



OMFC REGISTRATION REVIEW

**The Association of Professional Engineers and
Geoscientists of Manitoba**

Final Report (2012)

OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

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Introduction

This report presents the results of the Office of the Manitoba Fairness Commissioner's (OMFC) registration review with the Association of Professional Engineers and Geoscientists of Manitoba (Association or APEGM) as of July 2012.

Registration reviews are conducted as part of the Fairness Commissioner's mandate to review the registration practices of regulatory bodies subject to *The Fair Registration Practices in Regulated Professions Act (Act)*.

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations to improve compliance. Two senses of compliance are at work in the legislation. First and foremost, it refers to the fairness of assessment and registration practice, with particular attention drawn to the need for the fair consideration of internationally educated applicants. Secondly, it refers to the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that a registration review for any given regulator is to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

The OMFC's review process culminates in a Final Registration Review Report, complete with an Action Plan from the regulator. This report is a public document submitted to the Province's Minister of Immigration and Multiculturalism and posted on the OMFC's website.

Final Registration Review Reports are comprised of the OMFC's Findings Report for the regulator, which details the results of the registration review, the Action Plan submitted by the regulator to address any issues raised by the Fairness Commissioner's recommendations and a compliance statement from the Fairness Commissioner.

This report, then, presents the OMFC's May 2012 Findings Report for the Association of Professional Engineers and Geoscientists of Manitoba together with the Association's June 2012 Action Plan.

The Association's Registration Review Process

In consultation with regulators, the OMFC introduced a registration review process, including documentation and compliance evaluation tools, in the fall of 2009. The multi-step, registration review process has several key phases: documenting and understanding, evaluating and hearing feedback, and developing and agreeing to an Action Plan to move things forward. The process is designed to support meaningful reviews that concretely identify fairness issues and lead to progressive change.

The Association's registration review began in November 2010 with the steps, activities and dates outlined in the chart below. The extended timelines of the review are due to the novel, evolving review process being implemented by the OMFC and do not reflect any concerns with the Association in the conduct of this review.

APEGM's Registration Review		
Step	Activity	Date
Process Documentation	<ul style="list-style-type: none"> • Research and review of APEGM's registration materials by OMFC • Meetings between OMFC and APEGM to complete the documentation of the assessment and registration process • Completed <i>Process Documentation Tool</i> 	<ul style="list-style-type: none"> • November 2010
Compliance Evaluation And Findings Report	<ul style="list-style-type: none"> • Analysis and compliance assessment by OMFC • Completed <i>Compliance Evaluation Tool</i> and Findings Report submitted to APEGM • Formal request to APEGM for an Action Plan 	<ul style="list-style-type: none"> • August 2011 • April 2012
Action Plan	<ul style="list-style-type: none"> • APEGM's Action Plan in response to the Fairness Commissioner's recommendations • The Action Plan forms the basis of APEGM's and OMFC's relationship moving forward 	<ul style="list-style-type: none"> • June 2012
Final Report	<ul style="list-style-type: none"> • Final Registration Review Report presented to APEGM • Registration Review Process Completed 	<ul style="list-style-type: none"> • July 2012

APEGM's Assessment and Registration Process

The Association operates under the authority of *The Engineering and Geoscientific Professions Act*, C.C.S.M. c. E120. All engineers and geoscientists practicing engineering or geoscience and using the Professional Engineer or Professional Geoscientist (P. Eng or P. Geo) designation in Manitoba must be registered with the Association. Engineering and geoscientific work can be practiced without registration with the Association, so far as this work occurs under the supervision of a P. Eng. or P. Geo and so far as the legal responsibility for this work is assumed by a P. Eng. or P. Geo.

Qualification, Application and Assessment

To qualify for registration as a P. Eng or P. Geo, applicants must have appropriate academic training, significant work experience and meet professionalism requirements. The Association's registration process involves two principal steps: establishing academic qualification and then meeting a work experience requirement.

