

# 2023 Registration Review Report

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Certified Technicians and Technologists Association  
of Manitoba



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## Introduction

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The Fair Registration Practices Office (FRPO) issues this registration review report for the Certified Technicians and Technologists Association of Manitoba (CTTAM) under authority of The Fair Registration Practices in Regulated Professions Act (act).

Registration reviews are conducted at times specified by the director of fair registration practices and in accordance with the review provisions in the act, section 15.1, 15.2, and 15.3. The purpose of this review is to determine compliance with the legislation and to identify areas that may need 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 director.

Manitoba's fairness legislation was amended in December 2021. This review is largely restricted to the consideration of compliance regarding three new duties in the Fair Registration Practices Code: a duty that assessment criteria be necessary, a duty to abide domestic trade agreements and a duty to notify FRPO regarding changes in assessment and registration practice. Outstanding issues raised in previous registration review reports may also be raised or result in further recommendation for action.

Registration reviews that result in recommendations to change practice or policy result in a request for the regulated profession to provide an action plan to address the issue(s).

To provide context, a brief description of CTTAM's state of progress under fairness legislation to date precedes the compliance analysis.

## State of Progress

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The Certified Technicians and Technologists Association of Manitoba (CTTAM) is committed to the fair assessment and registration of internationally educated technicians and technologists. Since the introduction of Manitoba's fairness legislation in 2009, CTTAM continues to co-operate with FRPO and make significant progress in fair registration practice.

Some of CTTAM's notable practices and recent measures improving fair assessment and registration practice for internationally educated applicants (IEAs) include:

- offering a timely, cost-effective registration process for IEAs
- granting provisional registration for up to three years to IEAs academically qualified for designation but lacking sufficient professional experience. This provisional designation supports better recognition helpful to secure employment
- moving to recognise applicants assessed by Engineers Geoscientists Manitoba as professionally trained engineers as academically qualified for CTTAM's technologist designation
- adopting a progressive Competency Report Assessment Model that supports applicants providing evidence of qualification for professional work experience
- adopting Professional Certification Exams as a new pathway for IEAs to demonstrate qualification for the technologists designation
- work by Technology Professionals Canada and Technologies Accreditation Canada supporting the recognition of international qualifications. This includes developing the National Technology Benchmarks occupational standards document, the International Qualification Database and Engineering Technology Canada's gateway site for newcomer technicians and technologists
- adopting numerous mutual recognition, accords and reciprocity agreements that allow for membership transfers and the recognition of academic qualifications from numerous international jurisdictions
- improving website and registration material for IEAs and providing strong personal support and assistance for IEAs, including support for the jurisprudence exam preparation and professional orientation

## Fair Practice Analysis

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### I. Assessment criteria must be necessary – act, 8(4)

The criteria used in an assessment of qualifications must be necessary to assess competence in the practice of the profession.

With regard to substantive assessment criteria in a profession, for instance, the type and level of academic training required or the level of scrutiny brought to assess qualifications, FRPO recognises the authority of self-regulated professions setting these standards and will only question these requirements in the circumstance they are patently unreasonable. FRPO's evaluation focuses on the ways in which criteria and requirements may be unnecessary, unduly burdensome, or potentially result in forms of systemic discrimination, particularly as they may affect internationally educated applicants (IEAs).

### CTTAM's compliance to necessary assessment criteria

CTTAM's assessment criteria and various requirements for registration are for the most part warranted and necessary. FRPO identifies the following concern:

For both the technician and technologist designation, applicants must complete two years of qualifying work experience. For IEAs, foreign professional experience may be recognised, counting for up to one year of the two-year requirement. This means at least one year of Canadian work experience is mandatory.

A mandatory Canadian work experience requirement is unfair in circumstances where the applicant can provide evidence of having worked in a Canadian-like environment or evidence of experience that suggests they will be safe and competent working in the Canadian environment. In these circumstances, there is little need for the requirement.

FRPO recognises that this concern is mitigated both by CTTAM's progressive assessment policies — applicants working in their field unregistered in Canada prior to application can have this work considered toward meeting the one-year Canadian experience requirement — and as a right to title profession, applicants may not be blocked from employment without designation. Nonetheless, well-qualified applicants ideally should be recognised as such and not have registration delayed by an unnecessary requirement.

