

2017 Registration Review Report

Engineers Geoscientists Manitoba



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Executive Summary

The 2017 Registration Review Report for Engineers Geoscientists Manitoba (Association) examines their state of progress with regard to the fair consideration of individuals educated outside of Canada. The Fairness Commissioner identifies progress opportunities and the Association responds with an action plan.

The Association's licensure practice for internationally educated engineers and geoscientists (IEEGs) is progressive. Most notable are the variety of options and pathways available for people to meet academic qualification in lieu of writing confirmatory exams – an interview, the University of Manitoba IEEQ Bridging program, university coursework, and most recently the U.S. based Fundamental in Engineering Exam. International professional work experience is assessed and credited toward meeting elements of the Association's internship program. IEEGs receive strong personal support and assistance and the level of procedural fairness throughout the assessment process is high.

Progress in this profession since the 2012 registration review is significant. The Association:

- Moved to recognize the U.S. based, National Council of Engineering Examiners Fundamentals in Engineering Exam (FE Exam) as an alternative to writing confirmatory exams.
- Introduced a 'Specified Scope of Practice License' that allows applicants with degrees related to engineering or geoscience or with experience that falls within the scope of engineering or geosciences a licensure opportunity.
- Improved its website registration material for IEAs and online document and application submission is now available.
- Introduced an alternative documentation policy.

The Fairness Commissioner sees two progress opportunities: allowing qualified IEEGs to demonstrate academic qualification under supervision as a further alternative to confirmatory exams and to continue to work on IEEG registration data collection to improve our understanding of IEEG licensure.

In response to the progress opportunities identified by the Fairness Commissioner, the Association declined to take action or consider the use of intern practice for the purpose of confirming academic qualification and will attempt to provide basic registration data annually to the OMFC.

The Fairness Commissioner is disappointed with the Association's response to the progress opportunities and draws attention to the reality of low IEEG licensure outcomes that call for more work even in an otherwise progressive profession.

Introduction

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 for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are 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 2017 Registration Review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

In this report, Engineers Geoscientists Manitoba's assessment and registration practice is evaluated in terms of its overall state of fair practice and for the purpose of identifying progress opportunities. This includes an analysis of Engineers Geoscientists Manitoba's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

This report is a public document and will be posted on the OMFC's website and submitted to the Minister of Education and Training.

Context of the Profession in Manitoba

Engineers and Geoscientists work in a diverse range of fields requiring scientific and technical expertise applying engineering and geoscience principles and safeguarding private and public interests.

The majority of Engineers and Geoscientists Manitoba's members are engineers; the latest 2016 membership numbers indicate 5,257 Engineers and 210 Geoscientists.

The engineering and geoscience professions are regulated in all provinces and territories across Canada. Engineers Geoscientists Manitoba recognizes the Agreement on Internal Trade that allows for mobility of engineers and geoscientists from one province to another.

While engineers and to a lesser extent, geoscientists, often have some form of licensure in different countries, Canada's system for licensure is unique in that four years of supervised and approved engineering or geoscience experience is required after graduation from an engineering or earth sciences degree. Licensure as a P.Eng. or a P.Geo. confers both right-to-title and practice and is needed for unsupervised practice and the ability to take legal responsibility for engineering or geoscience work.

Many countries use different systems to designate engineers and geoscientists. For example, in South American countries there is the 'Titulo de Ingeniero' which has both an experience and academic component, while in many of the English commonwealth countries such as Australia and the United Kingdom, there is the concept of a 'Chartered Engineer', which is a designation granted only after many years of high level discipline-specific experience. In the United States, the Professional Engineer (PE) is distinguished from a P.Eng. with an 'industrial exemption' for those engineers working in Industry.

Internationally trained engineers contribute significantly to the labour market and often bring unique skills to the table. Engineers Geoscientists Manitoba has endeavored to encourage newcomers by encouraging the creation of ethnic specific chapters such as the Philippine Members Chapter, the Chinese Members Chapter, the Indian Members Chapter and recently, the Arab Members Chapter. One of the purposes of these chapters is to allow those engineers who have gone through registration in Canada to assist others from their countries of origin to integrate into the profession and Canadian society.

Overview of Assessment and Registration Process

Engineers Geoscientists Manitoba (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 Engineers Geoscientists Manitoba. Engineering and geoscientific work can be practiced without registration with the Engineers Geoscientists Manitoba, as long as this work occurs under the supervision of a P.Eng. or P.Geo. and as long 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 establishing academic qualification, meeting work experience requirements and passing the national Professional Practice Exam.