Step One: Establishing Academic Qualification

Applicants must complete an Application for Registration and submit the following documents:

- original or notarized Engineering or Geoscience Bachelor degree (four year degrees) and/or graduate or related degrees
- certificates, original transcripts (sent directly from the University)
- syllabi
- engineering report (engineers only, if available)
- proof of English language proficiency
- resume
- assessment fee
- proof of identification

In the case of engineering applicants, the assessment of international degrees is based on the extensive data base of international engineering programs held by Engineers Canada. Academic programs are assessed in terms of their equivalency to the Canadian Standard as defined by Engineers Canada. For geoscientists, academic programs are assessed against syllabi developed by Geoscientists Canada in collaboration with provincial regulators. The vast majority of the Association's members are engineers; the latest 2011 membership numbers indicate 6025 Engineers and 302 Geoscientists.

For both professions, graduate and related degrees are assessed in house by the Academic Review Committee. International academic training is assessed as either confirmed equivalent to the Canadian standard, partially confirmed or not appropriate. In the case of partial confirmation, applicants are assigned up to six exams where they must demonstrate equivalence in two areas of the standard where the applicant identifies their expertise.

There are three types of exams assigned:

- basic exams which test for fundamental knowledge in geosciences and engineering
- discipline exams, which evaluate more advanced, specialized knowledge
- complementary exams, which focus on Canadian professional practice knowledge

Depending on the outcome of their assessment, internationally educated engineers and geoscientists (IEEGs) choose which particular exams they will challenge from an assigned number in each group of basic, discipline or complementary.

For IEEGs who are assigned exams, there are several options to meet the academic qualification:

- Exams (Canadian Engineering Qualification Board – CEQB examinations) - Applicants take CEQB national exams which are offered twice a year in Manitoba.
- Courses – Upon the Association’s approval, applicants can take courses at the University of Manitoba in lieu of exams. For any one assigned exam, 2 or 3 university courses are often required.
- University of Manitoba’s Internationally Educated Engineers Qualification Program (IEEQ) - 12-month gap training program that involves completing senior-level engineering courses in the applicant’s discipline and a paid co-op work experience. This option is for engineers only.
- Interview - Applicants with Engineering or Geoscience degrees who have over ten years of current and qualifying work experience have the option of being interviewed for the purpose of waiving some or all assigned exams.

After successful completion of any of the above, IEEGs are considered to be Academically Qualified.

Step Two: Establishing Work Experience Qualification

Upon academic qualification, the next step in the registration process is to apply to the Pre-registration Program to become a member-in-training (MIT). MIT is the umbrella term used to refer to either Engineers-in-Training or Geoscientists-in-Training (EIT or GIT). These individuals are academically qualified engineers and geoscientists allowed to practice under the supervision of a P. Eng or P. Geo, for the purpose of acquiring the work experience needed for full registration.

MIT applicants must submit an application, admission fee, annual membership dues for Engineer-in-Training (EIT) or Geoscientist-in-Training (GIT) and must successfully complete an ethics and jurisprudence exam, “ABCs”, (Acts, BY-Laws and Code of Ethics). ABCs is a no-fee, on-line, open book exam.

Upon acceptance into the program, the applicant, now a MIT must satisfy the following requirements:

- obtain 4 years of current (within 8 years) and acceptable engineering or geoscientific work experience, at least one year of which must be Canadian or Canadian-like experience
- obtain 48 hours of Professional Development (may have been completed abroad, before MIT application)
- obtain 48 hours of Volunteer Service (may have been completed abroad, before MIT application)
- successfully complete the national Professional Practice Exam - closed book, two hour exam, offered twice per year, \$140.00 fee

With respect to work experience, applicants are required to submit work experience reports for past posts and every 6 months for current employment activity, as well as arrange for confidential professional references. The Association provides a form with detailed criteria that need to be addressed in these reports.

