

CHAPTER 7: FACILITATING CREDENTIALS RECOGNITION AT FRONTLINE AGENCIES

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When the Canadian government breaks down barriers to foreign credential recognition, it facilitates the economic integration of those educated and experienced abroad. When the federal government conveys to provinces that foreign credentials must be properly recognized by implementing certain provisions in competition legislation, and when provincial governments attempt to aid such recognition through human rights laws or fair access legislation, the construction of mechanisms to facilitate the proper recognition of credentials and substantive competencies moves from simply being desirable to being necessary. Properly recognizing foreign credentials and competencies can be difficult and expensive. As a result, active and coordinated steps must be taken by the federal and provincial governments to provide mechanisms to perform accurate and consistent assessments of foreign academic credentials and of competencies obtained abroad.

This article considers relevant existing federal and provincial mechanisms, and opportunities to alter or expand these programs to improve their effectiveness. Important steps in the development and establishment of many facilitative mechanisms have been taken over the past decade, but there is room for continued improvement.

To promote the efficient and effective dissemination of pertinent information regarding foreign credential recognition and labour market integration to all newcomers:

- ***The Canadian Immigration Integration Program should continue to be expanded until it is available to virtually all immigrants before they arrive in Canada.***

To ensure fair and effective assessment of foreign credentials and competencies, and to provide adequate avenues to fill legitimate gaps in qualification:

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- *Federal and provincial governments should fund and facilitate the establishment of clinical assessment/Prior Learning Assessment and Recognition (PLAR) programs where required in the regulated occupations, preferably at the pan-Canadian level.*
- *Federal and provincial governments should continue to fund and facilitate the establishment of “bridging programs” to fill legitimate gaps where only partial qualification for certification in a regulated occupation is recognized.*

To promote fair, efficient, accurate, transparent and consistent assessment and recognition of academic credentials obtained abroad:

- *The Alliance of Credential Evaluation Services of Canada (ACESC) should consider loosening its membership criteria to allow any agency that assesses credentials to join. If this is done, then a framework to enforce compliance with a new pan-Canadian quality assurance framework for academic credential assessment should be considered. This could be done by requiring an assessment from an ACESC member for a foreign academic credential to be used to enter a regulated occupation in Canada.*

I. INTRODUCTION

The federal and provincial/territorial governments have made efforts to improve foreign credential recognition in Canada through several key initiatives. The provinces have constitutional jurisdiction over education and most regulated occupations,¹ but the federal government still has an important role to play in foreign credential recognition through immigration law and policy,² and by providing funding and helping to coordinate cooperative efforts across Canadian jurisdictions.

Recognizing foreign academic credentials is important in both regulated and non-regulated occupations. In non-regulated occupations, verification that a foreign academic credential is equivalent to a given Canadian one can provide an immigrant with important advantages in the labour market. In regulated occupations, not only is recognition advantageous, but possession of a certain academic credential is often legally mandated. These regulated occupations, however, present a more complex problem than simply accurately assessing and recognizing academic credentials. There are often examinations or other similar barriers required to gain entry to these occupations. These barriers, along with the required academic credentials, are intended to ensure safe and competent

¹ *Constitution Act, 1867* (UK), 30 & 31 Vict, c 3, s 92 reprinted in RSC 1985, App II, No 5 [*Constitution Act, 1867*].

² Justin Ikura, “Foreign Credential Recognition and Human Resources and Social Development Canada” (Spring 2007) *Canadian Issues* 17 at 17 (Lexis); see Chapter 5: Improving Foreign Credential Recognition through Reform to Immigration Law and Policy.

delivery of services to Canadians. However, these barriers are designed to assess recent graduates from Canadian institutions. For an immigrant who comes to Canada after practicing in his chosen occupation for many years, these requirements may not be appropriate or necessary to ensure public protection.

Immigrants who were trained abroad in occupations that are regulated in Canada have expressed a great deal of frustration with unnecessary or discriminatory barriers³ to these occupations. Some have been required to have their credentials assessed by multiple agencies or bodies, which significantly increased the time and cost of the process.⁴ Often, those trained abroad were required to take additional courses in order to obtain a licence, and many were unsure why this was required.⁵ This was especially pronounced in those who had already been practicing in a profession in another country, with one focus group participant stating “if I had known that I would have to study again the same courses that I studied 8 years ago, I wouldn’t have come.”⁶ Another participant said “everybody is talking about the shortage of engineers and doctors, but when you come you only find there are obstacles.”⁷ Another said:

There are many professionals with very good skills and knowledge in their specialties, but when they come, they are being assessed as a fresh medical graduate, that I don’t think is fair ... why not benefit from the experience of that person as a specialist?⁸

It is patently unfair to judge an experienced specialist in a profession on the same terms as someone who has recently completed studies at a professional school. A person could be an outstanding neurosurgeon and yet struggle to pass an examination that is partly based on material she has not studied in years. A person could be a renowned litigator, but still struggle to pass a bar exam after specializing in a certain area and spending years away from some of the material. For experienced practitioners, clinical assessment or Prior Learning Assessment and Recognition (PLAR) programs which judge the knowledge, competencies and skills that such a worker in Canada is expected to possess would be more appropriate than requiring these people to obtain licensure by overcoming the same barriers as new graduates. Such assessment programs may be difficult and expensive to establish and maintain. Where it is practical, it would be more

³ See Chapter 2: Effective Foreign Credential Recognition Legislation: Recommendations for Success; see also Chapter 1: Human Rights Legislation and the Recognition of Foreign Credentials.