Step 1: Establishing Academic Qualification

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

- World Education Services (WES) International Credential Evaluation Package (iCAP) document-by-document credential evaluation. The applicant must pay a \$150 fee and arrange the direct submission of academic degrees and transcripts from the applicant's academic program(s) to WES.
- if available, engineering report or thesis (engineers only)
- proof of English language proficiency
- resume
- assessment fee
- proof of identification

In the case of engineering applicants, the assessment of international degrees is conducted by the Association 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. For both professions, graduate and related degrees are assessed by the Association's 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 confirmatory exams assigned:

- basic exams which test for fundamental knowledge in geosciences and engineering
- discipline specific 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 write from an assigned number in each group of basic, discipline specific or complementary exams.

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

- Canadian Engineering Qualification Board (CEQB) Exams – Applicants take CEQB national exams which are offered twice a year in Manitoba.
- University Courses – Upon the Engineers Geoscientists Manitoba’s approval, applicants can take courses at the University of Manitoba in lieu of exams. For any one assigned exam, two or three university courses are required.
- University of Manitoba’s Internationally Educated Engineers Qualification Program (IEEQ) – 12 to 24 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 can request to be interviewed for the purpose of waiving some or all assigned exams.
- Master’s or PhD – Applicants successfully complete a Post-graduate Engineering Degree at a CEAB accredited institution.
- Fundamentals of Engineering (FE Exam) – This is a new option which has been offered since August 2015 and is available for engineering applicants only. IEEGs with six or fewer exams assigned by Engineers Geoscientists Manitoba, may write the U.S. based FE Exam as an alternative to writing separate confirmatory exams. The exam can be written in Winnipeg.

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

Step Two: Establishing Work Experience Qualification

The next step in the registration process is for IEEGs to have their professional work experience assessed. IEEGs can be credited with fully meeting the Association's professional experience requirement if they have four years of qualifying experience with one year occurring in a supervised Canadian environment.

IEEGs with four years of qualifying experience, but who do not possess Canadian-like experience, qualify for Provisional Registration and will need to complete one year of work experience under supervision of a registered member.

IEEGs with less than four years of qualifying professional experience apply to the Pre-registration Program to become an Engineering Intern (EIT) or Geoscience Intern (GIT). IEEGs practice as Interns under the supervision of a P.Eng. or P.Geo. for one to four years.

Intern applicants must submit an application, admission fee and annual membership dues for Engineering Intern (EIT) or Geoscience Intern (GIT).

With respect to documenting work experience, IEEGs submit work experience reports for past posts and every six 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 geoscience work experience is assessed primarily in terms of the knowledge and application of engineering or geoscience principles and techniques involved. The Association's Experience Review Committee assesses work experience and may request additional work experience if it is deemed necessary.

At this point in the process all IEEGs must successfully complete:

- the Act, Bylaws and Code of Ethics test (ABC test). The ABC test is offered online and there is no fee
- obtain 12 hours of Professional Development
- obtain 12 hours of Volunteer Service

Step Three: National Exam

Applicants must successfully write the national Professional Practice Exam. The exam can be undertaken any time subsequent to being deemed academically qualified or anytime during internship or provisional registration and must be passed to qualify for full registration.

The Professional Practice Exam tests for knowledge of professionalism, law and ethics. The online, multiple-choice format test is offered twice annually at authorized test centres. It currently costs \$260.

Step Four: Full Registration

To be registered, applicants submit a professional reference and pay a \$390 registration fee. This fee represents professional dues and is pro-rated for the month in which the applicant is registered, declining each month until the end of the year.

Appeals and Reconsiderations

The Association has a two-step 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 or other extenuating factors. Formal appeals are heard orally by independent counsel members, require a \$500 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 upwards of a decade, when a return to study and/or several years of work experience are needed.

For fully qualified applicants, those not requiring exams or internship, minimal costs would total approximately \$1,600 for WES iCAP credential assessment, the Association's academic and pre-registration assessments, Professional Practice Exam and registration fees.

Costs for applicants returning to study to meet academic qualification will be higher. The Association offers numerous pathways to qualification that vary significantly in cost.

The Association's exams are \$300 each, with as many as six potentially required. Undertaking university coursework, depending on the number of courses required, will have tuition fee costs that may approach \$5,000. The IEEQ Program has an estimated total cost of \$6,000. For permanent residents, tuition fees for a Master's program at the University of Manitoba are just over \$5,000.

Two of the more cost effective pathways include the \$500 interview option, although some exams may still be assigned, and the Fundamentals of Engineering Exam currently at \$225 USD.