Engineering and geosciences work experience is assessed primarily in terms of the knowledge and application of engineering or geoscientific principles and techniques involved. The Experience Review Committee is responsible for this assessment and will require additional work experience if the work experience is deemed insufficient.

Appeals

The Association has a two-step appeal process for applicants who contest assessment or registration decisions. A pre-appeal or informal appeal process, referred to as 'reconsideration', involves the Association reviewing requests to reconsider files on the basis of new information and other factors. Formal appeals are heard orally by independent counsel members, require a \$500.00 cash deposit, and include the provision of written reasons for appeal decisions.

Time and Cost

Time and cost associated with the process of registering as a Professional Engineer or Geoscientist range markedly. Depending on the qualifications and circumstances of the applicant, the process can take less than a year to a decade or more, when a return to study and extensive work experience is needed.

For fully qualified applicants, minimal costs would total \$965.00 for application, assessment, National Exam and registration fees, plus associated documentation fees.

Costs for applicants returning to study to meet academic qualification will be significantly higher. The Association's exams are \$300.00 each, with as many as six being required. Two or three, 3 credit-hour university courses per assigned exam is a costlier alternative. Fees for upwards of 18, 3 credit-hour courses at the University of Manitoba, without textbooks and other associated costs, alone can exceed \$5,000.

The IEEQ program has an estimated total cost of \$6000.00. Finally the interview option is \$500.00. There will be significant associated expenses incurred to go back to school. IEEGs have indicated to the OMFC estimated total costs ranging from several thousands of dollars too well into five figures.

Summary of Findings

The OMFC reviews regulatory practice systematically, following the Province's Qualifications Recognition Process Model. The assessment and registration process is analyzed from the perspective of the applicant, as a set of key steps on the journey from pre-migration through to labour market entry as a recognized professional.

Below is a summary of the OMFC's review findings for the Association. Further analysis and explanation for these points and the recommendations that follow can be found in the attached Compliance Evaluation Report.

The Association's compliance evaluation draws a picture of a regulator committed to the fair assessment and registration of IEEGs. The Association is commended for several best practice models; most notably the provision of a dedicated Assessment Officer for IEEGs, policies that support the recognition of international work experience and the opportunity for a pre-appeal, 'reconsideration' process. Two chief recommendations that emerge from this report involve the need for a more efficient strategy to recognize academic qualifications and a more complete, accurate and easy-to-navigate information package.

- Website information is extensive and for the most part complete and accurate. The registration and assessment process is described in detail, step-by-step, including many useful features for IEEGs. However, some aspects of the registration and assessment information are inaccurate, confusing and in need of clarification. Absence of a well organized landing page for IEEGs frustrates easy navigation of the material.
- Registration process can be initiated abroad and some orientation information is provided to help IEEGs plan and prepare; financial supports and other government supports are identified. IEEGs have little opportunity to self-assess and are not given a realistic picture of the true cost and time commitment involved.
- A dedicated Assessment Officer meets with every IEEG applicant and offers one-on-one assistance, providing information and support with applications. The Association's communication with applicants throughout the registration process is timely and systematic;
- Timelines for the assessment of applications are reasonable. Several measures have been adopted to improve timeliness that have resulted in much faster academic assessments and more efficient reporting and assessment of work experience.
- International academic credentials are assessed and recognized. Engineers Canada, a national body, provides a well-defined academic standard for engineering and has done extensive work accrediting Canadian programs and assessing programs internationally. The Washington Accord allows accredited engineering programs from 13 countries to be recognized as equivalent to the Canadian standard.

