ARC advise the CEO/Registrar of alternative means, if any, to demonstrate compliance with the requirements for applicants who have not met the academic requirements;
- that Council approve at least annually the list of academic programs accredited by the Canadian Engineering Accreditation Board (CEAB);
- that applicants whose academic credentials do not meet objective criteria,

such as a degree from a CEAB-accredited engineering program or qualification under the Inter-Association Mobility Agreement, be referred to the ARC for assessment;

- that an applicant's file may be closed by the CEO/Registrar if the applicant has not made satisfactory progress towards demonstrating compliance with the academic requirements by passing technical exams specified by the ARC; and
- that the ARC may refer the experience of an applicant to the ERC for an assessment as to whether the experience demonstrates that the applicant has met the academic requirements.

### Experience matters

Council approved several motions related to the experience requirements component of the licensing process:

- that the ERC's current practices and assessment tools for assessing the experience of applicants continue;
- that Council approve from time to time the criteria and rules for applying the criteria in PEO's *Guide to the Required Experience for Licensing as a Professional Engineer in Ontario*, which define the skills and attributes necessary for licensure, and that the experience requirements in Regulation 941 be amended to reference the guide; and
- that PEO's experience assessment criteria and procedures be strengthened and communicated to applicants, supervisors, experience monitors/reviewers and referees.

In addition, Council approved amending section 33.(1)3 of the regulation to indicate that up to 12 months of the required practical experience may be acquired after an applicant is deemed by the ARC to have completed Basic Studies and Group A Professional Subjects from the PEO syllabus, with the remainder of the practical experience to be acquired after the academic requirement of a bachelor's degree from an accredited Canadian engineering program or equivalent engineering educational qualifications recognized by Council have been met. Previously, the 12 months of experience could be acquired only after the applicant had completed one half of

the classroom component of the degree or equivalent educational qualifications.

Council also approved amending this section of the regulation to reflect that applicants must demonstrate that they have acquired experience in the practice of engineering that meets the criteria approved by Council resolution and published in PEO's *Guide to the Required Experience for Licensing as a Professional Engineer in Ontario*.

### Notices of determination

Although the ARC and ERC will continue to conduct informal, internal reviews of their assessments before a Notice of Determination (NOD) is made (which informs applicants of the outcome of an ARC or ERC assessment), Council authorized creating a new mechanism to provide a second, independent review of ARC and ERC committee decisions. This aligns with the *Fair Access to Regulated Professions Act* (FARPA), and might eliminate the need for applicants to request Registration Committee hearings to deal with negative NODs.

Council also approved establishing a time standard for making a licensing decision once an applicant has submitted all of the required information for licensure.

### Limited and provisional licences

Council approved enabling applicants who do not meet the academic requirement for licensure to be considered for a limited licence without reapplying or paying an additional application fee.

Also, Council approved reviewing the definitions of academic and experience requirements for a limited licence for consistency with those of the P.Eng. licence.

Council also approved a recommendation that all applications for a limited licence or licensed engineering technologist designation, when it is approved, be referred to the ERC, to determine whether the applicants have met the appropriate experience requirements for these designations.

Provisional licences will be phased out and replaced with certificates of application status at no cost to applicants for any type of licence.

### Examinations

Under recommendations approved by Council:

- applicants will be permitted to write the PPE whenever it is offered. Previously, applicants had to pass the PPE not later than two years following the later of either their application date or the successful completion of all other examination requirements; and
- PEO will continue to administer technical exams, which will be offered at least twice a year. Fees for sitting any type of exam will be \$150, which will require revision of section 85(1) of Regulation 941. A new section will be added to the regulation to reflect that the cost of establishing and monitoring a gap exam program is \$370.

### Tabled motions

Several recommendations and their associated motions were tabled, to be brought back for consideration at the January 2008 meeting. These included a motion that Council endorse the guiding principles of the Evolution of Engineering Admissions (E<sup>2</sup>A) Task Force. These principles comprise overriding principles to protect and serve the public interest and assure competency, primary principles of fairness and transparency and subordinate principles of adaptiveness of process, consistency of process and outcome, relevance and clarity of process, dispatch, elimination of subjectivity and discretion, the maintenance of current standards, licensee mobility, non-discrimination, predictability, clear delineation of roles, economy of process and simplicity.

Also tabled was a call for Council to acknowledge PEO's duty as a regulated profession under FARPA to provide registration practices that are transparent, objective, impartial and fair, on the basis of several Councillors objecting to approving a motion, the substance of which is already required of PEO by law.

