

January 31, 2023

Ministry of Municipal Affairs and Housing  
Services Transformation Branch  
12th Floor, 777 Bay Street  
Toronto, ON  
M7A 2J3



*Submitted electronically*

***RE: RESCON's Feedback to Future Enhancements to the Qualification Program for Ontario's Building Practitioners - Discussion Paper***

**Action 1: Use of the Digital Building Code During Exams**

- 1.1 We support providing candidates with the option to use a digital copy of the Building Code during BCIN exams.
- 1.2 No concerns with this approach as increased digital access to resources is a common societal progression in various other sectors.
- 1.3 If the ministry were to proceed with digital access to the Building Code, it should be keyword searchable to assist with navigating.

**Action 2: Allow Candidates More Time per Question During Exams**

- 2.1 We support the move to reduce the number of questions from 75 to 60 to better allow adequate time during the BCIN exam. The exam should be designed to test knowledge and not how quickly one can navigate the Code.
- 2.2 Allow option to grant time extensions for extenuating circumstances, such as instances where English may be the second language of the candidate.

**Action 3: Mandatory Training**

- 3.1 While pre-qualification training is a good idea and will likely lead to greater exam pass rates, it may be advisable to make this mandatory only for individuals with no past educational or work experience in this field. Whereas for individuals who may have related education or work experience in engineering, architecture, construction, or a skilled trade, there should be an option to bypass the pre-qualification training.
- 3.2 If pre-qualification training were to proceed, it should be offered with both an in-person and virtual/online format to be flexible to the schedules and possible geographic barriers of potential applicants.

**Action 4: Provide Alternative Ways to Enter the Sector**

- 4.1 The ministry definitely needs to provide for BCIN exemptions, considering both other qualifications as well as work/field experience. Without considering alternative approaches other than the BCIN examination, the likelihood of attracting the necessary workforce to meet demand seems bleak.
- 4.2 Exemptions should be granted for relevant educational credentials, such as a university degree in engineering or architecture or a college diploma in engineering technology, to name a few. Furthermore, proven work experience in a related skilled trade as well as recognizing certain licensed trades, should also qualify for BCIN exemptions.

#### **Action 5: Provide Alternative Ways to Enter the Sector**

- 5.1 There are no concerns with restructuring some of the BCIN exams. This would allow practitioners to focus on a particular core sector, whether it be Part 9 small buildings or Part 3 large buildings, or these core sectors can be achieved in phases by the applicant.
- 5.2 We support the idea of developing core exam areas separately for Part 9 small buildings and Part 3 large buildings. These core structures follow the existing Code format and are a well-suited way to split the technical subject matters into more easily manageable components.

#### **Action 6: Knowledge Maintenance Requirements**

- 6.1 The idea of introducing some type of mandatory Continuing Professional Development (CPD) is long overdue and would align with other associated industry professionals, namely those regulated under the OAA and PEO. With every new edition of the Building Code and the many interim amendments, significant technical changes are introduced and building practitioners need to stay well informed of these changes. This is a beneficial change and can be timed to coincide with updates to the Building Code.
- 6.2 While it would likely be fine to limit the scope of learning attestations to only Building Code amendments, it could also include other areas of focus to be pertinent, such as new information gleaned from Building Code Commission hearings or other relevant technical developments and building industry trends.
- 6.3 With Code amendments typically being distributed through Ontario CodeNews, this only acts as a distribution outlet of information, and does not provide an opportunity for questions to be addressed or dialogue amongst building practitioners, meanwhile some interested practitioners may benefit from additional resources or CPD opportunities.