Decision Note - Engineering Intern (EIT) Program: Policy Options

Agenda Item No.	C-568-7.1	
Purpose	For RPLC to present Council with a policy proposal for an Engineering	
	Intern (EIT) Program.	
Strategic/Regulatory Focus	Regulatory	
Motion	That Council endorses the establishment of an ["EIT as a Pathway" or	
	"EIT as a Pre-Requisite"] program as discussed at Appendix A and	
	directs RPLC to bring a detailed program proposal, refined by further	
	stakeholder consultation and analysis, and accompanied by a high-level	
	action plan for implementation, to Council's June 2025 meeting.	
	(requires simple majority)	
Attachments	Appendix A – EIT Options and Analysis	
	Appendix B – Jurisdictional Scan	
	Appendix C – EIT Engagement Statistics	
	Appendix D – Summaries of Focus Groups and Online Consultation	
	Responses	

Summary

Council directed RPLC to bring an EIT policy proposal to Council's April 2025 meeting. Following extensive research and stakeholder engagement, RPLC was presented with two policy options for a revised EIT program at its March meeting. RPLC is bringing both options to Council, available at **Appendix A**, without a recommendation. Council is to determine which policy option it prefers, so that a detailed EIT program proposal can be developed, including with further stakeholder consultation. One option is an EIT program that acts as a pathway to those seeking licensure. The other option is an EIT program that is a pre-requisite for those seeking licensure. Given the drawbacks of an EIT "pre-requisite," including the exceptions to it and an absence of risk to justify a regulatory intervention, staff recommend that Council endorse an "EIT as a Pathway" program.

Public Interest Rationale

An engineering intern program with a regulatory function supports those seeking licensure and helps PEO fulfil its public interest mandate.

Background

At a day-long facilitated plenary session on the EIT program in November 2024, Councillors defined the purposes of an EIT program as to capture those who have engineering degrees but are not inclined to become licensed, and to offer a clear path into the profession with support for those working towards acquiring experience for licensure. Councillors also indicated they wanted a regulatory program with eligibility criteria and regulatory oversight. Following this discussion, Council committed to the reinstatement of the EIT Program at its November 2024 meeting and directed the RPLC to provide it with a policy proposal, supported by inclusive and comprehensive stakeholder input, no later than April 2025.

Results of a jurisdictional scan are available at **Appendix B**. The two policy options proposed fall within the range of the engineering intern and professional intern/trainee programs reviewed.

PEO's stakeholder engagement strategy included current and former EITs, students, employers, the Strategic Stakeholder Advisory Group, engineers on PEO staff, PEO Chapters, Ontario Deans, the Ontario

Society of Professional Engineers, and other relevant parties. In addition, a consultation paper was posted on the PEO website and promoted through social media channels, to encourage interested parties to provide their comments. The feedback received heavily informed the development of the two policy options. EIT engagement statistics are available at **Appendix C**, and summaries of focus groups and the online consultation are available at **Appendix D**.

The first policy option is "EIT as a Pathway" which would provide participants with one pathway by which they could indicate commitment to the profession and meet the experiential requirement for licensure. Registration in the program would be elective; however, the program requirements would be mandatory. The second option is "EIT as a Pre-Requisite", where all individuals seeking a P.Eng licence would be required to complete the program (subject to some exceptions, such as international applicants who are ready for licensure). Either policy option would require changes to the *Professional Engineers Act*, *Regulation 941*, and By-Law No 1.

