



## ARCHITECTURAL INSTITUTE OF BRITISH COLUMBIA

ARCHITECTURE CENTRE  
SUITE 100 - 440 CAMBIE STREET  
VANCOUVER, BC, CANADA V6B 2N5  
604/683-8588  
604/683-8568 FAX

Toll FREE IN BC 1/800/667-0753  
1/800/661-2955 FAX  
E-MAIL [aibc@aibc.ca](mailto:aibc@aibc.ca)  
INTERNET <http://www.aibc.ca>

# OPERATIONS BRIEFING NOTE – INFORMATION

## PREPARED AS INFORMATION FOR:

### Ministry of Advanced Education

**TITLE:** Request for *Architects Act* amendments to modernize qualifications for registration as an architect

## BACKGROUND:

1. Sections 36 and 37 of the *Architects Act* (the “Act”) establish the statutory registration qualifications for becoming an architect in British Columbia. These sections provide three streams for admission to the profession in BC:
  - a. Under section 36(a), via reciprocal registration (“reciprocity”) for architects registered in Canadian or other jurisdictions “where the architectural training required for admission is approved by the [AIBC] council”;
  - b. Under section 36(b), via an internship program which requires individuals, after graduation, to accumulate three years of experience in the employment or under the supervision of an architect; or
  - c. Under section 37, via the “alternative qualifications” route, by which individuals with 15 years of employment experience with an architect or eight years of practice as an architect outside BC may be considered for registration.
2. For many years, Canadian architectural regulators have sought to streamline and harmonize both the internship path for admission to the profession and the path for foreign-trained or foreign-registered architects. Since 1992, the Canadian Architectural Licensing Authorities (the “CALA”) have successfully operated a domestic reciprocity system. In 1994, the Committee of Canadian Architectural Councils (the “CCAC”) and the US National and National Council of Architectural Registration Boards (the “NCARB”) signed an Inter-Recognition Agreement to facilitate cross-border registration and practice.
3. More recently, two initiatives to further modernize and streamline the internship stream and the ability of foreign-trained architects to register in B.C. have come to fruition. These

initiatives, described briefly below, have highlighted the need to update the anachronistic registration language in sections 36 and 37.

#### CALA Internship in Architecture Task Force

4. In May 2011, the CALA Presidents met and approved recommendations for a revised Internship in Architecture Program (the “IAP”), which was approved by AIBC Council in August 2011. The key changes to the IAP were the shortening of the minimum internship period from three years (5600 hours) to two years (3720 hours) and to focus the internship experience on core aspects of architectural practice experience.
5. This important modernization of the IAP took years of research and consultation to consummate. One important finding during that period was that the sheer length of the average architectural internship was a significant obstacle to the ‘conversion rate’ of interns to architects. By removing some 1800 ‘discretionary’ hours from internship while tightening reporting rules and core experience expectations, the AIBC is of the view that the internship will be more relevant to professional practice and less of a hindrance to registration.

#### Broadly Experienced Foreign Architects (“BEFA”)

6. Five years ago, the AIBC embarked on an initiative to develop a competency-based assessment approach to the registration of foreign-trained architects. The BEFA program was brought to national attention through federal government funding in 2010, leading to cross-Canada adoption in 2012 by the CALA.
7. This alternative path to registration focuses on assessing the qualifications of internationally trained and licensed architects, not on an arbitrary number of years of experience. The BEFA program was recognized by the federal Minister of Human Resources and Skills Development as aligning with government’s interest in job creation, economic growth and filling skills shortages in key occupations.<sup>1</sup>

#### **DISCUSSION:**

1. The AIBC, as a public interest professional regulator, must balance the expectation that only qualified individuals are entitled to practise architecture with the modern reality of greater labour mobility, skills shortages and new approaches to internship and the assessment of qualifications.
2. The prior internship program saw interns continuing for an average of seven years prior to seeking registration. Many dropped out or sought alternative employment. Others

---

<sup>1</sup> “CALA Program Welcomes Foreign-trained Architects”, *Canadian Architect* September 22, 2012.

continued as 'career interns' with no prospect of becoming fully-fledged architects. The institute expects to see the average internship period drop considerably with the new IAP, and to see fewer interns, including women, lost to the profession during the internship experience.