- Policy and criteria surrounding the application of the academic standard, specifically the number of exams assigned, have recently been reviewed and evolved to better ensure the relevance and necessity of the academic requirement.
- Exams used to confirm or demonstrate academic qualification are based on well-established syllabi by Engineers Canada and Geoscientists Canada. Information is provided about the content, format and grading for the exams, including provision of study lists and samples of past exam questions.
- A variety of options are available to satisfy the academic qualification: challenging exams, university coursework, the IEEQ bridging program and an interview option for those with extensive experience. The highly successful University of Manitoba's IEEQ bridging program provides academic training, professional orientation and a work placement opportunity for IEEGs.
- Meeting academic qualification through exams, university coursework or the IEEQ is arduous and a major cost and delay for IEEGs. The Association's interview option is much more efficient in this regard, but is restricted to those with at least 10 years of significant work experience.
- A dedicated strategy is in place to assess and recognize international work experience based on well-defined principles and criteria. The one year Canadian work experience requirement may be waived if the applicant has international experience in a Canadian environment.
- Provisional licensure is available for IEEGs that meet all of the required qualifications for full registration but who lack Canadian work experience.
- Written reasons accompany assessment results and applicants have the right to appeal registration decisions that deny registration or subject it to conditions. 'Reconsideration', an informal review process, promotes relational fairness and allows for more timely review before formal appeals.
- Reasonable measure is taken to ensure those responsible for assessments and appeals are appropriately qualified and trained. Protocols, training and support are provided to Academic Review Committee, the Experience Review Committee and interview panel members.
- The Association is not for profit. Registration and assessment fees are based on a cost-recovery model and appear reasonable.

Fairness Commissioner's Recommendations

As a result of the OMFC's registration review of the Association of Professional Engineers and Geoscientists of Manitoba and to improve compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends:

1. *That* the Association develop and implement more timely alternate assessment strategies to recognize academic qualifications for IEEGs from non-equivalent academic programs;
2. *That* the Association develop and implement an assessment strategy to recognize academic qualifications evident in professional work experience of IEEGs with less than ten years work experience;
3. *That* the Association explore strategies to provide greater support to IEEGs challenging exams;
4. *That* the Association review the national Professional Practice Exam with regard to the difficulties it poses for IEEGs;
5. *That* the Association give consideration to the development of a restricted scope of practice license;
6. *That* the Association review its volunteer service requirement;
7. *That* the Association review its policy regarding English language proficiency requirements and consider benchmarking its exams and/or reconsider the requirement of CLB level 8 in reading and writing as a requirement for challenging the exams;
8. *That* the Association remove or significantly reduce the \$500 deposit required for formal appeal, for those for whom this cost may be a barrier; in addition, *that* the Association provide information to explain the circumstances under which appellants may lose their deposit;
9. *That* the Association approach Engineers Canada to request a review of their academic credential assessment practice and to consider the possibility of allowing their data-base to be used to develop a tool that will allow IEEGs a better sense of how their academic qualifications will likely be assessed;

10. *That*, with respect to registration information,

- a dedicated web section for IEEGs on the Association’s website be introduced that provides information or links to information:
 - describing and explaining the practice of engineering and geosciences in Manitoba
 - indicating the documentation best collected pre-migration and the steps in the registration process that can be initiated abroad
 - detailing the English language proficiency requirement and language testing and upgrading opportunities
 - providing the steps involved in registration, including time and cost involved
 - providing information about available supports for IEEGs
 - indicating fee payment options and financial support opportunities
 - supporting navigation of the website and access to information regarding academic assessment and pre-registration
- information be introduced to better define the Association’s academic standard and the rationale behinds its application
- registration information be reviewed to ensure it is up-to-date
- information about the recognition of international work experience be clarified
- information be provided about the English language proficiency requirements and communication demands of the profession, and a clear policy be provided regarding the means by which applicants can demonstrate language proficiency, including approved language tests, scores, expiration dates, and/or if there are circumstances under which the language requirement may be waived
- more practical, concrete information be provided about the Association’s Code of Ethics and the ethical obligations of professional practice
- information be provided to clarify the possibility of IEEGs providing alternative documentation, with reasons, when they cannot provide the required documentation due to unalterable circumstances;
- academic assessment letters be required to make reference to the guidelines employed. Letters should also identify the Engineering Economics Exam where appropriate
- a more elaborate definition of the meaning of licensure be provided, one which gives better explanation of the possibility of non-licensed engineering and geoscientific work and which better explains what is involved when licensed engineers and geoscientists directly supervise and take legal responsibility for engineering and geoscientific work

11. *That* information be provided about the procedure for accessing records.