State of Progress

Engineers Geoscientists Manitoba (Association) continues to demonstrate a commitment to the fair assessment and recognition of internationally educated engineers and geoscientists (IEEGs).

Timely, cost-effective entry into practice is possible for IEEGs with academic credentials recognized through mutual recognition agreements and accords and for those with extensive qualifying professional experience. An impressive variety of pathways to licensure are possible.

The Association's licensure process for IEEGs has many progressive features. Notable practices and policies include:

- In 2008, the Association moved to more relevant assessment policies for academic qualification. Academic qualification is now confirmed in two areas of discipline to better reflect what is needed in the field. As a result, IEEGs with undergraduate degrees in engineering or geoscience are normally assigned no more than six exams. Previously, people had to confirm their academic training was equivalent to a Canadian engineering program and the assignment of a dozen or more exams was not uncommon. The assessment process was also streamlined and graduate and related scientific degrees are now given consideration.
- Assessment of academic qualification is based on post-secondary academic programs or university degrees without screening for secondary education attainment. This policy allows fair consideration for IEEGs with professional engineering and geoscience degrees, but from areas in the world that may not have the same length of secondary education.
- Policies are in place for the assessment and recognition of international professional experience.
- For applicants with 10 years of current and high level professional experience, an interview option may be available as an alternative to completing confirmatory exams.
- In partnership with the University of Manitoba's Faculty of Engineering, the Association supported the development of the Internationally Educated Engineers Qualification Program (IEEQ Program). The IEEQ Program provides a gap training opportunity for internationally educated engineers with discipline-specific academic coursework, professional orientation and a paid co-op work experience. The program connects students with future professional employment opportunities.

- The Association has a dedicated staff person to provide support and assistance for IEEGs and a progressive ‘Reconsideration’ review process to help ensure relational fairness for IEEGs.
- Many internationally educated engineers benefit from licensure from the Certified Technicians and Technologists of Manitoba as they pursue licensure, or as an alternative to licensure, with the Association. These regulatory bodies have a history of working well together supporting internationally educated applicants. Joint professional orientation sessions and applicant referrals are provided.
- The Association’s assessment practice benefits from the work of Engineers Canada. Its work establishing mutual recognition agreements with various international jurisdictions supports the Association’s ability to recognize academic qualification.

The Association has taken steps further improving its practice since its 2012 Registration Review. The Association:

- Moved to recognize the U.S. based, National Council of Engineering Examiners Fundamentals in Engineering Exam (FE Exam). Applicants with six or fewer confirmatory exams assigned by the Association may write the FE Exam as an alternative. Those who have successfully written the FE Exam prior to application are considered academically qualified.
- Introduced a ‘Specified Scope of Practice License’. Practitioners are granted the title *Engineering Licensee* (Eng.L), or *Geoscience Licensee* (Geo.L). This allows applicants with degrees related to engineering or geoscience or with experience that falls within the scope of engineering or geosciences a licensure opportunity.
- Introduced an alternative documentation policy. Applicants that cannot, with good reason, provide documentation must provide a written explanation with a signed affidavit. Upon the Association’s review and approval, alternative documentation applicants are assigned eight confirmatory exams.
- Revised and improved the website and registration material for IEEGs. Licensure process is presented step-by-step, with helpful links to third parties. Information about access to records as well as immigration and financial support opportunities are provided.
- Supported the creation of ethnic-specific chapters for the Association’s registered members. These groups help IEEGs with exam preparation and integration into the profession and community.
- Implemented online document and application submittal to facilitate applications from abroad.

Engineers Canada has also recently revised and improved its website. Internationally educated engineers benefit from a helpful overview of the licensure process in Canada, information about engineering employment across the country and a no-fee, academic program assessment tool.

With these progressive strengths and continued improvements, the Association has improved licensure opportunities for a number of its IEEG applicants. Procedural fairness is strong and substantively, more IEEGs have a timely licensure opportunity. With almost half of the Association's applicants now internationally educated (49 per cent in the 2011-2015 period), the positive impact for this group and Manitoba's engineering community is significant.

Substantive Progress Opportunity

Recognizing the Association's progress and solid track record making real strides improving IEEG licensure practice, further progress may be possible and revolves around the need for more ***timely alternative assessment strategies to recognize academic qualification***.

For many IEEGs the process to achieve academic qualification is not particularly timely or effective. For mid-career professionals writing confirmatory exams or undertaking university coursework is onerous and may not maximize success rates. Exams and university coursework represent an extensive study commitment that can take IEEGs several years to complete.