Considerations

- Absence of risk: In April 2024, Council was presented with a <u>policy impact analysis</u> as part of a discussion on the future of the EIT program. This analysis found an absence of risk such that a mandatory (pre-requisite) EIT program would be an inappropriate regulatory intervention.
- Legislative amendments: Given that title use is perceived by stakeholders as the main value of the EIT program, a revised "pathway" or a "pre-requisite" EIT program would require amending the *Professional Engineers Act* (along with the regulation and bylaws). Section 40 (3.2) of the Act establishes an offence where a person who is not an "engineering intern" under section 20.1 uses the title, including "EIT." Under section 20.1 of the Act, for someone to be accepted by the Registrar as an "engineering intern," they must make a request to become one at the time they apply for a licence. Due to the requirement that a licensure application decision be made in six months (three months as of July 1st) under the FARPACTA regime, a program in which individuals are meant to gain experiential qualifications for licensure is untenable if they are to be considered "engineering interns" or if the associated titles are to be used as part of the program.
- **Both program types** would provide prospective P.Eng. applicants with benefits and support on their licensure journey.
- "EIT as a Pathway": more flexible and easier to operationalize than a "pre-requisite" program; however, it would require significant resources to promote the value of the program and encourage participation as program enrollment would be voluntary, and those without EIT status would be allowed to do the same work as those with EIT status.
- "EIT as a Pre-Requisite": would be more complex to operationalize and would work best for CEAB graduates in need of experience. Many individuals (e.g. those who are licensed in another Canadian jurisdiction or international applicants who are ready for licensure) would be exempted from this program. Program exclusions could also result in the conferring of benefits to one group of applicants to the disadvantage of others (e.g. title and status for job applications).
- RPLC considered: whether the EIT designation could be linked to a licence type, but the idea did
 not gain traction at committee. RPLC also discussed applicability to Limited Licence (LL) holders
 and decided not to expand the scope of the policy proposal at this time as the circumstances and
 needs of LL holders are significantly different than what an EIT program would address.

Recommendation

The "EIT as a Pre-Requisite" option appears to be less workable as an option than the "EIT as a Pathway" option. The drawbacks of this option include the multiple categories of prospective licensure applicants that would necessarily be exempted from the requirement and the possibility of creating a disadvantage for some individuals (such as non-CEAB graduates) who would not receive the program benefits of title and status.

Further, a pre-requisite program would be a regulatory program that restricts access to the licence and is likely not justifiable under a risk-based approach based on the findings of the April 2024 policy impact analysis and at a time when "red tape reduction" is a strategic focus. This is especially the case as, unlike other mandatory internship programs such as medical residency or articling, the program would not confer any additional rights to practise to program participants vis-à-vis non-participants.

For these reasons, staff recommend that Council endorse the "EIT as a Pathway" option and direct the development of such a program.

Next Steps

Based on Council's decision regarding a policy direction for a revised EIT program, a detailed program proposal, including a cost analysis, further stakeholder consultation, and a high level implementation plan will be brought to RPLC in June for review. It is anticipated that the final program proposal will be brought to Council at its June meeting for approval and subsequent submission to the Ministry of the Attorney General. Given that the program would require changes to the *Professional Engineers Act*, the timeline following submission to the Ministry is uncertain, potentially 2-3 years.

Prepared By: Policy Staff

C-568-7.1 Appendix A

Engineering Intern (EIT) Program Options – March 2025

Principles and Values for an EIT Program as developed by Council in November 2024:

- Fair, including non-traditional, pathways to licensure
- Minimum eligibility requirements (e.g., academic qualifications)
- Win-win scenarios that benefit everyone involved
- Grounded in legal and ethical practice

- Clarity of the path to licensure; accessibility
- Continuous improvement
- Enhancement of public safety
- Demonstrating an ongoing effort to seek licensure
- Based on PEO's principles

Overview

Both options presented in the table below were developed based on research findings, including feedback received during consultation. Two program options are proposed: 1) EIT as a pathway to meeting the experiential requirements for licensure while demonstrating commitment to the profession, and 2) EIT as a prerequisite for licensure.

A conscious effort is made in this document to avoid using the terms "voluntary" and "mandatory," as the consultation revealed that these terms can be ambiguous.

The options have significant overlap; however, some program elements differ between the two as delineated below. Rationale and key considerations are provided under each element.

