



Entry to Practice Review

**A REPORT OF THE
ONTARIO PROFESSIONAL FORESTERS COUNCIL
TO THE
OFFICE OF THE FAIRNESS COMMISSIONER OF ONTARIO**

FEBRUARY 2011

OPFA Entry to Practices Reviews 2010-11

Executive summary

Objectives and Scope

This report covers mandatory Entry to Practice Reviews (Review) of three areas, required by the OFC (Office of the Fairness Commissioner) of all regulators of Professions¹:

- a) The necessity and relevance of the requirements for practical training and/or work experience;
- b) The efficiency and timeliness of decision making, including any practicum, mentorship, including decisions related to assessment, registration, and appeals;
- c) The reasonableness of Fees in respect of registrations. “ - - - it is advisable to include fees charged by third party assessment agencies as they also access to the profession”.

For OPFA, it was deemed reasonable to review each topic area separately, though noting their interconnections, and to treat each at a fairly summary level for varying reasons evident below. Given limited funding and the need to work with other regulators in Canada, we have chosen not to employ outside resources.

Findings

In summary, we found that:

- Practical training requirements are justified,
- Work experience requirements are justified and currently could not be changed.
- OPFA decisions are efficient and timely.
- Some opportunities were identified to reduce delays due to inadequate documentation being submitted.
- OPFA fees related to registration are reasonable and, for most international and non-traditional Canadian applicants do not fully recover cost.

Implementation plan

- a) Following evaluation of the new assessment process and receipt of Quebec's results, OPFA will work with the rest of CFPFA (the Canadian Federation of Professional Foresters Associations) to confirm or adjust the Certification Standards and thus the Accreditation Standards, thus maintaining the relevance of the practical training components.
- b) Following evaluation of the new assessment process and receipt of Quebec's results, OPFA will work with the rest of CFPFA to confirm the justification for or adjust the post graduation work experience requirement.
- c) Beginning in 2011, applicants will be encouraged to identify sponsors at the beginning of their work experience, reducing the likelihood of delays due to inadequate sponsorships.
- d) In 2011, the form used to report sponsorship will be revised.

¹ Full text in letter of June 14, 2010 – appendix A

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Statement of approval

This report was prepared by the Registrar for OPFA.

Although the full report was provided in draft to both Committees, Parts A & B were reviewed by the OPFA Registration Committee and Part C was reviewed by the OPFA Finance & Audit Committee.

The full report was subsequently circulated to the OPFA Councillors for any comment before final submission.

Note: The formal submission was somewhat late, although a draft was sent to the OFC before the above reviews and before the target date.

I certify that the report contains the required information and that the information is accurate.

I.H. Tony Jennings, Registrar

Date

Analysis and Findings

A. Practical Training and Work Experience

The practical training requirements of OPFA have been the subject of a major review ending in a new set of standards currently being introduced. The thorough development of the 35 specific core competencies has confirmed both necessity and relevance.

To become an RPF (Registered Professional Forester) anywhere in Canada, requires good character, some local requirements and three elements relevant to the review:

- Graduation from an accredited program (10 programs at 7 Canadian Universities) – or equivalent;
- Relevant post-graduation local work experience – or equivalent;
- Support from 2 Sponsoring Members.

1) Practical Training

While other training is necessary to practice specific aspects, the University program requirement contains the only practical training required to be certified as an RPF.

For this part of the Review, the adopted methodology was documentation of activities recently undertaken.

The University Programs and the Accreditation Standards against which they are evaluated are derived from the Certification Standards, which have been similar among the Provinces for a considerable time. The old standards are still operative until at least 2017 to accommodate students enrolled on this basis. They describe 16 forestry subjects (e.g. Dendrology, Silvics, Forest Pathology, Mensuration) and outlined further foundation basic sciences (e.g. Physics, Chemistry, Biology) and ancillary subjects (e.g. Statistics, Communications). Most of the forestry subjects involved both technical knowledge and the skills for application. Combined they prescribe almost all of the hours for a four year degree.