We note the assignment of confirmatory exams is not necessarily a reflection of the quality and level of the applicant's academic training, nor required on the basis of evidence of lack of academic qualification, but rather on the grounds that the Association knows little about those applicants academic programs and needs to confirm qualification.

The Association's leadership work implementing alternative assessment pathways to academic qualification is commendable. The use of mutual recognition agreements and accords, the IEEQ Program, recognizing foreign regulatory exams and the interview option for engineers with extensive professional experience are all progressive, best-practice options.

However reality remains that a large number of IEEG applicants are not eligible under recognition agreements, do not qualify for an interview and cannot easily pursue a return to study or the university options. For this group, the question is whether additional pathways are feasible in a way that fully supports the Association's qualification standards.

Fair Practice Analysis

The Fairness Commissioner has identified the need for timely and effective registration, the recognition of qualifications acquired through professional work experience and the need for supervised practice opportunities as key substantive issues critical to realize progress among Manitoba regulators.

Following the Manitoba Fairness Standard, the Fairness Commissioner has the following commendations, comments and concerns about Engineers Geoscientists Manitoba's (Association) state of progress concerning these key fairness issues:

Timely Registration

The assessment and registration process is structured efficiently (Manitoba Fairness Standard, 7.1).

The Association's licensure process is straightforward and structured efficiently. Key features include:

- Multiple licensure pathways are available in lieu of confirmatory exams – interview, coursework, IEEQ Program.
- Move to recognize the U.S. based FE Exam creates another opportunity to confirm academic qualification.
- The Association's Specified Scope of Practice License allows IEEGs with non-traditional academic backgrounds but who may have professional, engineer or geoscience level qualifications in a specific discipline a new licensure opportunity.
- Practice under conditional registration as an intern or provisional member is possible. The national Professional Practice Exam can be completed during or toward the end of the applicant's internship, after they are exposed to Canadian professional practice.
- The National Professional Practice Exam is now offered more often. Currently there are three sittings a year, with the intention to have more sittings going forward.
- Employment in the individual's field is also possible prior to intern or provisional registration if the engineering or geosciences activity occurs under the direct supervision of a registered member and the member assumes legal responsibility for the work.

These aspects of the Association's licensure process support timely entry to practice.

The assessment and registration process is periodically reviewed to ensure timeliness for internationally educated applicants (Manitoba Fairness Standard, 7.2).

The Association's assessment and registration process is subject to regular review. The Association has a long history of progress regarding its assessment practice for IEEGs.

Recent examples include the 2016 amendment to the Association's legislation to introduce titles for a Specified Scope of Practice License and its move in 2015 to recognize the FE Exam.

Engineers Canada is also very active supporting provincial bodies developing academic standards, assessment and licensure resources. An extensive list of accords and reciprocity agreements are in place. Work developing assessment guidelines for provincial regulators has been significant, including recent activity developing competency assessment guidelines.

Communication with applicants is timely and systematic (Manitoba Fairness Standard, 7.3).

The Association's communication with applicants throughout the licensure process is timely and systematic. A dedicated staff person provides one-on-one personal support and assistance. The Association's practice in this area is commendable.

The registration process is such that qualified internationally educated applicants have an opportunity to practice in some capacity within a year of application (Manitoba Fairness Standard, 7.4).

The Association's assessment and registration process meets this standard for a group of its qualified applicants.

Applicants deemed academically eligible upon initial application as a result of either qualifying under reciprocity agreements and accords, or having earlier completed the U.S. based, Fundamentals in Engineering Exam have a timely licensure opportunity. Timeline into full registration or conditional registration as an intern or provisionally licensed may take three to five months.

Applicants with extensive qualifying professional experience may qualify for internship or provisional registration by successfully completing an interview. Timelines for interviews are dependent of the ability of the Association to arrange an appropriate interview panel and can vary.

Applicants that complete the IEEQ Program will need 12 to 24 months to complete the program in addition to a few months the Association requires for initial assessment of academic qualification and then its assessment of professional experience.

Applicants that complete confirmatory exams can take several years to achieve academic qualification. The Association allows applicants one year for every confirmatory exam assigned (extensions are possible) and recommends applicants undertake two every six months. Many IEEGs are assigned five to six exams and need several years to complete.

Academic coursework is also a possibility. Typically two courses are required for each confirmatory exam assigned. Depending on the circumstances of the applicant and the timing of the course offerings at the university, coursework can take several years to complete.

Recognition of Professional Work Experience

Professional work experience is considered to determine qualification (Manitoba Fairness Standard, 5.10).

The Association considers professional work experience both for the purpose of determining academic qualification and for the purpose of reducing or waiving its four year intern work experience requirement. This is progressive practice.