#	Program Type	EIT as a Pathway	EIT as a Pre-Requisite for Licensure
1	Description	 "EIT as a Pathway" means that the EIT program would be one path by which a participant can demonstrate commitment to the profession and meet the experiential requirement for licensure. It would be a structured program that supports participants in gaining relevant experience on their way to licensure. Registration in the program is elective; however, 	 "EIT as a Pre-Requisite for Licensure" means that all individuals seeking a P.Eng licence would be required to complete this program, with the following exceptions: Applicants who hold a licence in another Canadian jurisdiction International applicants who are ready/eligible to apply for licensure CEAB graduates who gained experience
		the program requirements would be required.	outside of Ontario

2 Title 8	& stration Type	 EIT as a Pathway The previous name would be used: EIT; Engineering Intern; Engineer in Training. 	 EIT as a Pre-Requisite The previous name would be used: EIT; Engineering Intern; Engineer in Training.
0		II need to account for the various pathways by which peop nd ensure that the program does not introduce an unfair ba	arrier to licensure or have a discriminatory impact on any
0	-	expressed a preference for a 'mandatory' program, meanir e EIT program is a required pre-licensure program (or even	
0	Council's Principles with a regulatory po	and Values for an EIT program move away from a complete urpose.	ely voluntary program and in the direction of a program
Ration	for licensure, or wh	• -	
			 CEAB graduates who gained their experience in Ontario before the new EIT program came into effect "EIT as a Pre-Requisite" works well for CEAB graduates who require experience to meet the experience requirement for licensure. Consider whether individuals who have sufficient experience to apply for licensure but wish to gain more experience and access EIT program benefits before applying should be permitted into the program.

Rationale/Considerations

Consultations held with current and former EITs in 2024 showed that the use of the title was perceived as the main value of the EIT program. This perception was confirmed by the focus groups, particularly employers. Thus, a protected title should be a part of any EIT program to enhance the value of the program.

As the *Professional Engineers Act* (the Act) confers title protection on those with "engineering intern" status, the Act would need to be amended to allow for title use and protection for either program option. Please see section 4 for further detail.

RPLC considered whether the EIT designation could be linked to a licence type, but the idea did not gain traction at committee.

If EIT remains a designation, we do not anticipate any issues with interprovincial transfers. An EIT in Ontario will be able to transfer to another Canadian jurisdiction, and vice versa.

		EIT as a Pathway	EIT as a Pre-Requisite
3	Regulatory/Public	Yes	Yes
	Interest Purpose		

Rationale/Considerations

Both these programs would have a regulatory/public interest purpose, which would help PEO fulfill its public interest mandate.

		EIT as a Pathway	EIT as a Pre-Requisite
4	Act or Regulation	Yes	Yes
	Changes		

Rationale/Considerations

Both programs would require changes to the *Professional Engineers Act* and the regulations.

Section 40 (3.2) of the Act establishes an offence where a person who is not an engineering intern under section 20.1 uses the term "engineering intern" or "stagiaire en ingénierie", "EIT" or "SI", or any other term that will lead to the belief that they are an engineering intern. Under section 20.1 of the Act, for someone to be accepted by the Registrar as an "engineering intern," they must make a request to become one at the time they apply for a licence.

Due to the requirement that a licensure application decision be made in six months (three months as of July 1st) under the *Fair Access to Regulated Professions and Compulsory Trades Act* regime, a program in which individuals are meant to gain experiential qualifications for licensure is untenable if they are to be considered "engineering interns" or if the associated titles are to be used as part of the program.

Given that title use is perceived by stakeholders as the main value of the EIT program, a revised pathway or a pre-requisite EIT program would require amendment to the Act (along with the regulation and bylaws).

The length of time it would take to change the Act is uncertain, potentially 2-3 years.