FRPO notes in this profession, a mandatory one-year Canadian work experience requirement is not uncommon among provincial regulators. However, the Ontario provincial regulator has recently removed this requirement and now register IEAs who can show evidence of competence in Canadian-like environments.

## II. **Duty to comply with domestic trade agreements – act, 4(1)**

A regulated profession must ensure that its registration practices comply with the obligations of a domestic trade agreement.

The Manitoba government has labour mobility obligations that extend to regulated occupations, under both Chapter 7: Labour Mobility of the Canadian Free Trade Agreement (CFTA) and Article 13: Labour Mobility of the New West Partnership Trade Agreement (NWPTA). In Manitoba, regulated professions are required to comply with labour mobility obligations under The Fair Registration Practices in Regulated Professions Act, section 4(1), The Labour Mobility Act, section 3(1) and for health professions, under The Regulated Health Professions Act, section 32(3).

In the regulated occupations, the purpose of these obligations is to provide labour mobility through license-to-license recognition. This needs to occur without any material requirements for training, experience, examinations or assessments — CFTA, Article 705, paragraph 1, NWPTA, Article 13, paragraphs 1 and 2.

### CTTAM's compliance to abide labour mobility obligations

CTTAM's labour mobility policy for individuals registered in other provincial jurisdictions applying for registration in Manitoba comply with provisions set out in the Canadian Free Trade Agreement and the New West Partnership Trade Agreement. FRPO identifies no issues of concern.

## III. **Notice of changes in registration practices – act, 5(2)**

A regulated profession that proposes to change its registration practices, as described in the information provided under clause (1)(a), must notify the director of the proposed change, at the time and in the manner and form required by the director.

The purpose of notification is to ensure FRPO has accurate, up-to-date information about the registration practices of Manitoba regulators. This supports FRPO's oversight role and allows for proactive discussion about the fairness of proposed changes.

### CTTAM's compliance to the duty to notify

In preparation for this registration review, FRPO requested updates regarding changes to assessment and registration practice.

CTTAM has updated FRPO regarding several policies. They have a history of notification and consultation with FRPO and continue to comply with this duty.

## Recommendations

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The Fair Registration Practices Office sees the following opportunity for Certified Technicians and Technologists of Manitoba to improve compliance to The Fair Registration Practices in Regulated Profession Act:

1. With regard to CTTAM's two-year professional experience requirement, remove the condition that one-year must occur in Canada.

## Regulator Action Plan

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In response to the recommendation made by the Fair Registration Practices Office, the Certified Technicians and Technologists of Manitoba committed to the following action plan:

Recommendation	Action(s)	Anticipated Completion Date
1. With regard to CTTAM’s two-year professional experience requirement, remove the condition that one-year must occur in Canada.	CTTAM to develop an optional International Educated Applicant Professional Practice Exam (IEA-PPE) to remove the condition of one-year relevant work experience in Canada.	December 2024

<b>Certified Technicians and Technologists of Manitoba</b> <b>Comments</b>
The IEA-PPE is an optional exam and would replace the requirement of one-year relevant Canadian work experience for CTTAM certification. Applicant would still require two-years of relevant International work experience.



