



January 16, 2023

Ministry of Municipal Affairs and Housing

Attention: Mansoor Mahmood,
Director Building and Development Branch
777 Bay Street, 17th floor
Toronto, Ontario
M7A 2J3

RE: AATO RESPONSE TO PROPOSED ENHANCEMENTS TO THE QUALIFICATION PROGRAM FOR ONTARIO BUILDING PRACTITIONERS

Dear Mansoor,

On behalf of our membership and Accredited Architectural Technologists across Ontario, the AATO is pleased to respond herewith to the Discussion Paper.

OVERVIEW

According to the Discussion Paper, the principal motivation behind the proposed enhancements appears to be increasing the number of building practitioners in order to achieve the government's objective of building 1.5 million net new housing units over the next decade. An important obstacle to the achievement of that objective is the inadequate number of building practitioners due to a large retiring cohort and a substantial shortfall of new entrants to replace retirees and address both current and projected demand. " Low pass rates" for the BCIN and the need to "improve exam success" are identified by the Discussion Paper as issues that need to be addressed in this regard.

As an overarching theme, the AATO strongly believes that public safety and public confidence in the services that building practitioners render must always be the principal --- and perhaps the sole ---- consideration behind any enhancements to the qualification program.

The AATO also points out that employment shortages have become a fact of life across most sectors of Ontario's economy. Due to the persistent shortfalls in the building trades, increasing the number of building practitioners will not, in and of itself, address the problems identified by the Discussion Paper. Those widespread and chronic shortages point to the need for a comprehensive federal and provincial government strategy that must include attracting qualified practitioners from other jurisdictions. The AATO is concerned that some suggestions in the Discussion Paper could have the contra- intended impact of complicating or interfering with the ability of out-of-province and foreign-trained building practitioners to pursue that occupation in Ontario.



Nevertheless, there are solutions at hand that, if implemented, would immediately add substantially to the number of highly qualified and building practitioners. Those solutions are:

- Exempt AATO members (Accredited Architectural Technologist) from the requirement to successfully challenge the BCIN examination and maintain a BCIN number; and
- Restore AATO stamps for accredited “Architectural Technologist” and have them recognized for permit submissions.

The AATO will continue our professional development and self-govern through accreditation exams as we always have.

The AATO has put forward these solutions a number of times already and urges the Ministry to implement them without further delay.

POINT- BY- POINT RESPONSE listed below:

Action #1

The AATO endorses the recommendation to allow the digital copy of the Building Code to be used by candidates during BCIN examinations. Candidates should, however, be digitally savvy and encouraging them to be so will enhance their productivity. Nonetheless, there will still be a few candidates that will continue to resort to hard copy and their circumstances need to be respected. Lengthening the maximum time allowable to take the examination is an important step in that regard.

Action #2

As already indicated, the AATO endorses increasing the maximum time available to candidates to complete the exam. Reducing the number of questions by 20%, however, strikes us as extreme and may risk degrading the ability to test competencies effectively, unless there is clear evidence that the current number of questions is excessive, or the questions themselves are duplicative. Increasing the overall maximum time to take the exam appears to be a far better solution in the interest of public safety and public confidence.

Action #3

The AATO heartily endorses the creation of a mandated training program as a condition to challenging the BCIN exams. The AATO also recommends that prior practical experience in the field of at least 4 years should also be required.

AATO members having already obtained sufficient training as a condition of their membership in the AATO should be exempted from this requirement.



Action #4

As already indicated several times, the AATO agrees to the recommendation to recognize "equivalent" training and certification and specifically recommends that AATO membership be accepted and recognized as equivalent to BCIN certification.

In terms of other certifications and training to be recognized as equivalent, the AATO trusts that the Ministry will look to objective and independent assessments of equivalency to ensure that the competency standard is not in any way degraded.

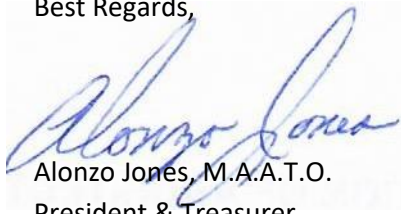
Action #5

The overarching criterion in restructuring the examinations should be to ensure that there is no erosion in the capability of the examinations to validate necessary competencies. Achieving higher pass rates or improving the examination experience should not be entertained as objectives. The AATO points out that there are multiple organizations that are expert in structuring examinations and examination questions in order to achieve the objectives and recommends that one or more of such organizations be retained by the Ministry to undertake this important work.

Action #6

Ensuring continuing and updating competency is a standard requirement for every regulated profession and occupation and should apply to building practitioners.

Best Regards,



Alonzo Jones, M.A.A.T.O.
President & Treasurer

CC; Chetan Mistry