

**ONTARIO ASSOCIATION OF CERTIFIED ENGINEERING TECHNICIANS AND  
TECHNOLOGISTS**

**SUBMISSION**

**ON**

**Discussion Paper: Transforming and modernizing the delivery of Ontario's Building Code  
services (ERO 019-0422)**

**November 18, 2019**



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## **Introduction**

The Ontario Association of Certified Engineering Technicians and Technologists (OACETT) is a non-profit, self-governing, professional association of over 25,000 members. OACETT is Ontario's independent certifying body for engineering and applied science technicians and technologists and confers the designations C.Tech. (Certified Technician) and C.E.T. (Certified Engineering Technologist).

OACETT welcomes the opportunity to provide feedback on the policy proposal *Transforming and modernizing the delivery of Ontario Building Code services*. OACETT has long supported any new or enhanced building services that create consistency within the approval process and promote public safety. OACETT's commitment to public safety is enshrined in our Mission Statement:

***OACETT is Ontario's independent certifying body for engineering and applied science technicians and technologists. The Association provides member certification, career-long educational opportunities, professional support for the benefit of the economy and safe and secure communities.***

Our members represent many of the stakeholders affected by this policy proposal, including designers who are part of the vital building industry sector and strive to increase housing supplies and maintain a safe and prosperous key to Ontario's economy. In particular, it is our certified members whom we feel may provide the ministry with a solution to successfully implement a transformative change to the way building services are delivered in Ontario.

OACETT shares your vision that the ministry needs to implement a model that will enable the delivery of improved services to promote consistency and better support the sector. The

OACETT solution seeks to address particular aspects of the policy proposal that can use our certification model to address some of the challenges the ministry outlines, while keeping public safety a top priority.

### **Exam Development and Delivery**

#### ***How could the current examination design, content and/or delivery be improved?***

#### **OACETT Solution:**

OACETT proposes that a full review of the building code exams be conducted with a broad sector of stakeholders involved in the process including OACETT certified members. Our members are highly educated and skilled in many of the technical content covered in the sixteen building code exams required as part of becoming a qualified building code professional in Ontario. The exams of particular interest to OACETT include:

- Designer Legal/Process
- House
- Small Buildings
- HVAC-House
- Detection, Lighting and Power
- Building Services
- Plumbing-House
- Fire Protection
- On-site Sewage Systems

The Ministry must improve the clarity of the questions in the exams given the full range of professionals that take the exam and their varied backgrounds. OACETT is a willing partner in sharing our member expertise in guiding any review stages. This would also include reviewing the current time allotment to complete the exams. We feel having OACETT at the table will bring further support and success to any review process.

## **Pre-Qualification Training**

***Are current training opportunities meeting your needs? If not, how could training be improved?***

### **OACETT Solution:**

As previously stated, OACETT believes that our certification model with mandatory CPD requirements delivers a robust solution for any pre-qualification training by offering designers, in particular, a standard or minimum bar of education and experience. Our members are graduates of a two or three-year program from Ontario's college system or higher, and further enhance their professionalism by obtaining professional certification. A post-secondary education coupled with the addition of our robust certification program, which includes a requirement to complete a Professional Practice Exam (PPE), meet a language benchmark, and in some cases, a technology report further guarantees the quality of designers entering the building industry field.

OACETT believes making our certification a minimum requirement for a designer to embark on any further building code training and/or write any of the building code exams as specified in the *Exam Development and Delivery* section of our solution. We believe this provides a professional solution to the Ministry's goal of maintaining confidence in the safety of Ontario's buildings. OACETT certification is only granted to members who have obtained two years of work experience, which, coupled with our PPE, and technology report, offers designers a generalist high standard benchmark as a starting point for further building code education.

Our certification program has always been a trusted source of high standards and professionalism to the industry, government and, the profession. We raise the standard by offering education through our mandatory CPD program, high ethical standards in our Code of

Ethics, and minimum two years of appropriate level *experience*, all combined to create a solid foundation for a designer to enter the building industry.

### **Coordinating Professionals – Prime Consultant**

***Do you think the use of a Prime Consultant, under certain circumstances, would support a more streamlined building permit application process?***

#### **OACETT Solution:**

The Ministry has shown its innovative thinking with the proposal to utilize a potential *Prime Consultant* in order to streamline the development approval process. OACETT feels stakeholders require further clarity on the definition and role of a *Prime Consultant* and we would welcome a future discussion on developing a more in-depth definition with the Ministry. We are concerned with the absence of detail, and our initial comments are based on the limited definition provided in the discussion paper.