Beginning in the '90s, discussion of changes occurred. Broader coverage was seen as needed, but more flexibility was also desired. Regulatory Bodies, Faculties and others (employer groups etc) met on several occasions. One suggestion, to simply move to a five year program from the current four year base was narrowly defeated in a formal vote. A project was initiated shortly after the turn of the century, led by the professional associations. The professional forestry regulators in Canada all work together through an unstaffed informal body: CFPFA (Canadian Federation of Professional Foresters Associations).

The "Inclusivity Project" took effective life in 2004 with the hiring of a part-time consultant to coordinate the volunteer effort. Over 300 stakeholders were consulted in an elaborate survey to determine their desired subjects and skills, both in terms of necessary inclusion and priority. This survey was a most thorough review of requirements and formed the basis for subsequent work. The resulting list was winnowed down and then turned into words through years of work to produce 7 broad subject area standards outlining a total of 35 demonstrable competencies, each of which has 2 to 5 indicators by which they can be validated. After further broad consultation on the draft and a workshop with the University Faculties that have or were considering accredited programs, the new certification standards were adopted by all Provinces except Quebec at the end of 2008. The later work on the project was funded in part by HRSDC (Human Resources and Skills Development Canada) which covered expenses, while the regulators provided time.

Thus, a thorough assessment of "necessity and relevance" of practical training requirements was done.

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The OIFQ (Ordre des ingenieurs forestiers du Quebec) had to remove itself from this Inclusivity project and has recently begun to develop its own reconsideration of Certification Standards and thus has initiated a parallel project. Its process is using a different, but complimentary approach: analyzing the range of primary tasks involved in professional practice and the competencies needed for those tasks. The results of their project will either confirm the work of the rest of the CFPFA, or would warrant some reconsideration and adjustment. Their OIFQ outcomes currently are anticipated to be available in 2013.

As the public expectations related to the “development, management, conservation and sustainability of forests and urban forests” continue to grow along with the range of forest products and ecological services, it is likely that another change in Certification requirements will be needed in the not too distant future.

Meanwhile, relevant work continues.

Through 2009, work was focused through the CFAB (Canadian Forestry Accreditation Board established by CFPFA’s Members) on developing Accreditation Standards an assessment manual and acceptance of a revised policy for assessing Universities’ ability to produce graduates meeting all the competencies (except ethics and professionalism – a responsibility seen as best handled by the regulators). Accreditation assessments involve the Faculty assembling extensive, pre-determined documentation and a three or four day site visit by a team of volunteers who interview faculty, students and University administrative leadership. Accreditation is far from automatic and even if recommended, may include recommendations on matters to be dealt with before the next review. While Accreditation is the legal responsibility of the individual regulators, they have all agreed to follow the recommendations of the CFAB Board. This work too was funded in part by HRSDC.

Two Universities had their programs assessed in 2010 against the new standards; their validity has not yet been tested by observing graduates, but all reports so far are good. Two more Universities with four programs are scheduled for accreditation review in 2011.

Individual applicants who are not graduates of the accredited programs (including all Internationally trained applicants) must be individually assessed against the Certification Standards, largely word-for-word identical to the Accreditation Standards derived from them, though the latter have been revised to speak to organizations and classes rather than individuals.

Application of these certification standards is, however, more difficult. How does an applicant prove a competency? What level of proof meets due diligence requirements for the regulator?

Through 2010, CFPFA’s efforts were focused on developing a common process in this regard. While the member regulators had a mobility agreement in place from 2001, it allowed right-to-practice regulators to “look under the hood”, examining the competence of transferring RPFs. This was removed by the recent changes to the AIT and related mobility legislation. Thus, consistency has become critical. We determined that both for efficiency and consistency, our best approach was to work jointly on future assessments against the new certification standards.

Responsibility will continue to rest with the individual regulator to which an applicant applies and for our applicants we will assess character, sponsorships, and the required post-graduate work experience. We will receive a report from the assessment panel identifying any gaps in meeting competencies and will work with applicants on how such gaps can be met. Resources available in this regard vary significantly by province, so we are committed to reporting back on the approaches taken.

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It is important to note that a gap may occur either:

- Because the competency is missing, in which case education or training, supervised experience or some combination may be needed, or
- Because adequate proof is not available, in which case knowledge competency can be tested by exam and skill may be demonstrated by a field review.