## Compliance

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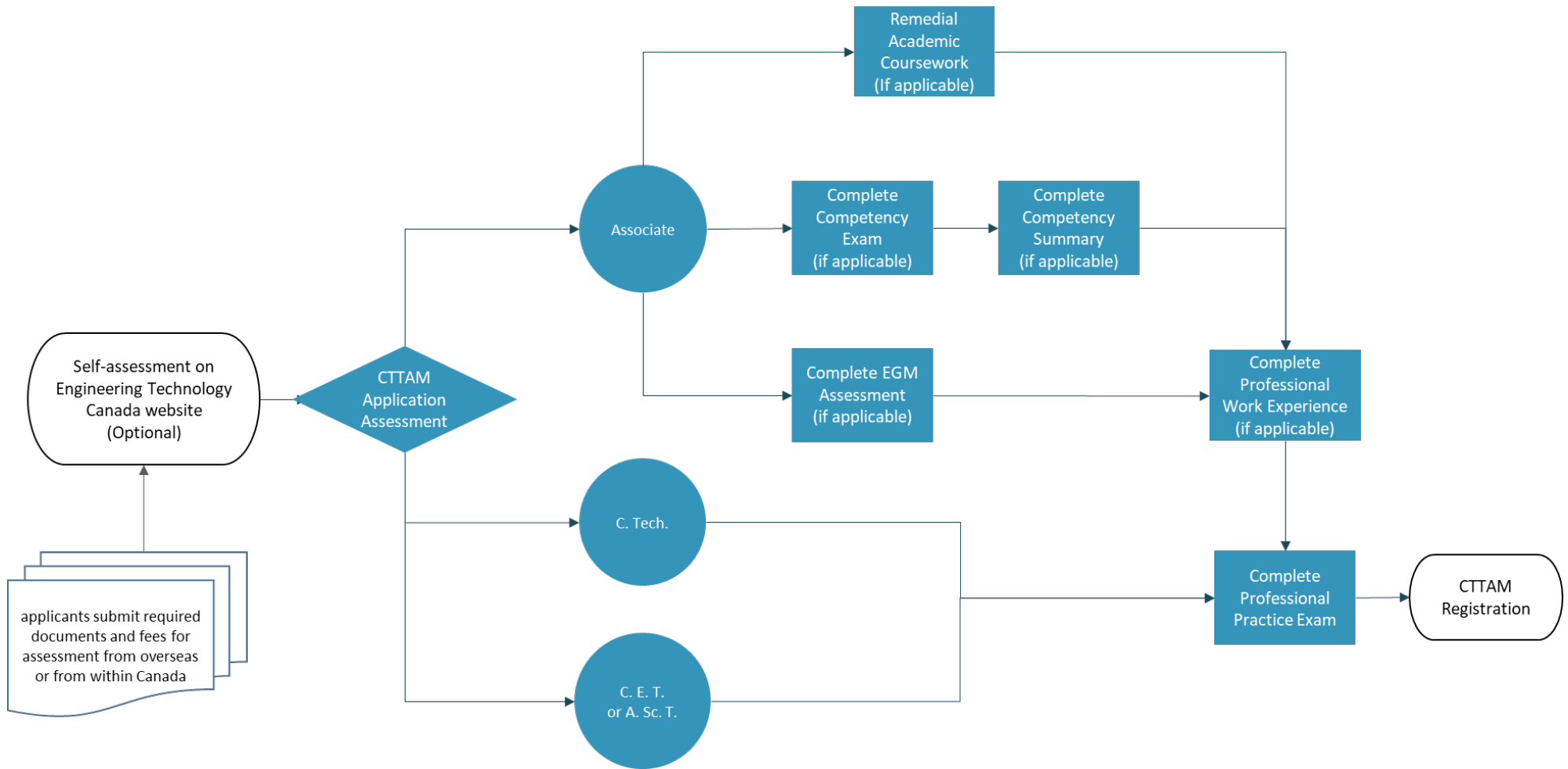
FRPO's 2022 registration review of the Certified Technicians and Technologists of Manitoba (CTTAM) examines their compliance to three duties in the Fair Registration Practices Code of the act; assessment criteria are necessary, labour mobility obligations are respected and FRPO is notified regarding changes in assessment and registration practice.

FRPO finds CTTAM compliant with the duty to abide labour mobility obligations and to notify FRPO regarding changes in assessment in registration practices.

FRPO raises a concern about CTTAM's mandatory one-year Canadian work experience requirement.

CTTAM's action plan commitment fully addresses this concern. The International Educated Applicant Professional Practice Exam (IEA-PPE) will be a useful option for well-qualified applicants seeking a more timely registration opportunity. This action helps ensure fair practice and better compliance to The Fair Registration Practices in Regulated Professions Act.

# Appendix 1



Certified Technicians  
and Technologists  
Association of Manitoba



**3,107**  
Registered  
Members

(As of December 2021)

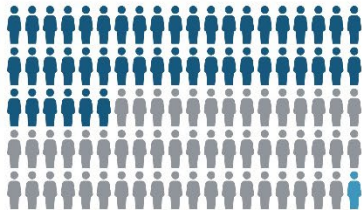
2011-2021 Internationally Educated Applicant Data



**843**

applications

Application Outcomes



registered - 46% | in process - 53% | file closed - 1%

Closed File Status



75%  
withdrawn



25%  
not approved



Top Countries of Education



applicants were educated in **62**  
different countries



Median Time to Registration

**79** days

2012-2021 Domestic Applicant Data



**1,592**

applications

**1,298 (82%)**

registrations