APEGM's Action Plan

In response to the Fairness Commissioner's Recommendations, the Association of Professional Engineers and Geoscientists of Manitoba proposed the following actions plans as of June 2012. This Action Plan is reprinted in its entirety below.

The Association's Action Plan will form the basis of its relationship with the OMFC moving forward.

1. That the Association develop and implement more timely alternate assessment strategies to recognize academic qualifications for IEEGs from non-equivalent academic programs;

Two (2) assessment methods are commonly used by Canadian jurisdictions to determine whether an applicant's education is equivalent to the Canadian standard set by the CEAB: (i) confirmatory exams and (ii) interviews. Manitoba has added two more options: (iii) courses in lieu of exams and (iv) the Internationally Educated Engineers Qualification program. A fifth option currently being tested in Alberta is the American "FE" or Fundamentals of Engineering exam. Although the FE exam seems like a good alternative method of testing equivalency, strict policies on the administration of the exam outside the USA by the National Council of Examiners for Engineering and Surveying may prove too onerous and expensive for Canadian regulators.

Compliance with *The Agreement on Internal Trade* and *The Mobility Act* make it extremely difficult for professional regulators to provide alternate assessment options. Common practice between jurisdictions ensures mobility, while differential practices aggravates the agreement. As a result, APEGM is currently discussing alternate options at the national level with the other provincial regulators of engineering and geoscience to ensure mobility and compliance with AIT.

Expected timeline: No proposed timeline.

2. That the Association develop and implement an assessment strategy to recognize academic qualifications evident in professional work experience of IEEGs with less than ten years work experience;

The interview option works very well for applicants with significant experience. Of the interviews conducted by APEGM, it has been seen that some applicants do well, while others demonstrate an astonishing lack of understanding of their discipline. Often this is because they have been stuck in a construction management role. For example, some applicants from the Middle East have worked extremely hard in a management role, but demonstrate limited growth in professional engineering practice.

It is a complex and sensitive process to match interviewers with applicant profiles. Done carefully and accurately, the interview candidate has a good opportunity for a fair and successful interview. However, sometimes it is difficult to assemble a panel of interviewers with the matching professional practice background of the candidate. Applicants who interview poorly cause embarrassment to themselves and create extreme disappointment for the panel members. Interviewers often resign from

volunteer service in response to a bad interview.

One curious aspect about interviews is that many applicants want to proceed with them, but when asked what kind of time frame they would like – they ask for a time frame far into the future. For example, one person working in Dubai and another working in Afghanistan have requested interviews in 2014. This increases their years of work experience and confirms that many applicants are not in a hurry to sit for an interview. As a result, APEGM will explore the necessity and efficacy of reducing its interview cut-off below 10 years.

Expected timeline: 12-24 months.

3. That the Association explore strategies to provide greater support to IEEGs challenging exams;

The purpose of confirmatory exams is to confirm the knowledge that the applicant already possesses from their home country. APEGM provides information on available resources, past exams, text books and coaching. A recent support group for assessment applicants has been established by the APEGM Filipino Members Chapter. It is hoped that additional support groups can be added over time.

Expected timeline: 12-24 months.

4. That the Association review the national Professional Practice Exam with regard to the difficulties it poses for IEEGs;

The NPPE is a national standard and required by all engineering regulators across Canada. APEGM acknowledges that the NPPE poses a challenge to some applicants including IEEGs. Recently, APEGM has offered a successful NPPE preparatory seminar that covers material for the NPPE and includes strategies for writing and passing the exam. The instructor has been very good and well-received by the applicants. One improvement that will be added is a short session on 'how to write a bubble test.' APEGM has discovered that occasionally IEEGs have difficulty understanding this concept. Applicants who have taken the seminar appear to do better overall, than people who haven't. The instructor contacts participants after the exam to get their feedback and has provided assistance to those who have had difficulties. The NPPE pass rate for Manitoba is 91% and APEGM is confident the NPPE is only a problem for a few. APEGM will ask the NAOG (National Admissions Officials Group) to consider extending the NPPE exam to 3 hours from the present 2 hour time limit.