Of course, each competency provides a separate set of challenges.

Again supported by HRSDC including another part-time consultant coordinator, we have developed:

- a procedures manual for the regulators,
- an assessors manual for the assessor panels,
- a handbook for applicants, a draft of which was reviewed by OFC staff and which subsequently was edited by a plain language editor.
- Tools (forms) for applicant and assessor use, one of which was presented to significant interest, at the November CNNAR (Canadian Network of National Associations of Regulators) Conference.
- Established a temporary website home.

CFPFA plans to introduce this approach in 2011 with a first assessment panel(s) meeting in October. We are currently waiting to hear from HRSDC about further funding for:

- Training,
- Monitoring (meeting face to face) for the first two years,
- An improved website to allow access from abroad,
- Evaluation at the end of two years.

HRSDC funding is critical in determining the costs to be borne by applicants. There is commitment to the standard which also happens to be suggested by the OFC: cost-based pricing. With this in mind, the CFPFA is also seeking funds to explore:

- standardized resources for applicants needing to fill each competency gap.
- Opportunities for national exams etc. to test gaps

2) Work Experience.

While a thorough review of each course of study during evaluation of programs against the old standards ensured that all relevant aspects of the specified subjects were delivered, the process could not ensure that each graduate took away the requisite skills and knowledge. A further check has been critical to check both whether the applicant had the required knowledge and skill and whether they were able to apply it in the real world. While not able to practice independently during this period, applicants are able to be employed

In Ontario, applicants require 18 months of relevant Ontario (or equivalent) work experience after graduation. Given that the forest management planning process, the centre-piece of Ontario's world-recognized Crown Land Forest Management System, takes three years to complete, 18 months of work experience is not an unreasonable time in which to assess an applicant's application of the knowledge and skills both competently and ethically. Other professions with Members involved in complex extended projects have similar or greater "articling" periods.

The OPFA Registration Committee, and their equivalent in other jurisdictions, considers this time as adequate to allow applicants to demonstrate competence and ethics in several aspects of practice and to demonstrate progressive professional responsibility.

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In Ontario, each of the two required sponsors is required to document two examples of the applicant's relevant work with which he or she has adequate familiarity to provide a professional opinion attesting to the competence and ethics demonstrated. Again, the nature of the work and employment makes 18 months a reasonable period in which to make such observations.

Lastly, and most critical in terms of both a Review of relevance and the decision to make this review at a summary level, all other jurisdictions in Canada which are obligated under Canada's AIT (Agreement on Internal Trade) to accept our RPFs as Members, have a 24 month (2-year) work experience requirement. While in developing the CFPFA Memorandum of Understanding, the other jurisdictions agreed not to require Ontario to increase its post-graduate work experience requirement, that decision was partly reflecting our rigorous approach to the requirement.

Notes:

- While not technically reducing the work experience requirement, the Registration Committee has and regularly applies, the authority to relevant experience after graduation that occurred outside Ontario to meet a part of the requirement. For international applicants, it is relatively easy to see that experience in cooler temperate climates or with boreal forest ecosystems might be more relevant than experience in tropical ecosystems. Recognition of up to six months experience may and regularly is granted for relevant post-graduate study. On the other hand, Ontario's Crown Land Forest Management requirements are unique, complex and require experience.
- Notwithstanding the above noted justification for the work experience, Ontario initiated a CFPFA discussion of this requirement in 2010. As noted above, CFPFA member organizations currently, either through the Inclusivity Project or through Quebec's separate process, are introducing new competency-based standards for certification and accreditation, an approach encouraged by most applicant advocates. After a thorough discussion, CFPFA Members agreed that, when (& if) competencies and the competency assessment process are adequately "proven", reduction of the work experience requirement might well be justified. An assessment of the new certification process for applicants who are not from an accredited program is currently planned after two years of operations (timing and approach are subject to results of an HRSDC funding request). Once the results of that assessment and the Quebec process are received, CFPFA has agreed to reconsider the amount of work experience required.

Treating this review at a summary level is deemed adequate and the Work Experience requirement is deemed necessary for now.