While Council approved a motion that the regulation be revised to require all licence applicants who meet the academic breadth requirement to demonstrate that they meet the academic depth requirement by passing confirmatory exams, several motions were tabled relating to applicants' academic breadth and depth requirements. Included in this list was a motion that the academic breadth and depth requirements

for licensure be redefined in the regulation, and one that certain classes of applicants who have met PEO's academic breadth requirement (including those who have graduated from CEAB-accredited programs within the last six years, those with bachelor of engineering degrees from programs approved by Council for academic depth, and those who have satisfied the ARC that they meet the academic depth requirement) be exempted from writing confirmatory exams.

Two motions related to the steps PEO would take as a result of an applicant's good or poor performance on confirmatory exams (e.g. exemption, additional assigned exams, etc.) were also tabled.

On a related note, Council did approve a motion that an objective test for exemption from confirmatory examinations be added to the regulation before PEO enters into any mutual recognition agreements with other jurisdictions.

### Defeated motions

Council defeated two recommendations related to the academic component of the licensing process:

- that a university degree in engineering or applied science be established as the minimum academic standard to begin the licensing process, thus eliminating the examination route to licensure; and
- that no more than nine technical examinations could be required of an applicant.

Council also defeated motions relating to its ability to waive or vary licensure requirements:

- that the PEA be amended to remove Council's ability to waive academic and examination requirements; and
- that the regulation be amended to delete the sentence, "However, the Council may vary or waive this requirement in circumstances in which it considers it to be in the public interest to do so" from section 33.(1)4, which refers to the 12 months of experience applicants must acquire in a Canadian jurisdiction under the supervision of one or more licensed P.Engs.

Council directed the CEO/Registrar, in consultation with the LPTF, to prepare an implementation plan for the approved recommendations and finalize the required amendments to the regulations, for approval by Council.

To view the LPTF's full report and the minutes of the 443rd Council meeting, which include the full text of all the motions related to the report and recommendations, visit PEO's website at [www.peo.on.ca](http://www.peo.on.ca).

### New PEO headquarters

At the June 2005 meeting, on the recommendation of PEO's Accommodation Task Force and realtor CB Richard Ellis, Council decided that when the lease expires at PEO's current Sheppard Avenue headquarters in December 2009, PEO would seek to buy or build a facility of its own in downtown Toronto. Reasons cited for the move were a reduction in cost, the possibility of branding the property for better visibility, space shortages, and proximity to government and universities.

Since that time, many properties have been considered, some located downtown, some in other locations, but none having the right mix of features Council desires for PEO's new headquarters.

At an in-camera session at the December meeting, Council therefore reconfirmed its criteria for the search for a PEO headquarters, including that PEO should seek a building of at least 50,000 square feet with high visibility in downtown Toronto and preferably with LEEDs certification, or a property suitable for constructing a building that supports these requirements. It is envisioned that PEO's headquarters will house not only office space but meeting space (auditorium, public meeting rooms, etc.), public archive space to showcase professional engineering, examination rooms and a business centre for the use of members and applicants.

Council determined the building should also have the following features:

- a central Toronto location (between Avenue Rd. and Bayview Ave. and Sheppard Ave. and Front St.);

- be in the vicinity of employers of professional engineers;
- be in an area with attractive buildings and other public amenities of interest to staff and volunteers;
- be within 2 kms of business class hotels and restaurants;
- be in a location that aids in attracting and retaining volunteers and staff;
- nighttime security for volunteers and staff, able to meet PEO's security requirements;
- accessible by car and transit, close to a subway station;
- safe parking space for 50 cars, and desirable to have additional public parking for 100 cars within 0.5 km;
- support the professional image of PEO; and
- have no environmental concerns.

To facilitate the purchase of a new building with a budget of up to \$30 million, Council approved an amendment to By-Law No. 1 to prescribe an annual membership fee of \$220. The current fee is \$200. Confirmation of the bylaw amendment will be included with the 2008 election ballots (see special feature, pp. 12-14).

### Key performance indicators

One of the strategic goals identified in the 2005-2009 Strategic Plan was to "maximize the reach and effectiveness of PEO's regulatory function within the current *Professional Engineers Act* to better serve and protect the public interest, thus elevating the value of the licence."

To that end, a KPI Design Project was established to define, assess and select key performance indicators (KPIs), or measures of PEO's regulatory performance and effectiveness. The project was completed and presented to Council in November 2006, but rather than approving the recommendations Council directed that a task group of Councillors be formed to revisit the matter and return to Council with a plan to move forward.