Expected timeline: 6 months.

5. That the Association give consideration to the development of a restricted scope of practice license;

The restricted scope of practice license or "limited license" as it is known across Canada is not a new concept. Ontario, Saskatchewan, Alberta and British Columbia have limited licenses with common features. One standard requirement of the limited license is that the applicant must be a non-engineer. Chemists, biologists, technologists and other scientists and technical applicants seeking to practice in a small, specified scope of engineering apply for a limited license. They become registered as "engineering licensees" separate and distinct from the professional engineer license category.

An IEEG who successfully completes the registration process would be granted a full license as a professional engineer and not seek a limited license. Unsuccessful applicants may register with another certifying body and apply for a limited license as a non-engineer. APEGM is presently researching the possibility of new legislation to establish a licensee category in Manitoba.

Expected timeline: 3-5 years.

6. That the Association review its volunteer service requirement;

APEGM has not found the volunteer service requirement to be a barrier for IEEGs. The requirement is to obtain 12 hours of voluntary service and this will be made clearer in the new web section. Most IEEGs enjoy participating in volunteer events because it develops their networking skills. Many do more than the minimum. APEGM will review the volunteer service component in the context of the new continuing professional development by-law affecting all members.

Expected timeline: 12 months.

7. That the Association review its policy regarding English language proficiency requirements and consider benchmarking its exams and/or reconsider the requirement of CLB level 8 in reading and writing as a requirement for challenging the exams;

APEGM advises all applicants that a minimum language proficiency of CLB Level 8 is recommended. Many applicants obtain a CLB grade level before applying for assessment. A specific engineering CLB test designed for engineering applicants is being developed. APEGM will consider changing its policy once this specific test is available.

Expected timeline: 6-12 months.

8. That the Association remove or significantly reduce the \$500 deposit required for formal appeal, for those for whom this cost may be a barrier; in addition, that the Association provide information to explain the circumstances under which appellants may lose their deposit;

To date, no one has been charged the appeal deposit of \$500. There are two opportunities for an applicant to receive a hearing prior to a formal appeal: (i) reconsideration and (ii) hearing before the Registration Committee. In some cases, more than one reconsideration is given. Should an applicant be denied registration by the Registration Committee, they have the right to an appeal to Council. Appeals to Council carry a deposit of \$500 which the council reserves the right to keep, but may elect to return to the appellant. Appeals to council are rare, but have occurred at considerable cost (ranging \$2,000 to \$5,000). Council has limited authority to collect costs from appellants. As a result, multiple reconsiderations prior to appeal and the deposit fee of \$500 will remain the practice and policy respectively.

9. That the Association approach Engineers Canada to request a review of their academic credential assessment practice and to consider the possibility of allowing their data-base to be used to develop a tool that will allow IEEGs a better sense of how their academic qualifications will likely be assessed;

APEGM will ask the foreign credential assessors of Engineers Canada to consider

publishing their database for wider use as a self-assessment tool by IEEGs.

Expected timeline: 6 months.

10. That, with respect to registration information, the Association provide:

- ***A dedicated web section for IEEGs.***

APEGM will undertake this change by December 31, 2012.

- ***Information be introduced to better define the Association's academic standard and the rationale behind its application.***

APEGM will add new information to the web section for IEEGs by December 31, 2012.

- ***Registration information be reviewed to ensure it is up-to-date***

APEGM will undertake this review by December 31, 2012.

- ***Information about the recognition of international work experience be clarified.***

APEGM will undertake this clarification in the web section for IEEGs by December 31, 2012.