		EIT as a Pathway	EIT as a Pre-Requisite
5	Requirements for Program Entry	 Application fee (waive licensing application fee as an incentive to join the program) 	 Application fee (waive licensing application fee as an incentive to join the program)
		 Met academic requirements for P.Eng 	Met academic requirements for P.Eng
		Successful completion of the NPPE	Successful completion of the NPPE
		 Frontload good character requirement so that the full good character validation would not be required at the application for licensure stage (other than a disclosure if anything has changed). 	 Frontload good character requirement so that the full good character validation would not be required at the application for licensure stage (other than a disclosure if anything has changed).

Rationale/Considerations

Both program types would have the same requirements for program entry. Frontloading these requirements at the entry to EIT stage would speed up the processing of program participants' applications for licensure as verification/validation would not need to be done. This would be a benefit for both program participants and PEO.

The requirement to meet the academic criteria, along with frontloading the NPPE and good character requirements, will streamline the EIT and licensure application processes, especially if EIT is offered as a pre-requisite for licensure. If the academics, NPPE, and good character are reviewed and validated at the EIT application stage, the only remaining requirement to be validated at the licensing stage is the experience requirement. This is particularly valuable given the provincial government's pressure to expedite the licensing process across all regulated professions.

Having an EIT program application fee that counts toward the licensure application creates value for EIT participants which would be especially important if it was a "pathway" program. This continuity also offers a clear path and progression to licensure.

The academic requirement may create unfairness for non-CEAB grads because of the current confirmatory exam system if it delayed entry into an EIT program (and accessing its benefits). The confirmatory exam system is currently under review.

	EIT as a Pathway	EIT as a Pre-Requisite
6 Program Components	 Annual fee Annual check-in to track progression toward licensure based on milestones and provide appropriate support based on where a program participant is on their licensure journey. Declaration of work toward licensure (Y/N type questionnaire to maintain a touchpoint) Continued good character Structured support toward completion of competency requirements (an 'experiential curriculum' tied to the Competency-Based Assessment) Ethical conduct Duties/Expectations of employers Safe work and learning environment and fair labour practices 	 Annual fee Annual check-in to track progression toward licensure based on milestones and provide appropriate support based on where a program participant is on their licensure journey. Declaration of work toward licensure (Y/N type questionnaire to maintain a touchpoint) Continued good character Structured support toward completion of competency requirements (an 'experiential curriculum' tied to the Competency-Based Assessment) Ethical conduct Duties/Expectations of employers Safe work and learning environment and fair labour practices

Rationale/Considerations

Annual Fee

An annual fee would help fund the administration of the program, to help ensure that it has a meaningful structure and programming. Financial barriers and equitable access to the program should be considered when Council sets the fees.

Annual Check-In/Reporting

There would be an annual check-in that would be used to maintain a touchpoint with program participants and allow them to track progression toward licensure based on milestones. It would also allow for reporting such as 'good character,' to streamline the application for the

professional engineering licence. This is based on feedback from the vast majority of respondents across all stakeholder groups, who indicated that an annual check-in is essential for ensuring ongoing support and alignment with licensure requirements. The details will be determined at a later date.

Structure

Stakeholders indicated they wanted a program with structure that would support program participants on their journey to licensure. This structure should be closely connected to the requirements of the Competency-Based Assessment to support progression toward meeting the competencies.

Duties/Expectations

Both programs would impose duties on the EIT participant. One concern with the previous iteration of the voluntary EIT program was that it established rights for EIT participants but did not have responsibilities beyond the payment of an annual fee. Establishing minimum requirements will enhance the value of the program by demonstrating that EIT participants are subject to a certain standard. Ensuring the requirements are 'right touch' (i.e. as minimal as required to enhance value, to have a regulatory purpose, etc.) will ensure the duties of the EIT participant do not represent a barrier or a 'con' for program participation for the "pathway" option. Subjecting EIT participants to an ethical conduct duty is what is proposed for both program types.

Stakeholders shared concerns about EITs receiving proper support and oversight, given the vulnerable status they may have as EITs in workplaces. With this in mind, the program will incorporate expectations that employers provide a safe work and learning environment, and fair labour practices. Enforcement with respect to employers (and whether these can rise to the level of duties) would need to be explored.