At the June 2006 meeting, Council approved the task group recommendation to proceed with a new KPI Design Project, at a cost not to exceed \$2,000.

At its November meeting, Council received the report of the new KPI Design Project, which concluded that since Council has discontinuous membership, staff are in the best position to determine PEO's KPIs.

Council also approved several recommendations to proceed to completion of the KPI Design Project:

- annually the CEO/Registrar is to establish goals and objectives for PEO that will require each department to establish its specific goals and objectives relevant to its expertise or responsibility;
- all specific goals and objectives are to reflect and build on the principal object [paragraph 2.(3)] and additional objects [paragraph 2.(4)] of the PEA and are to be considered the principal goals of PEO;
- Council is to approve all departmental specific goals and objectives, which are to include continuous improvement goals and objectives, as well as specific goals and objectives achievable in the current year and are to be measurable in the form of subjective statements of achievement and/or numerical or graphical illustrations of trends related to activities to achieve an objective;
- the subjective statements of achievement and/or numerical or graphical illustrations of trends are to relate to activities to achieve an objective (the measurements) of each goal and the objectives are to be considered PEO's key performance indicators;
- the CEO/Registrar is to report at the June and January Council meetings on the progress of each key performance indicator;
- Council is to decide at its last meeting in each calendar year those KPIs that should or need to be made public; and
- each goal and objective is to be measured for progress and performance.

The first set of goals is to be drafted and presented to Council at the January 2008 Council meeting for approval.

### C&D audit implementation

The recent independent audit of PEO's complaints and discipline processes by



David Zimmer, LLB, MPP Willowdale and parliamentary assistant to the attorney general (left), with PEO President Walter Bilanski, PhD, P.Eng., was a special guest at the November 16 Council meeting. At the meeting he praised PEO's courage in challenging the building code decision in court, and said that new Attorney General Chris Bentley is looking forward to engaging with the engineering profession.

WeirFoulds LLP (see *Engineering Dimensions*, November/December 2007, pp. 37-38) included several recommendations for changes to PEO's operations. The overall implementation plan was approved by Council at the September 2007 meeting and the following are first steps in the process.

### Lay LGAs on Complaints Committee

One of the findings of the audit was that non-P.Eng. Lieutenant Governor Appointees (lay LGAs) could be members of the Complaints Committee provided one P.Eng. LGA is also on the committee. PEO's practice has been to have only P.Eng. LGAs and PEO members serve on the Complaints Committee.

As part of the approved implementation plan, a policy review was carried out to determine the benefit of having lay LGAs and other members of the public serve on this committee.

Council opted to add lay LGAs to the Complaints Committee, which expands the pool of potential LGAs to serve on the committee, maintains continuity among P.Eng. LGAs, and provides additional public scrutiny in the complaints review process by having a lay perspective.

However, Council defeated the option of adding members of the general public to the Complaints Committee at this time,

citing turnover and accountability concerns, and added costs for recruiting and training.

### Negotiation of resolutions

At its November 2006 meeting, Council passed several motions about seeking costs as part of penalty decisions and settlement discussions, which have affected PEO's ability to reach agreements on facts and negotiate resolutions on some discipline matters. The result has been more contested hearings.

The WeirFoulds audit recommended that PEO consider returning to its previous practice of allowing prosecuting (i.e. PEO's) counsel to initiate settlement discussions with affected members and to address issues of cost in the context of these discussions.

Council thus rescinded the motions passed at the November 2006 Council meeting, which were that:

- “1. The Registrar shall make a submission of costs to the Discipline Panel in all cases after the Discipline Panel has made a finding of guilt and penalty has been determined.
2. The Registrar shall seek reasonable recovery of costs incidental to the investigation during both the complaint and discipline processes, comprising of fees payable to prosecution counsel, expert witnesses, expert reports and witnesses.
3. The Registrar shall inform every practitioner referred to Discipline that:
  - (a) PEO prosecution counsel is interested in establishing an agreed statement of facts;
  - (b) PEO prosecution counsel will entertain settlement discussions with respect to guilty plea and penalty terms only if initiated by the practitioner;
  - (c) PEO will make submissions for cost awards after there is a finding of guilt and penalty has been determined—this is not negotiable as part of any plea agreement;
  - (d) PEO will request publication with names in all cases where there is a finding of guilt—this is not negotiable as part of any plea agreement; and
  - (e) The Discipline Panel remains independent of the prosecution, and will make its own decisions on guilt and penalty.”