3. Prior to the BEFA program, many very-qualified foreign-trained architects could not meet the arbitrary statutory experience requirements or simply elected not to attempt to register. A competency-based assessment program is a much more modern and sophisticated means of identifying qualified professionals and incorporating them into the B.C. workforce.
4. Through its long involvement with both the IAP modernization and the birthing of the BEFA program, the institute has monitored these important adjustments to the registration process and is confident that the integrity of registration and public assurance remains strong. In many ways, a younger (through shortened internship) and more diverse (through reciprocal and BEFA registration) membership strengthens the profession and the public's interest at the same time. Labour mobility, job creation and economic growth should be enhanced through barrier reduction, while the vibrancy of the profession should, over time, be assured.

## STRATEGIC ANALYSIS:

1. The national IAP and BEFA program have moved architectural registration in Canada to a more modern and relevant plane. In B.C., the *Architects Act* should not be an obstacle to public interest modernization.
2. With the change to a 3720-hour experience requirement, section 36(b) of the *Act* should be amended to accord with this national expectation. While section 36(2) provides AIBC Council with the ability to reduce the three year period to "not less than 2 years", a statutory change to reflect the modern, cross-Canada internship reality is timely. **A simple amendment that would allow the institute to adapt its registration criteria from time to time would be even more appropriate than a fixed numerical standard set by statute.**
3. Section 37 of the *Act* establishes fixed 15 or eight-year periods for employment or practice as the statutory "alternative qualifications" approach to architectural registration in B.C. The move to true competency-assessment under BEFA is another modernization step that should trigger an appropriate amendment. **Again, simple amendments that give the institute the discretion, through its elected and appointed Council, to establish qualification and admissions standards would seem most in keeping with modern professional regulatory trends.** See, for example, sections 16(c) of the *Health Professions Act*, RSBC 1996 c. 183.
4. Should the Ministry be open to considering a closely-related amendment, a provision in the *Act* to allow for "interjurisdictional cooperation" would be an appropriate addition (see

Section 20.4 of the *Health Professions Act* or sections 16 and 17 of the *Legal Professions Act*, SBC 1998 c.9). It is not clear whether a short section referring to the *Labour Mobility Act*, SBC 2009 c. 20, might be included (see section 18(2) of the *Accountants (Chartered) Act*, SBC 1996 c. 3, and the many other regulators' legislation affected by consequential amendment under the *LMA*).

## **FINANCIAL IMPLICATIONS:**

1. The primary financial implication to the IAP and BEFA program implementation to the AIBC has been operational, with many new applications to process. The introduction of a new Examination for Architects in Canada (first B.C. sitting took place in November 2013) has had a similar impact. The institute is equipped to handle the additional examination, assessment and administrative impact through appropriate cost-recovery and fee-setting means.
2. Given the prior implementation of both the IAP and BEFA, a statutory change to either reflect the current cross-Canada reality or to provide the institute with more general registration discretion should have no discernible financial impact.
3. More broadly, the facilitation of registration from interns and foreign-trained architects should lead to job creation and general economic growth. A larger professional tax base and employment anchor should, over time, have a meaningful impact provincially.

## **CONCLUSION:**

Simple amendment to the *Architects Act* to reflect the national IAP and BEFA program by providing a more flexible, modern registration authority to AIBC Council is in keeping with national trends and legislative modernization. Such changes should be non-controversial housekeeping matters appropriate for the miscellaneous statute amendment process.

---

<b>Responsible Executive:</b>	Thomas M. Lutes, Barrister & Solicitor
<b>Title:</b>	General Counsel, AIBC
<b>Telephone:</b>	604-683-8588, ext. 321
<b>Date:</b>	January 21, 2014