Based on the current limited description as outlined in the *Discussion Paper: Transforming and Modernizing the Delivery of Ontario's Building Code Services*, we feel there is a role for our certified members who are qualified designers to act as a *Prime Consultant* in order to provide the solution the Ministry is looking for in reducing the lengthy approval processes that delay the construction of buildings. In particular, qualified designers who are OACETT certified members should be considered *Prime Consultants* in any design that falls under Part 9 of the Ontario Building Code. This will provide the building industry more options in terms of utilizing professional expertise and an excellent opportunity to improve the approval processes in Ontario.

An OACETT certified member who is a qualified designer as per the OBC should be recognized as a *Prime Consultant* in recognition with the code for those buildings that do not require a Professional Engineer or Architect.

### **Coordinating Professionals – Certified Professionals**

***Do you think the use of Certified Professionals, under certain circumstances, would support a more streamlined building permit application process?***

#### **OACETT Solution:**

Once again, we applaud the Ministry's proposed intent to provide a solution to smaller communities where resources are not adequate, and staffing levels are not able to provide plan reviews or inspection services certified to the CBO. As per our *Prime Consultant* solution, as a self-regulatory body with high standards and a robust certification program, we feel our certified members should be recognized as *Certified Professionals* for all designs submitted under Part 9 of the OBC.

Our members who are designers are qualified to conduct plan reviews and inspections as the addition of our designations raise the bar in terms of qualifications above and beyond the standard designer qualifications. OACETT feels the *Certified Professional* should not be restricted to a Professional Engineer or Architect to engage in *Certified Professional* services on behalf of permit applicants. Adding OACETT certified members to the *Certified Professional* title for Part 9 building provides additional options for municipalities struggling with handling an ever-expanding and complex building code and sourcing professional expertise.

## **Continuing Professional Development**

### **OACETT Solution:**

We wish to thank the Ministry for recognizing OACETT's certification program and mandatory CPD as good standard practice for designers in Ontario. We have an 86% compliance rate in our CPD program based on an initial audit. OACETT feels our current CPD program may be utilized to create a CPD program that should be recognized as forming the knowledge and maintenance requirements of a CPD program for designers. Our recommendation would not duplicate any training as part of the Ontario Building Officials Association (OBOA) Certification Program, but rather provide a solution to the Ministry that provides CPD for designers.

By prescribing our CPD program as an acceptable requirement for CPD for a designer, we feel the Ministry will raise the bar in terms of designer knowledge base and reduce the cost and complexity of having the Ministry administer a new CPD program. By way of adopting OACETT certification as a requirement for designers, our mandatory CPD program will satisfy the Ministry's proposal to ensure professionals stay up-to-date with new developments in the fields.

Furthermore, our mandatory CPD requirements include confirmation of completion to verify all training and a three-year cycle to complete any mandatory CPD with a compliance audit. This we feel confirms the professionalism of our CPD system, which is already in place and ready to be used as a solution for designers.

## **Should the Government Create an Administrative Authority?**

### **OACETT Solution:**

OACETT proposes that no new administrative authority be created for the following reasons:

1. Oversight and delivery of building code services should remain in the hands of and control of the building branch and the government.
2. The MMAH is the author and custodian of code and should, therefore, be the sole body that administers the essential building industry service.
3. An administrative authority will create yet another layer of bureaucracy and more red tape for the building sector and public.
4. Further government resources will be required to oversee a new administrative authority.

We wish to state that regardless of the decision, the OACETT solution involves our professional association acting as a co-regulator and/or partner with other existing associations who have the infrastructure in place to address some of the needs identified in the discussion paper. Our certification system and mandatory CPD requirement provides a turn-key solution for the delivery of training for designers and will form a reputable accredited agency.

By relying on our current infrastructure, the Ministry will achieve its goal of reducing the load on the government while still administering the building services program. This ensures OACETT and other partners are part of the process and solution.



## **Conclusion**

Modernization and transformation of Ontario's building code services are long overdue. However, in order for it be a success, we feel the change must be conducted with partners who can provide solutions that maximize efficiencies and raise the bar for the building industry, municipalities, and designers. We feel OACETT certification should become the minimum standard for designers, and our CPD program, by default, would align with the proposed mandatory CPD.

We understand the ultimate goal of these proposed changes is to improve the delivery of building services for a vital key driver of Ontario's economy. On behalf of our membership, we thank you for the opportunity to provide you with a solution. OACETT looks forward to developing a strong partnership and to meeting with the Ministry shortly to further discuss our proposed solution.