After rescinding the motions, Council instituted the following guiding principles to guide its resolution negotiations on discipline matters, which are common among regulators of professions and preserve Council's direction to ensure that every practitioner referred to discipline is aware of the option to have a negotiated settlement.

1. The Discipline Panel is independent of the Council, the Registrar and prosecution counsel, and will make its own decisions on guilt and penalty;
2. The Registrar shall inform every practitioner referred to Discipline that:
  - (a) PEO prosecution counsel is interested in establishing an agreed statement of facts,
  - (b) PEO prosecution counsel may initiate and will entertain settlement discussions with respect to guilty plea and penalty terms,
  - (c) PEO will generally request publication with names in all cases where there is a finding of guilt, and
  - (d) Should there be an agreed settlement, it must be presented to a Discipline Panel and that the Discipline Panel is independent of the Council, the Registrar and prosecution counsel, and will make its own decisions on guilt and penalty;
3. The objective of entering into resolution negotiations is to achieve an outcome that is fair and just, serves and protects the public interest, and is expeditious and cost effective;
4. The Registrar shall seek a negotiated resolution in all matters that have been referred to a discipline hearing by first seeking agreement as to the relevant facts and then by seeking agreement as to the appropriate sanctions and costs (if any);
5. The Registrar shall fairly consider the interests of the licence holder during resolution negotiations;
6. The Registrar will not issue ultimatums or attempt to coerce a resolution by predicting the sanctions that might be sought or obtained at the conclusion of a contested hearing;

7. Where a negotiated resolution cannot be achieved, the appropriate alternative is a contested hearing. The Registrar shall continue to be open to negotiating a resolution up until the point when a Discipline Panel delivers its decision in the matter; and
8. The Registrar shall seek reasonable recovery of costs incidental to the investigation during both the complaint and discipline processes, comprising of fees payable to the prosecution counsel, expert witnesses, expert reports and witnesses, where the conduct or course of conduct of a licence or certificate holder has been unreasonable, frivolous or vexatious or a party has acted in bad faith."

### PEO/OAA joint committee

Since the court ruling in favour of PEO on amendments to the *Ontario Building Code*, PEO and the Ontario Association of Architects (OAA) have continued to work jointly to improve the building industry. Council passed two motions at the November meeting that will have PEO working with the OAA on an ongoing basis to improve communication and resolve building code matters that arise with municipal chief building officials.

The first motion authorized the publication of a joint bulletin, *Design and General Review Requirements for Buildings in the Province of Ontario*, for the use of building officials and registered code agencies. The joint bulletin, which was distributed to building officials in early January 2008, provides a synopsis of the requirements of the *Professional Engineers Act* and the *Architects Act* with respect to building design. The intent of the joint bulletin is to provide clarity to building officials and code agencies, to help them carry out their obligations under section 9 of the *Building Code Act*, and in particular to refer drawings, plans or specifications accompanying applications for permits to PEO or the OAA if they are unsure whether the documents contravene either of the two acts.

The second motion authorized the creation of an OAA/PEO Joint Liaison

Committee to resolve building code-related issues.

Following up on this matter at the December meeting, Council approved the terms of reference for the PEO/OAA Joint Liaison Committee and a 2008 budget of \$10,000 for PEO members' expenses related to their participation on the committee.

The committee's approved mandate is to "coordinate the enforcement of the *Professional Engineers Act* and the *Architects Act* with respect to required engineering and architectural qualifications for the design and general review services related to building construction." The committee will refer issues to the PEO/OAA Joint Practice Board, Council, the Enforcement Committee or other groups, as necessary, and develop and issue bulletins to building officials to clarify emerging issues and disputes.

### C of A liability insurance

Currently, section 34 of the PEA requires Certificate of Authorization (C of A) holders to have liability insurance in accordance with Regulation 941 to cover their areas of practice. Section 47(3) of the regulation allows holders to opt out of this requirement, if they disclose to each client that they are not insured and the client acknowledges the disclosure. In the past, PEO has not measured the extent to which holders opt out of this requirement, why they do so, or the impact of opting out.

One of the six projects Council identified at its June 2007 workshop for its 2007/2008 policy agenda was a research project to answer, among other questions, the extent to which practitioners use the opt out provision, the reasons why, and what type of entity typically opts out of insurance provisions.