Recommendations:

- e) That, following evaluation of the new assessment process and receipt of Quebec's results, OPFA work with the rest of the CFPFA to confirm or adjust the Certification Standards and thus the Accreditation Standards.
- f) That, following evaluation of the new assessment process and receipt of Quebec's results, OPFA work with the rest of the CFPFA to confirm or adjust the post graduation work experience requirement.

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B. Timeliness of Decisions

The audit of OPFA Registration practices completed in 2010 found zero instances of missed timeliness, nor reason to recommend changes in the timing targets.

For OPFA, decisions covered by the required Review of Registration practices include:

- 1) Approval or identification of missing or inadequate elements,
- 2) a degree equivalency decision and report is required from WES (World Education Services) or CES (Comparative Education Services) for all international or domestic applicants who have not graduated from an accredited program (see above),
- 3) Assessment of degree content based on transcripts and course descriptions,
- 4) Exams – while technically not registration decisions, the timing of exams is covered in this Review, as well as the decision regarding results;
- 5) Appeals.

All our timelines are favourable when judged against the expectations of the OFC, the Canadian Governments' FQR (Foreign Qualifications Assessment and Recognition) Protocol, or the experience of other professions. Since all processes are simple, documentation and a summary Review has been deemed adequate.

For completeness, we have chosen also to include a summary review of

- 6) The planned assessment process for non-accredited applicants.

The above six items are considered below:

- 1) The Act (Professional Foresters Act 2000, as amended) does not allow for delegation of Registration decisions. The Registration Committee meets bi-monthly. Once an applicant has provided all required documentation, their application is sent to all committee members about a week in advance and is discussed at the next meeting. Meeting minutes are provided to the committee within approximately a week; errors or corrections might take a second week, after which, applicants are advised by Email that they are accepted, that they must fill some subject requirements (write exams) or that the committee considers their documentation inadequate.

Accepted applicants are mailed their certificate, member information binder and professional seal as soon as the latter is received from the producer.

As soon as inadequate documentation is corrected, the application package (or the revised document) is provided to the next committee meeting. While not frequent, the commonest such issue is an inadequate sponsorship in which case the sponsoring Member of the Association is contacted before the applicant is advised. This has, on occasion, meant delay of another week.

Applicants required to write exams are approved as Provisional Members (not entitled to practice), subject to their choosing to proceed with the exam(s) and paying requisite fees (see below).

The decision timing seems good. Further, the Committee has been willing on occasion to consider some matters between meetings when an applicant has a legitimate reason for urgency (e.g. job offer).

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Are there ways to further improve the timing?

- Committee Members are volunteers and already accept a heavy time commitment to review submissions and attend meetings; increasing the frequency would not be acceptable.
- Delegation to staff might be authorized by a change in statute, but, given very limited resources, the only qualified staff is a part time Registrar, with other responsibilities. Such delegation would be unlikely to improve the speed and in certain circumstances, might delay things.

Note: While not formally related to timeliness of a Registration decision (i.e. from receipt of a complete application package), it was noted above that an applicant can experience a delay beyond their control when a sponsoring Member's report is inadequate and thus the application is incomplete. Two actions have been initiated due to identification of this issue.

- One cause of inadequate sponsorships (or difficulty in finding a sponsor) was the fact that applicants sought sponsors after the period of work the sponsors would need to assess. Thus the sponsoring Member may not have adequately observed the applicant's practice. OPFA by-laws were revised effective December 1, so a future applicant will need to be a Provisional Member while gaining this experience (a practice that exists in other Provinces, though called "internship" or "Graduate Forester in Training").

Applicants will be encouraged to identify sponsors at the beginning of their work experience, reducing the likelihood of delay due to inadequate sponsorships.

- As well, the form used to report sponsorship is to be revised in 2011.
- 2) Meetings were held with both WES and CES and their timeliness is comparable to or better than the above. Applicants should receive equivalency assessment reports well within two months of submitting full documentation.

No further Review or recommendation seems warranted.