With regard to academic qualification, applicants with at least 10 years of professional experience can qualify for an interview in lieu of completing confirmatory exams. Interviews are dependent on the ability of the Association to arrange members with the appropriate expertise to participate. Successful applicants can have some or all of their confirmatory exams waived.

Regulator has objective standards and criteria to assess knowledge and competencies acquired through work experience (Manitoba Fairness Standard, 5.11).

The Association has developed standards and criteria to assess work experience both for its intern programs as well for the assessment of internationally professional experience.

With regard to the Association's intern program, policies, assessment criteria, procedures and a professional membership aware of their obligations supervising and mentoring neophyte members are well established; highly commendable.

Engineers Canada developed and is currently testing a competency assessment framework that helps support a fair, objective assessment of professional experience.

If Canadian work experience is a mandatory requirement, it is clearly justified (Manitoba Fairness Standard, 5.12).

Strictly speaking, in this profession there is no mandatory Canadian work experience requirement.

To qualify for registration as a professional engineer or geoscientist, IEEGs must possess four years of qualifying professional experience where at least one year of which is completed in a 'Canadian Environment'.

Although Canadian environment or Canadian-like professional experience is mandatory, it is possible for international experience to satisfy this requirement.

The OMFC understands many IEEGs with four or more years of international professional experience will still be required by the Association to complete one year of professional practice in Canada.

A provisional licensure designation, as opposed to the intern designation, is offered to these IEEGs who are otherwise fully qualified engineers or geoscientists, but for a lack of Canadian experience. This is progressive practice.

For IEEGs with four years of international professional experience and where at least one year of which has occurred in a Canadian-like environment, the Association will not require any practice under supervision as an intern or provisional member. This is progressive practice.

Supervised Practice Opportunities

Supervised practice opportunities are available for the purpose of assessment and gap training (Manitoba Fairness Standard, 5.13).

The Association's intern registration as either a geoscientist or engineering intern in training – 'GIT' or 'EIT' title designations – allows applicants an opportunity for timely entry into practice and a path to full designation upon meeting the requisite professional work experience with positive assessments and references from employers.

Given the challenges many mid-career IEEGs face confirming academic qualification perhaps the Association could give consideration to using its intern program for the purpose of allowing applicants an opportunity to show academic qualification while working under supervision in the field. Qualified IEEGs that can secure employment in roles where they demonstrate competence could be assessed by employers in coordination with the Association's Experience Review Committee. Successful applicants could have confirmatory exams waived, in whole or in part, based on the technical, academic competence demonstrated in the field.

Additional Fairness Concerns

Required qualifications are relevant and necessary for competent professional practice (Manitoba Fairness Standard, 3).

As indicated in the Association's 2012 registration review, requiring IEEGs to fulfil 12 hours of volunteer work to be registered does not seem relevant or necessary for competent professional practice. The requirement can be awkward for newly immigrated IEEGs to complete.

Applicants are provided clear, complete, accurate and easy to find information about: qualification requirements (Manitoba Fairness Standard, 1.4).

We see two items of concern:

1. Information about the Association's language proficiency requirement is for the most part accurate and complete. However, the OMFC understands applicants may have the requirement to provide a language test waived if they communicate well with staff in the application process.

The possibility of waiving the requirement in this circumstance is not explained in the registration information. This is needed to avoid applicants going to the trouble and expense of language testing in circumstances where it could have been avoided had they met with the Association's staff first.

In addition, the Association will accept the Canadian Level Benchmark Placement Test (CLBPT), which is commendable. These tests will be attractive to many IEEGs because there is no fee involved. However, this testing will only be conducted for the purpose of determining the appropriate language training course for an individual. This information would be helpful.

The Association recognizes the need to clarify its registration information surrounding its language proficiency requirement and over the course of this review has done so.

2. The Association's registration information about its work experience requirement for IEEGs is somewhat confusing. The Manual of Admissions states that "One year" of acceptable work experience "must be obtained in Canada (preferred) or the United States" (p.24). Elsewhere, in its website under 'Pre-registration' 'Work Experience', we see the statement "At least one year of work experience obtained in Canada. On a case-by-case basis experience earned in a Canadian company overseas could be considered." The Association's 'Academic Assessment Application Form' stipulates "Membership requires one year of work experience in Canada".

Information provided on Engineers Canada's website comparing provincial requirements suggests a third thing...for Manitoba, professional work experience involves "1 year in a Canadian Environment".

The Association recognizes the inconsistencies and is committed to clearing up the information.

Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding Engineers Geoscientists Manitoba's assessment and registration practice:

1. Allowing mid-career IEEGs to demonstrate academic qualification under supervision in practice could provide a timely, effective licensure pathway.
2. Engineers Geoscientists Manitoba's continued commitment and work with OMFC on data collection will help improve our understanding of licensure timelines and outcomes.

Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that Engineers and Geoscientists Manitoba take action regarding these progress opportunities.

Engineers Geoscientists Manitoba – Action Plan

In response to the Fairness Commissioner’s recommendation, Engineers Geoscientists Manitoba proposed the following Action Plan as of June 14, 2017.

Engineers Geoscientists Manitoba’s Action Plan will form the basis of its relationship with the OMFC moving forward. Follow-up meetings will be held annually after the 2017 Registration Review to discuss implementation of activities and updates to the Action Plan. Action Plan updates will be posted on the OMFC’s website on an annual basis, following these meetings allowing any interested party to see the progress to date.

Progress Opportunity	Action(s)	Completion Date
<p>1. Allowing mid-career IEEGs to demonstrate academic qualification under supervision in practice could provide a timely, effective licensure pathway.</p>	<p>Verification of knowledge and supervised practice is happening concurrently (albeit informally) already. However, the two two-step process cannot be combined as the assessment of academic credentials must be done by an informed, trained and knowledgeable reviewer. This cannot be done by an employer/supervisor as they are not informed, trained and knowledgeable, but more importantly because it forces them into a conflict of interest (to speed up the verification for the sake of employment)</p> <p>Academic qualification is not a skill or competency to be witnessed in the workplace, but a detailed comparison of a degree to see if it meets the acceptable standard for Manitoba.</p>	<p>n/a</p>
<p>2. Engineers Geoscientists Manitoba’s continued commitment and work with OMFC on data collection will help improve our understanding of licensure timelines and outcomes.</p>	<p>Engineers Geoscientists Manitoba will attempt to provide basic data; reporting on applicants once per year.</p>	<p>This seems to be an ongoing request that has no completion or finish date.</p>

Action Plan Comments

Engineers Geoscientists Manitoba Comments

The two items presented by the OMFC do not appear to improve the ability of Engineers Geoscientists Manitoba to regulate in the public interest. Rather, they hinder the ability of Engineers Geoscientists Manitoba to process applicants.

The goal of Engineers Geoscientists Manitoba is to fulfill the four requirements of the Fair Registration Practices Act (to demonstrate "transparency, objectivity, impartiality and fairness" of registration policies). Providing data support to the OMFC appears ancillary to the requirements of the Fair Registration Practices Act and the Engineering and Geoscientific Professions Act. Providing data support externally forces Engineers Geoscientists Manitoba to suspend its mandate by deferring vital internal IT projects.

Engineers Geoscientists Manitoba requests that the OMFC provide a "declaration of compliance with the Act" and then allow the organization to focus on fulfilling its mandate for the public of Manitoba (uninterrupted for at least 12 months) prior to making new requests for data support.

Office of the Manitoba Fairness Commissioner Comment

All professions subject to *The Fair Registration Practices in Regulated Professions Act*, including Engineers Geoscientists Manitoba, are required to undertake review of their registration practices and report on the registration of internationally educated individuals. This is stipulated in the legislation under the 'Review of Registration Practices', sections 15(1) and 15(2d). We note, in our October 28, 2011, 'Letter of Understanding', Engineers Geoscientists Manitoba agreed to provide registration data as a matter of allowing the Fairness Commissioner to fulfil her obligations under the fairness legislation.

The purpose of this activity is not to hinder Engineers Geoscientists Manitoba's licensure process, but rather to gain a much needed, fact-based understanding of outcomes and timelines, and to review the licensure process with an eye to making improvements.

Statement of Compliance

The Engineers Geoscientists Manitoba's Action Plan is a disappointing response to the progress opportunities identified in this review.

Engineers Geoscientists Manitoba's unwillingness to seriously consider possibilities for further improvements to its licensure process fails a basic objective of my work and Engineers Geoscientists Manitoba's responsibility under *The Fair Registration Practices in Regulated Professions Act* to review licensure practice for internationally educated applicants and where possible, take steps to improve the process.

Engineers Geoscientists Manitoba is a progressive regulator with a remarkable history adopting innovative practices and alternative pathways for internationally educated applicants. Significant steps have been taken since our last review with Engineers Geoscientists Manitoba and are highlighted in this report.

However, the reality remains that many well-qualified internationally educated engineers still face a difficult path to confirm academic qualification. Further alternatives need consideration if we are to maximize the number of qualified people recognized.