- ***Information be provided about the English language proficiency requirements and communication demands of the profession.***

APEGM will undertake this change in the web section for IEEGs by December 31, 2012.

- ***More practical, concrete information be provided about the Association's Code of Ethics and the ethical obligations of professional practice.***

APEGM will add this information to the IEEG web section by December 31, 2012.

- ***Information be provided to clarify the possibility of IEEGs providing alternative documentation, with reasons, when they cannot provide the required documentation due to unalterable circumstances.***

The APEGM Academic Review Committee (ARC) will discuss this topic at its upcoming policy meeting. A draft policy allowing for alternative documentation will be presented. Once ratified, it will be included in the web section for IEEGs.

Expected timeline: 2 months.

- ***Academic assessment letters be required to make reference to the guidelines employed. Letters should also identify the Engineering Economics Exam where appropriate.***

APEGM is confident that assessment letters are accurate, detailed and provide complete information back to all applicants. Engineering Economics is identified where applicable. Only applicants not showing Engineering Economics on their transcript are assigned the exam.

Applicants referred to the IEEQ Program are required to take the course

over again as part of the UM Faculty of Engineering syllabus. Although this is a repeat for the applicant, it is an IEEQ/UM policy outside the control and authority of APEGM.

- ***A more elaborate definition of the meaning of licensure be provided, one which gives better explanation of the possibility of non-licensed engineering and geoscientific work and which better explains what is involved when licensed engineers and geoscientists directly supervise and take legal responsibility for engineering and geoscientific work.***

APEGM will add this information to the IEEG web section by December 31, 2012.

11. *That information be provided about the procedure for accessing records.*

APEGM provides a secured login area on its web site where assessment applicants can access their own file information. Restrictions prevent the viewing of some confidential documents, but the applicant can access and manage most of their own information. Accessing paper records requires assistance from an APEGM staff member. Information about the procedure for accessing records in person will be added to the IEEG web section by December 31, 2012.

Fairness Commissioner's Statement of Compliance

The Association of Professional Engineers and Geoscientists of Manitoba's Action Plan is for the most part a progressive response to the recommendations resulting from the OMFC registration review. These actions will support the fairer assessment and recognition of internationally educated engineers and are fully consistent with *The Fair Registration Practices in Regulated Professions Act*.

Many aspects of the Association's registration practice are commendable: a dedicated assessment officer for IEEGs; policies supporting the recognition of international work experience; the pre-appeal or reconsideration process. Special comment also needs to be directed to the participation of the Association in the development of the IEEQ program, a Provincial milestone for gap training. The Association's recent move to more relevant criterion for academic qualification, requiring that applicants show evidence of qualification in two areas of engineering expertise, now allows many more IEEGs a more realistic opportunity for licensure.