- 3) For all international and domestic applicants not graduates of an accredited program, assessment of degree program(s) content is undertaken by one of our Registration Committee volunteer members with relevant background (Current or previous Dean of an accredited program). Though in previous years we had encountered longer delays when other priorities prevailed. A target was established to have the assessment done and communicated within six weeks and this is usually completed sooner. This process is to be replaced by the new assessment process later in 2011.

No further Review or recommendation seems warranted.

- 4) All applicants, unless they are recent graduates of the accredited program at Lakehead University where the material is thoroughly covered in a required course, must write a local knowledge, open book, exam (approved under AIT for transferring RPFs as well). Gaps identified in an applicant's education can be filled by writing an exam for each required subject). All exams except one are set at a time and location of the applicants choosing, subject only to their arranging with a Member to invigilate the exam. The one exception is a project based "exam" and the relevant timing is worked out between the examiner and the applicant.

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No further Review or recommendation seems warranted.

- 5) Under the Act, the applicant has the right to request reconsideration by the Committee and to provide a written submission. The Fairness Act required the addition of an independent internal appeal body and the Act was amended in late 2009 to allow by-laws to establish this body and the related processes. The relevant by-law sections were developed and after review by the membership and the OFC, took effect December 1, 2010. An appeal would follow reconsideration.

There is no record of any request for reconsideration, nor for an appeal. This is likely due to the practice of the Registration Committee to defer consideration while staff (or occasionally committee members or other “volunteered” Members) work with the applicant to find a way to meet requirements. Thus, there is no record of an appeal.

Reconsideration would occur at the next meeting following receipt of a request and any submission.

The Executive Committee of the OPFA has been designated as the appeal body. It meets roughly quarterly and also can and does meet at the call of the Chair on urgent matters so the Executive Committee could deal with an appeal quickly if a scheduled meeting was not reasonably close.

No further Review or recommendation seems warranted.

- 6) The new assessment process for international and domestic applicants who are not graduates of accredited programs will be a more complex process than the current review of subjects taken. While competencies can be acquired outside the formal educational environment, due diligence consideration of the proof(s) is more complex and thus slower. As well, the AIT requirements for mobility without competency review create an essential consistency of process that CFPFA has chosen to deal with by working jointly. This process will be slower for each regulator than the previous process (current at time of writing). but are clearly needed. CFPFA has committed to hold two assessments a year to ensure that all affected applicants, even if they just miss a submission deadline, will have a decision within a year – the target stipulated under the FQR protocol. At least in the first two years, training of volunteers and assessment meetings need to be face-to-face. Increasing the frequency of the assessment, as well as straining volunteer resources, would increase applicant costs (see below).

No further Review or recommendation seems warranted at this time. As noted above a review is planned after experience with the new process and the results of the Quebec project may be relevant.

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C Reasonableness of Fees

Fees relevant to Registration were part of a Review of all OPFA Fees undertaken in 2009 by OPFA's Finance and Audit Committee at the Direction of Council. Council accepted the findings of the Committee and approved their recommendations. Members were advised and later approved the fee schedule including changes at the 2010 Annual Meeting. Only one Fee change related to Registration – assessment of degree content.

The methodology for the Review of all fees was simple:

- Do the fees reflect the costs involved? (The OFC suggested test)
- Do the fees compare reasonably to other provinces and other professions?

Comparisons were made with a number of Ontario professions and with Professional Foresters in other right-to-practice jurisdiction. While it was not always possible to compare Fees one-for-one as cost allocation approaches and fee structures varied, all OPFA fees compared favorably with those of the other regulators.

The fact that the time required (and thus cost) to serve different sub-sets of applicants, and thus that OPFA fees do not adequately recover the costs incurred in assisting international or non-traditional Canadian applicants also was noted in the Fairness Audit of OPFA registration practices completed in 2010..