While much of the information required to complete the report was available from PEO's database, one question remained: Why do practitioners choose the disclosure option? To answer the question, PEO surveyed C of A holders who had selected the disclosure option. Of those who responded (only 8.5 per cent of the C of A holders using the disclosure option), it was found that incorporated companies with one P.Eng. and sole practitioners chose the

option most often. The reason cited most often was prohibitive cost. A small number also indicated that despite best efforts, they were unable to find insurance providers.

Based on the research study, Council chose to make no change to the C of A professional liability insurance requirements in the regulation. However, Council also directed the CEO/Registrar to report to Council regularly on the number and type of organizations that select compulsory disclosure on their C of A application or renewal form, in order to better understand the issue and determine if further action is required.

In making its status quo decision, Council considered both the risk to C of A holders who provide services without professional liability insurance coverage that they may be exposing themselves to financial liability should claims be made against them, and the risk to PEO that the attorney general and the public may view the status quo as inadequately protecting the public.

### Proactive enforcement pilot

At its November meeting, Council was provided a status report on the one-year enforcement pilot project designed to proactively investigate the extent of enforcement violations.

In 2007, the *Licence Please!* outreach video guide, available on CD-ROM and the PEO website, was produced, and widespread distribution begun.

Presentations were made to introduce the new information resource and encourage reporting of potential violations, including at the September round of five regional congresses, and to a meeting of engineers at the Ontario Ministry of Labour. Further presentations are planned at meetings of the Technical Standards and Safety Authority and the Office of the Fire Marshal. In addition, a breakfast meeting for human resources professionals was held and further such meetings are planned.

The focus for the remainder of the pilot project, which will conclude in March, is to communicate the requirements of the PEA as broadly as possible to stakeholders, using the video guide as a marketing tool. As the project progresses, focus will shift to the

investigation of leads generated by the communication efforts.

### CESC conflict of interest

At its November 2007 meeting, Council reviewed a submission from a member concerned with potential conflicts of interest for members of the Central Election and Search Committee (CESC) who run for election to Council.

Council tabled the accompanying motion to allow the CEO/Registrar to prepare recommendations for Council's consideration.

At the December meeting, Council heard that there are two situations in which a conflict of interest could arise for a member of the CESC choosing to run for election. In the first instance, a CESC member could use their position to encourage less qualified candidates to run or discourage more qualified candidates. In the second situation, a CESC member running for Council and assisting the Chief Elections Officer in receiving and responding to complaints about the conduct of the election could conceivably be placed in the position of dealing with a complaint about his or her own election campaign or conduct.

Council recognized the potential for conflict and approved a motion that as a matter of policy any member of the CESC who decides to run for election to Council will be requested to resign from the committee. Council also directed the CEO/Registrar to amend section 12 of Regulation 941, as there is no provision in the regulation for Council to remove a member of the committee, to fill vacancies, or to prevent members of the CESC from running in an election.

### Change to IAMA

At the November meeting, Council endorsed a proposal to replace the notwithstanding clause in the Inter-Association Mobility Agreement (IAMA)—an agreement designed to improve the mobility of professional engineers within Canada—with a due diligence clause.

The notwithstanding clause states: "Notwithstanding the provisions and intention of this agreement, constituent associations/Ordre reserve the right to review the qualifications of any applicant

from another Canadian jurisdiction. In such instances, the signatories may assign any additional requirements for admission they deem necessary, consistent with their admission procedures."

In keeping with the support of this action by all of the other Engineers Canada constituent associations/ordre, Council approved a motion that this clause be replaced by a due diligence clause that states:

"Constituent associations/Ordre are obligated by their legislation to conduct the required due diligence regarding the qualifications of all applications to ensure that they meet their licensing requirements.

The constituent associations/Ordre agree to track and annually report to Engineers Canada, for the purpose of preparing a confidential report to the constituent associations/Ordre, the following regarding IAMA applicants:

1. Total number of applicants who are licensed in another Canadian jurisdiction.
2. Total number of applicants licensed by the host association/Ordre and the mean time from the date the application was received for each of the following categories:
  - (a) licensed based on initial application, including status confirmation from the home association and/or the national database
  - (b) licensed without the need for further contact with the home association
  - (c) licensed after receiving additional information from the applicant, (e.g. Canadian experience, work summary, place of birth, gender, photo, etc.) or the home association/Ordre
  - (d) licensed after the applicant has met additional requirements, which may include but are not limited to appearing for an interview, writing of exams, reports, essays, or thesis.
3. Total number of applicants refused a licence."

Council believes a due diligence clause is more reflective of the duties a regulatory body has under its Act. In addition, the change will promote the consistent reporting of information for the purpose of ongoing improvement. ❖