The stakes are high in this prominent profession. On the order of half of Engineers Geoscientists Manitoba applicants are now internationally educated, but licensure outcomes are still very low.

This is a profession known for its problem solving prowess. I look forward to what they may come up with to address this challenge.



Ximena Munoz
Manitoba Fairness Commissioner

Appendix I: 2011-2015 Registration Data

Engineers Geoscientists Manitoba reports annually to OMFC on the registration of internationally educated engineers and geoscientists to Manitoba.

Engineers Geoscientists Manitoba received 1,870 applications from 2011-2015. Among these applications, 913 or 49% were internationally educated applicants (IEAs).

The top country of education was the Philippines representing 21% of IEAs. This was followed by India, Nigeria, Iran and then China.

With regard to IEA licensure outcomes, by the end of 2015:

- 9% obtained full registration
- 27% were provisionally registered as interns
- 59% were still in process, and;
- 5% had withdrawn or been refused.

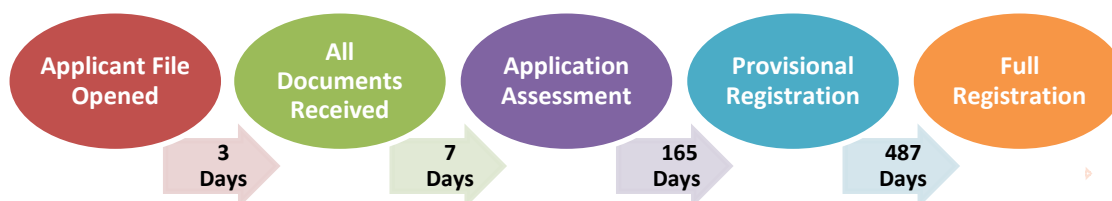
Registrations and Licensure Timelines

In the 2011 to 2015 period, Engineers Geoscientists Manitoba had 85 IEAs apply and successfully registered by the end of 2015. Just over two-thirds of this group, 69%, was deemed academically qualified upon application; the remaining 31% needed to complete confirmatory exams or one of Engineers Geoscientists Manitoba's accepted alternatives (academic coursework, bridging or interview).



Time to licensure -- from when an IEA's application documents were received by Engineers Geoscientists Manitoba to when full registration was obtained -- averaged 658 calendar days, or almost 22 months. For those who needed to complete confirmatory exams or the accepted alternatives, the average time was 28 months; for those deemed academically qualified upon application assessment, the average time was 20 months.

Average Process Time to Full Registration



The shortest licensure time was just over 8 months, while the longest process time was almost 4 years.

This analysis of 2011-2015 of Engineers Geoscientists Manitoba applicant registration data was provided by the Manitoba Bureau of Statistics.

For additional context, immigrant landings for engineers and geoscientists to Manitoba for 2011-2015 indicate:

Year	Landings
2011	131
2012	107
2013	146
2014	208
2015	195
Totals	787

The NOC codes associated with these landings are:

- 0211 - Engineering Managers
- 2113 - Geoscientists and oceanographers
- 2131 - Civil engineers
- 2132 - Mechanical engineers
- 2133 - Electrical and electronics engineers
- 2134 - Chemical engineers
- 2141 - Industrial and manufacturing engineers
- 2142 - Metallurgical and materials engineers
- 2143 - Mining engineers
- 2144 - Geological engineers
- 2145 - Petroleum engineers
- 2146 - Aerospace engineers
- 2147 - Computer engineers (except software engineers and designers)
- 2148 - Other professional engineers, n.e.c.

Source: Immigration, Refugees and Citizenship Canada. Prepared by Manitoba Education and Training.