Four fees can be involved in the registration application and registration process. All were deemed appropriate:

1. Application fee - \$200
 - a. Annual staff and meeting costs involved in dealing with applicants, preparing materials for Registration Committee meetings, meeting costs (normally conference calls except one meeting per year were considered. The one face-to-face meeting is connected to the Annual conference and AGM, so travel costs for committee members is only borne by OPFA, if not covered by their employer/business, and the cost of one meal and one night accommodation is usual. In some years, a second face-to-face meeting may be held to consider policy or process matters, but no allowance was made for such meetings. No allocation was made for office or equipment overhead.
 - b. The application fee does not quite cover the average of the above cost, but would cover the cost for a straight forward applicant, i.e. a graduate of an accredited program with good documents and good sponsorships on first submission.
 - c. International and Canadian applicants who did not graduate from accredited programs typically take more time for both staff and Committee due to additional documentation and increased dialogue to assist in preparing adequate application packages. International applicants typically require the most time with staff and or Committee members for advice (e.g. arranging sponsors), but do not normally take more time at the Committee meeting. Despite this, the OPFA policy of encouraging membership was the basis for the decisions to maintain the fee at its previous level and to not differentiate between kinds of applicants.
 - d. Currently there is no separate registration fee; the application fee is deemed to be the registration fee for successful applicants. There are registration costs: purchase of a seal and wallet card, production of a certificate and a binder of reference materials, all of which are shipped to the successful new member. Such costs are borne out of annual memberships.

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2. Exam Fee - \$75

- a. A recommended reading list is provided by the staff to the applicant for the subject to be examined.. Exams are written at a time and place of the applicants choosing. They must arrange with a current Member to act as invigilator (volunteer). On occasion, staff will arrange for an invigilator. The exam is sent by OPFA staff to the invigilator just before the exam is to be written. The invigilator collects the exam and sends it to the OPFA office, for copying and forwarding to the examiner to mark. Results are sent to the OPFA office and staff advise applicants of results including any advice about preparing for re-writing if they are unsuccessful. Some examiners are willing to talk to applicants directly before &/ or after the exam is written; some are not.
- b. An honorarium of \$50 is offered to examiners. The remaining \$25 is considered adequate to cover office costs in straight forward situations.

3. Assessment Fee - \$75

- a. Applicants not graduates of an accredited program have the course content of their degree(s) assessed subject by subject against the old subject-based standards (see above). They must provide course descriptions in English for all relevant subjects. These are received in the office and sent to the assessor, a member of the committee. The current and previous assessors have been Deans of a forestry faculty with an accredited program. Results are provided to the OPFA office and staff then advise the applicant of the results.
- b. This fee was introduced in 2010 to allow payment of an honorarium too the assessor, similar to the exam fee. Again, the remaining \$25 is considered adequate to cover office costs in straight forward situations.

4. Provisional Membership - \$25 annually

- a. While writing exams and as of 2011, while gaining the required work experience (see above), applicants must become Provisional Members of the OPFA, bringing them under the Association's jurisdiction and meaning that the code of ethics, misconduct definition, etc. apply. While not entitled to practice, Provisional Members have access to all services.
- b. The nominal annual fee is not intended to cover the proportionate share of the governance, administration and services costs. It is small enough to not be a burden, but does serve as an confirmation of intent to continue toward full membership.

There are two other matters to consider

1. Proposed Assessment Fee

- a. While not a current fee during the period of the mandatory Reviews, later in 2011 the CFPFA (the Professional Forestry regulators across Canada) expects to introduce a jointly administered process (see above) for assessing applicants' competencies against the new competency based standards, evidence provided by international and Canadian applicants who have not graduated from accredited programs. The regulators have agreed that the process must be cost neutral.
- b. An estimate based on 2 day panel meeting to consider 10 applicants produced a fee of \$500 per applicant. The fee is to be adjusted periodically to reflect actual costs as experience develops.

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- c. A request for reconsideration based on supplying further information would be referred back to the same panel and is planned at a cost of \$250 as it should not mean a full process. An appeal to a new panel would incur full cost.
- d. The OFC report on 3rd party assessments has proved to be a useful reference, confirming that this expected fee would compare favourably with other assessment processes.

2. 3rd party fees

- a. Applicants who are not graduates of a Canadian program or who are relying on international education for part of their qualifications, must have their non-Canadian education assessed regarding equivalency to a Canadian 4-year, science-based, degree. WES and CES have been used. As noted above, both have been visited and their management interviewed to review their processes. Their fees vary (appendix C), but again, the OFC report on 3rd party assessments has proved to be a useful reference, confirming that both compare favourably with other assessment processes.