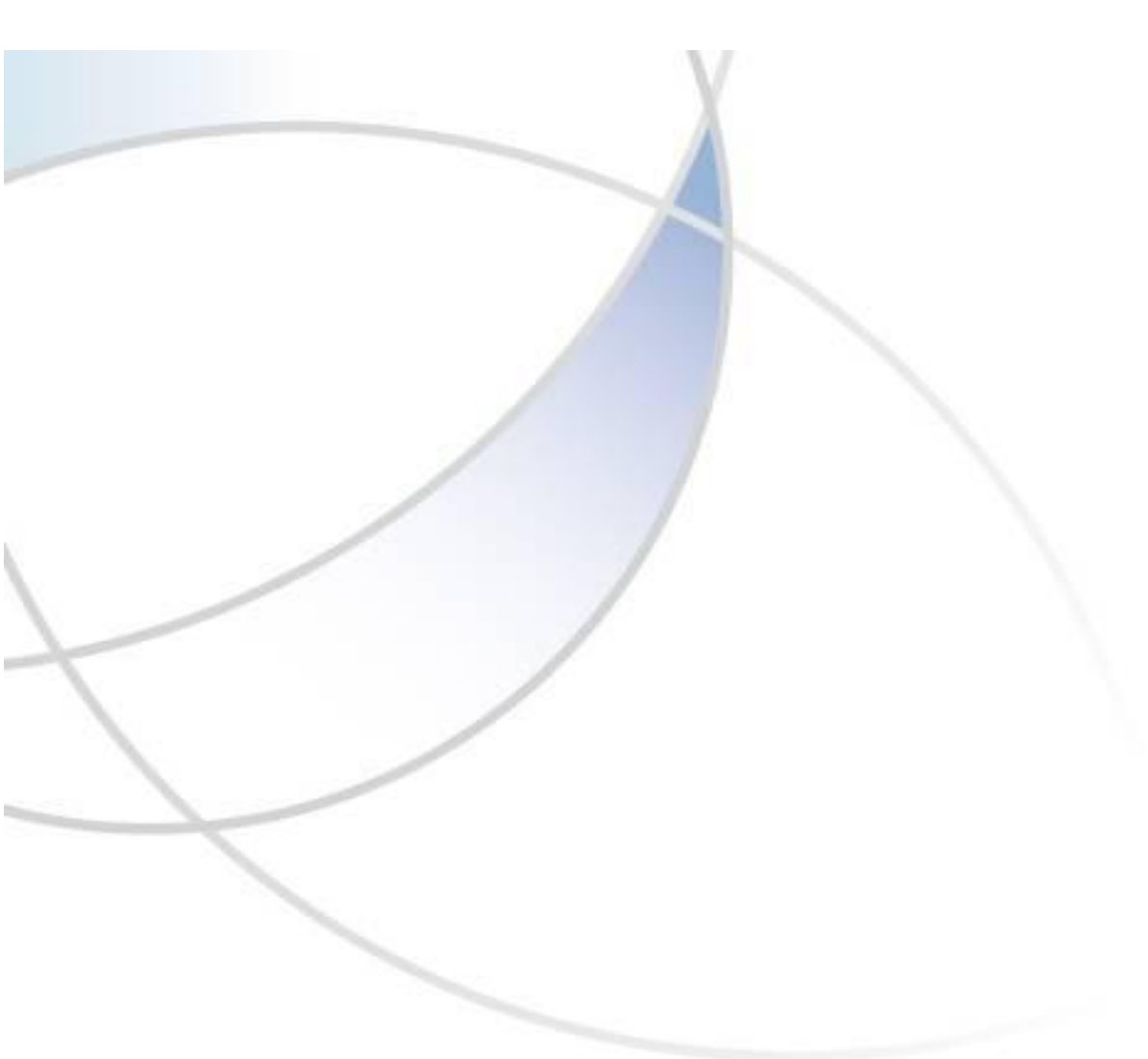
All of these measures affirm a "committed partner in maintaining fair registration practices in our province", to quote the Association's Action Plan. Graced with the engineer's ever-pragmatic, problem-solving sensibility, the Association has made real strides over the past decade evolving its practice to more effectively deal with the reality of increasing numbers of skilled immigrant colleagues in Manitoba.

The Association's Executive Director and staff have been responsible for many of these changes, some of which were decidedly hard fought. They continue to champion this evolution, are working with the OMFC on several projects and have generously shared their experience and best practices with other regulators.

In this context, I expected the Association to seriously address two significant recommendations that resulted from the registration review: to consider more timely alternative assessment strategies to recognize academic qualification and to reduce the 10-year work experience requirement needed for an interview. Even though I understand that academic training is a critical qualification in the professions, I fail to understand how subjecting mid-career professionals to academic exams or University courses to confirm academic qualification is an efficient and fair recognition strategy.

Although these recommendations pose a real challenge for the Association, I encourage the Association to avail itself of existing tools such as prior learning recognition strategies, and promising new tools like E-portfolios, that would support an alternative. OMFC would be open to supporting efforts in this regard.

We truly appreciate the Association's co-operation and openness during the conduct of the registration review and thank the Association's staff and management for their participation.



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