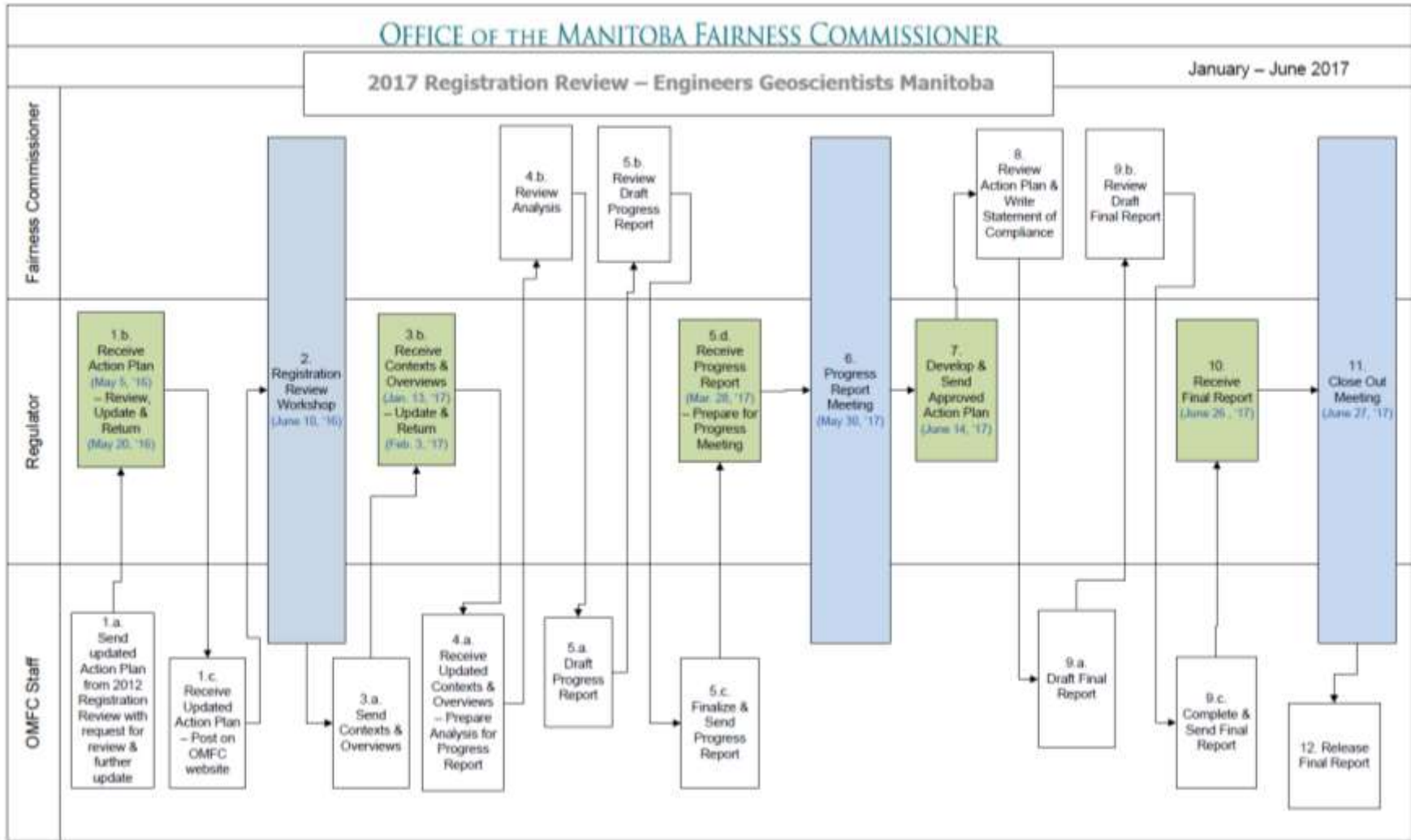
Appendix II: 2017 Registration Review Process

The OMFC's 2017 review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
Registration Review Workshop	<ul style="list-style-type: none"> • Group meeting between OMFC and regulators • Latest data and research presented • Fairness Standard, review focus and process presented • Review schedule provided 	June 10, 2016
Progress Report	<ul style="list-style-type: none"> • Report on Engineers Geoscientists Manitoba's fair practice progress • Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities • Progress opportunities identified • Recommendation from Fairness Commissioner to address progress opportunities 	March 28, 2017
Progress Meeting	<ul style="list-style-type: none"> • Engineers Geoscientists Manitoba and Fairness Commissioner discuss report and possible actions Engineers Geoscientists Manitoba is considering addressing progress opportunities 	May 30, 2017
Engineers Geoscientists Manitoba Action Plan	<ul style="list-style-type: none"> • Engineers Geoscientists Manitoba's Action Plan submitted to OMFC 	June 14 2017
2017 Registration Review Report	<ul style="list-style-type: none"> • Report submitted to Engineers Geoscientists Manitoba • Report contains the review findings, Engineers Geoscientists Manitoba's Action Plan, and the Fairness Commissioner's Compliance Statement 	June 26, 2017
Registration Review Closeout Meeting	<ul style="list-style-type: none"> • Engineers Geoscientists Manitoba and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how Engineers Geoscientists Manitoba's action plan will inform the relationship moving forward • Registration Review Report submitted to Minister of Education and Training and uploaded on OMFC website 	June 27, 2017

Review participants:

Grant Koropatnick, Executive Director and Registrar, Engineers Geoscientists Manitoba
 Sharon Sankar, Director of Admissions, Engineers Geoscientists Manitoba





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