No recommended actions were identified.

Appendix A



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June 14, 2010

Dear Colleague:

Re: Entry-to-Practice Reviews

Further to my letter of June 3, 2010, regarding the OFC's future activities, I am writing to provide you with additional direction with respect to Entry-to-Practice reviews.

Entry-to-Practice Reviews are fundamental as they are the only real opportunity, stipulated in the legislation, for the regulatory bodies to probe the relevance and necessity of their registration requirements. Also, Entry-to-Practice reviews are an integral part of the key activities that the OFC will undertake to promote continuous improvement.

Over the past three years you have submitted fair registration reports and audit reports. To round out the initial phase of our mandate, the OFC requests that regulatory bodies conduct an Entry-to-Practice review.

To reduce the reporting burden, the OFC has limited the scope of the reviews to only three items as follows:

- (a) if applicable, an analysis of the necessity and relevance of the requirements for practical training and or work experience, including any practicum, mentorship, internship or residency;
- (b) an analysis of the efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals; and
- (c) an analysis of the reasonableness of the fees charged by the regulated profession in respect of registrations. In the analysis it is advisable to include fees charged by third-party assessment agencies as they also impact access to the profession.

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The OFC has defined the scope of the first review differently from that described in section 3b (p.19) of our publication “Conducting Entry-to-Practice Reviews: Guide for Regulators of Ontario Professions,” in which the scope was to be determined collaboratively with the regulatory body. These items were selected based on the OFC’s analysis of information it has gathered from regulatory bodies, qualification assessment agencies and applicants over the last three years. These three areas require further study as they tend to pose continuing challenges to applicants.

Regulators who have completed reviews and/or implemented changes to one or more of these items between July 1, 2009 and June 30, 2010 will not have to repeat the review; however, a report of the review should be submitted in accordance with pages 31-32 of the Entry-to-Practice review guide. This guide can be found on the OFC website at http://fairnesscommissioner.ca/en/downloads/PDF/entry_to_practice_reviews_guide_en.pdf.

We would be pleased to discuss and clarify further any questions or concerns regarding the review. To this end, please contact Nuzhat Jafri at 416-325-9651 or nuzhat.jafri@ontario.ca.

Sincerely,

Honourable Jean Augustine, P.C.
Fairness Commissioner

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Appendix B

Fee Schedule: *effective December 1, 2010*

Council Approval: February 9, 2010 on the recommendation of the Finance and Audit Committee.

Member Concurrence: April 15 at the 2010 AGM, Pembroke, ON,.

Rule 1 - Fees

Annual Membership Fees are due and payable to the Ontario Professional Foresters Association on the first day of the Associations fiscal year being December 1. New members will pay pro rata fees according to when their application is accepted and the months remaining in the current fiscal year.

ANNUAL FEES

- a) Full Active Members:** The annual fee for Full Members shall be \$450.00 due upon receipt of notice.
- b) Associate Members:** The annual fee for Associate Members shall be one half of the annual fee for Full membership (\$225.00)
- c) Non-Resident Members:** The annual fee for Non-Resident Members shall be one half of the annual fee for Full membership (\$225.00)
- e) Inactive:** The annual fee for Inactive Members shall be at the rate of one half the annual fees for Full Active membership (\$225.00)
- f) Provisional Members:** The annual fee shall be \$25.00.
- g) Student Members:** There shall be no fee for Student Members.
- g) Life Members:** The fee for Life Members shall be a lump sum of \$630.00 plus an amount derived from the following formula: $(1/2 \text{ rate of Full annual fees}) \times (65 \text{ minus age in years})$. Note: 65 years and over to pay \$630.00 only. After this payment, there are no annual fees.
- h) Honorary Members:** There shall be no fee for Honorary Members.

Note: Any annual membership fees category may be paid in full when due or be paid by one of the following options using accepted credit cards or post-dated cheques:

1. Split Payment, with an additional administrative charge of \$10, effective Dec. 1 and April 1.
2. Pre-Authorized monthly payments with an additional administrative charge of \$30,
3. Such other arrangement for payment that the Member and Registrar may agree , in circumstances of need,

i) Temporary Members: The Fee for a three month period shall be \$125.00

j) Application Fee: A fee of \$200.00 shall accompany any application for registration as a member of the

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Association, including those for reinstatement of former members.

k) Registration Fee: The application fee shall be deemed to be the registration fee when the applicant has been accepted and registered.