		EIT as a Pathway	EIT as a Pre-Requisite
7	Program Length	 No minimum duration Maximum: Six years Extension would be available to ensure equitable access (e.g. parental leave, illness, disability) 	 No minimum duration Maximum: Six years Extension would be available to ensure equitable access (e.g. parental leave, illness, disability)

Rationale/Considerations

The main consideration driving program length is a desire to ensure that the EIT program supports progression toward licensure as a P.Eng, and that it is not used as an alternative to licensure as a P.Eng. This sentiment was shared nearly unanimously by participants across all stakeholder groups. As such, a maximum duration for the program is proposed to make it time-bound.

In determining the maximum length of the program, we considered tying it to time-based experience. However, given discussions across Canada, including in Ontario, about reducing or removing time-based requirements entirely and replacing them with Competency Based Assessment (CBA) alone, we decided to propose six years based on research showing it takes 3-4 years to successfully complete CBA and adding extra time to allow for flexibility, including for non-traditional career paths.

There is no minimum duration so as to avoid the imposition of barriers on CEAB graduates who have already completed 12 months in their program (as they are currently able to under PEO's time-based assessment system), as well as to avoid barriers for those with out-of-province engineering experience, and for non-CEAB graduates who have some experience.

Stakeholders wanted those with non-traditional paths into engineering to be able to benefit from an EIT program, and so flexibility was built into the design. Stakeholders also raised equity and ensuring fair access and treatment within the program for those who take breaks from their progression toward licensure to have children/be a caregiver or because of illness/disability.

		EIT as a Pathway	EIT as a Pre-Requisite
8	Regulatory Oversight and Accountabilities	 Administrative (i.e. can suspend or remove from program for non-payment of fee or failure to complete an annual check-in) 	 Administrative (i.e. can suspend or remove from program for non-payment of fee or failure to complete an annual check-in)
		 Accountability for EIT duties that would include a fair and legally defensible procedure (PEO's existing complaints and discipline process) including possible reinstatement following removal 	 Accountability for EIT duties that would include a fair and legally defensible procedure (PEO's existing complaints and discipline process) including possible reinstatement following removal

Rationale/Considerations

Stakeholders generally expressed a need for transparent regulatory oversight of those participating in the program, and the ability to hold program participants accountable where necessary for ethical breaches.

Many consultation participants expressed the view that the current complaints and discipline process should not apply to EITs, on the grounds that it is unfair to hold them to the same standard as P.Eng holders. To clarify, EIT accountability would be only with respect to the ethical and other standards established specifically for EIT participants. If EITs are subject to the existing complaints and discipline processes, they will not be held to the same standard as P.Eng licence holders. Instead, EITs will be held accountable only for breaches of duties that apply to them.

In other words, the primary distinction lies in the scope of accountabilities and duties assigned to EITs, rather than the process by which accountability is enforced. For example, an EIT would likely not be held accountable for an engineering error, as their work is conducted under the supervision of a P.Eng. In such cases, it is the professional engineer who has signed off on the work who would be held responsible. However, any complaint/report received about EIT would go through the existing complaints and discipline processes. This will ensure that EIT participants who face the possibility of sanctions for alleged breaches of EIT-specific requirements benefit from a procedurally fair process and decision-making by a specialized committee (i.e., Complaints Committee) and a tribunal (i.e., Discipline Committee) that are trained on relevant issues and the standards that apply specifically to EITs (and not P.Engs).

Other Canadian regulators who hold their EITs (or individuals holding a similar status in the context of non-engineering professions) accountable for misconduct or ethical violations rely on their established complaints and discipline processes.