In the case of an applicant who is not a graduate of an accredited program, the applicant shall be charged for out-of-pocket expenses as accrued by the Association in processing the application-

l) Examination and Assessment Fee:

A fee for each examination tried or transcript assessed by an OPFA volunteer as required by the Registration Committee shall be \$75.00.

m) Fees or obligations in Arrears: The Executive Director shall send notices to members showing outstanding obligations and fees due and payable, in conformance with the By-laws.

n) Reinstatement: - Resigned members or Members whose certificate has been cancelled are additionally subject to a penalty equal to the annual fee for the year in which they are reinstated.

o) Penalty/Late Fees and/or reporting: Payments and/or filing of required information due at the end of the fiscal year, shall be subject to an additional \$50.00 fee, effective January 15th next following and shall escalate by a further \$10 per month beginning February 1st, until the obligation is met, a suspension is issued or an arrangement for payment and/or reporting agreed upon by the Member and Registrar.

p) Administrative charges: Costs incurred on behalf of individual members for services shall be recovered with an allowance for "shipping and handling" – e.g. replacement of a lost or damaged seal - \$75.00.

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Appendix C

3rd party assessment rates relevant for OPFA applicants (from websites)

CES Service Fees

Costs for Service

CES offers the following services. All fees are quoted in Canadian Dollars.

Assessments

Regular Service

- \$226.00 (\$200.00 + applicable taxes)

Rush Service

- \$508.50 (\$450.00 + applicable taxes)
- 5 business days - upon receipt of all documents

***RECEIVE \$150 COURSE CREDIT WITH YOUR ASSESSMENT**

CES clients who have paid for either regular or rush service assessments commencing January 2010 are eligible for:

\$150 (CAD) credit applied towards any Business and Professional Studies or English Language Program course offered through SCS.

WES FEE SCHEDULE

Note: All fees are subject to 13% Harmonized Sales Tax (HST)

CREDENTIAL SERVICES FEES (7-DAYS) <u>Which credential service is for you?</u>	
<u>WES ICAP</u> (Transcripts + Evaluation)	
Course-by-Course (with GPA & course-levels)	Cdn. \$240
Document-by-Document Evaluation	Cdn. \$145
WES Basic Evaluation	
Course-by-Course (with GPA & course-levels)	Cdn. \$210
Document-by-Document Evaluation	Cdn. \$115
Upgrade from Document-by-Document to Course-by-Course	Cdn. \$150

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<u>Upgrade</u> from WES Basic to WES ICAP Service	
While evaluation is in progress	Cdn. \$30
After evaluation is completed	Cdn. \$80
<u>ADDITIONAL REPORTS</u>	
WES ICAP	
Additional Copy anytime (per report)	add Cdn. \$30
WES Basic	
Ordered at the time of application (per report)	add Cdn. \$30
Ordered after completion of the evaluation	
First Report (for every new or follow-up order)	add Cdn. \$45
Each Additional Report	add Cdn. \$30
DELIVERY METHODS	
Next-day Courier Delivery (per Canadian address)	add Cdn. \$25
U.S. Next-day Courier Delivery (per address)	add Cdn. \$75
International Courier Service (per address)*	add Cdn. \$75
Canadian Registered Mail (per address)	add Cdn. \$20
U.S. and International Registered Mail (per address)	add Cdn. \$30
Fax to Canadian and U.S. Recipients (details)	add Cdn. \$10
Sealed Envelope (per envelope) (details)	add Cdn. \$10
* delivery times may vary	
OPTIONAL RUSH SERVICES	
3-Day Service	add Cdn. \$100
Same-Day Service	add Cdn. \$200

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Same-Day and 3-Day evaluations are only completed upon receipt of a complete application with all necessary documents and payment (holidays and weekends not included). If received after 3pm for Same-Day service, the evaluation will be completed the following business day.