		EIT as a Pathway	EIT as a Pre-Requisite
9	Benefits	EIT fee reduces licensure application fee.	EIT fee reduces licensure application fee.
		 Frontloading requirements results in a streamlined licensure process. 	 Frontloading requirements results in a streamlined licensure process.
		Use of a protected title.	Use of a protected title
		 Recognition of a certain level of competency in, and a professional commitment to, engineering. 	 Recognition of a certain level of competency in, and a professional commitment to, engineering.
		 Support to start and complete a CBA record (online program) – could include a review of milestones. 	 Support to start and complete a CBA record (online program) – could include a review of milestones.
		 Advisory services on ethical/professional questions. 	 Advisory services on ethical/professional questions.
		 Enrollment in the program likely enhances employability, career advancement, and earning potential. 	 Enrollment in the program likely enhances employability, career advancement, and earning potential.

- Expectations for employers who work with EIT (i.e. safe workplace and fair labour practices).
- Mentorship (this aspect is voluntary)
 - Structured program details will be determined at a later date.
 - Availability of an online portal with a roster of mentors and mentees, allowing for easy pairing based on shared professional interests, skills, and goals to ensure a meaningful, productive relationship.
 - Mentorship could be offered in conjunction with the Chapters
 - Must ensure equitable access to mentorship.
 - o Mentor differs from employment supervisor.
- Workshops on topics in engineering regulation.
- Insurance discounts and access to affinity programs.
- Chapter participation (voting privileges).
- Networking opportunities.

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Rationale/Considerations

"Value" is a word that has been heard often in the EIT program consultations. Value to the public, to the profession, to the program participant, as well as to other stakeholders such as employers and universities has been considered.

Public

A major value to the public of both program types is that they are transparent regulatory programs that support those who wish to practise professional engineering. They assist participants in achieving licensure, hold them to certain standards, and play a key role in the development of their professional identities.

Profession

Both program types would provide support to those seeking to join the profession and provide clear paths to licensure. Both would create a pool of qualified individuals from which practitioners could hire. The programs would also create mentorship opportunities, strengthening connections in the engineering community.

Program Participant

The value of the programs would be the title and status, as well as structured support on the path to licensure. For the "pathway" program, this value would need to be attractive enough to draw participants (especially given that there are requirements for entry into the program and to remain in the program). The pre-requisite program would require less apparent 'value' as it would be mandatory. Value also needs to be considered in terms of those who are CEAB graduates, those who are non-CEAB graduates, and those whose career trajectories have been non-traditional.

Employers

The value to employers is having a pool of qualified individuals who have met the engineering regulator's academic and other requirements and who are subject to a certain standard by the regulator. The existence of a structured program also helps reassure employers that the EIT program participant is on the right track to gaining the required competencies.

		EIT as a Pathway	EIT as a Pre-Requisite
10	Resources	 Significant and ongoing investment in outreach efforts to encourage participation and communicate the value of the program. Operational capacity: additional human resources would be required in the External Relations, Licensing, Regulatory Compliance, Customer Service, IT, and Communications departments. Other resources may be identified depending on the elements of the program. For example, additional human resources may be required, depending on what the mentorship element of the program looks like. IT investment: An online portal is needed to support the online portfolio and the mentorship program and facilitate annual check-in. 	 Significant communication resources and outreach will be needed before and during the launch. Once the program is implemented, there will be less need for promotion since participation is mandatory. Engagement efforts will primarily focus on education and communicating program elements. Operational capacity: additional human resources would be required in the External Relations, Licensing, Regulatory Compliance, Customer Service, IT, and Communications departments. Other resources may be identified depending on the elements of the program. For example, additional human resources may be

	required, depending on what the mentorship element of the program looks like. IT investment: An online portal is needed to support the online portfolio and the mentorship program and facilitate annual check-in.	
Rationale/Considerations		
A cost analysis will be conducted once Council decides on a program direction.		
Other Considerations		
PEO will need to consider:		
How to deal with "legacy" EITs.		
 How the future EIT program fits in with potential changes to academic qualification (i.e. time-based requirement). 	ation (e.g., confirmatory exams, MRAs) and experiential	