⁴ Ontario, Office of the Fairness Commissioner, *Getting your professional license in Ontario: The experiences of international and Canadian applicants* (Toronto: RA Malatest and Associates, 2010) at 40, online: Office of the Fairness Commissioner <http://www.fairnesscommissioner.ca/en/downloads/PDF/Getting_Your_Professional_Licence_in_Ontario-The_Experiences_of_International_and_Canadian_Applicants.pdf>.

⁵ *Ibid* at 53.

⁶ *Ibid*.

⁷ *Ibid* at 78.

⁸ *Ibid* at 75.

efficient for the provinces and federal government to pool their financial resources and expertise to develop pan-provincial solutions to this issue.

The establishment and maintenance of facilitative mechanisms is an essential aspect of ensuring that those educated and experienced abroad are able to integrate economically as smoothly as possible. These mechanisms must include assessment and recognition of both academic credentials and substantive competencies. Because of the division of powers in Canada's constitution, a high level of cooperation is required between provinces, occupational regulatory bodies, academic credential assessment services, and the federal government.

II. THE FEDERAL GOVERNMENT'S CENTRAL INITIATIVES

Human Resources and Skills Development Canada (HRSDC), Citizenship and Immigration Canada, Health Canada and Service Canada all play important roles in the improvement of foreign credential recognition in Canada. These departments work with each other and in conjunction with provinces, territories and regulatory bodies that govern specific occupations.⁹ Well-coordinated and multi-faceted solutions are required to improve foreign credential recognition in Canada, and these solutions must involve numerous stakeholders.¹⁰ Because the constitutional division of powers delegates authority over education, the trades and most regulated professions to the provinces,¹¹ the federal government's initiatives in relation to foreign credential recognition are generally limited to establishing programs that provide funding for relevant projects, or that disseminate relevant information to those holding foreign credentials.

The Foreign Credentials Referral Office (FCRO)¹² was first launched in May 2007, with \$32.2 million in federal funding over its first five years.¹³ The FCRO's objective is to provide immigrants with information before they actually arrive in Canada.¹⁴ Information dissemination is important both for facilitating the economic integration of immigrants, and for allowing immigrants to make informed choices about coming to Canada in the first place. Although access to information is an integral part of effective foreign credential recognition,

⁹ Canada, Foreign Credentials Referral Office, *A Commitment to Foreign Credential Recognition* (Ottawa: Minister of Public Works and Government Services, 2010) at ii [FCRO].

¹⁰ See Appendix D, which summarizes several reports on the topic of foreign credential recognition.

¹¹ *Constitution Act, 1867*, *supra* note 1.

¹² See Appendix A for more information regarding the Foreign Credentials Referral Office.

¹³ Foreign Credentials Referral Office, New Release, "Canada's new government launches first phase of Foreign Credentials Referral Office" (24 May 2007) online: Foreign Credentials Referral Office <<http://www.credentials.gc.ca>>.

¹⁴ Jason Kenney, "Speaking Notes" (Speech delivered at the 12th Metropolis Conference, Montreal, Quebec, 18 March 2010), online: Citizenship and Immigration Canada <<http://www.cic.gc.ca>>.

information regarding how to access mechanisms that are sometimes inefficient and ineffective will be of limited value. While the FCRO has an important role to play, to maximize the effectiveness of information dissemination instruments, the facilitative mechanisms about which information is being dispensed must function in an effective way.

One specific information dissemination program is the Canadian Immigration Integration Program (CIIP). It is run by the Association of Canadian Community Colleges, and is funded by Citizenship and Immigration Canada;¹⁵ over three years (2010-2013), \$15 million has been established for this program.¹⁶ One of the reasons the CIIP is valuable to Canada is its role in improving foreign credential recognition.¹⁷ Currently, the program is delivered at three in-person at locations, in China, India and the Philippines.¹⁸ A fourth location will be added in the fall of 2011 in London, England. With the addition of the fourth location, the program will be available to 44% of immigrants in the provincial nominee immigration category, and 75% of immigrants in the federal skilled-worker category.¹⁹ The program is open to immigrants in “the final stages of the immigration process,” but before arrival in Canada.²⁰ The program consists of day-long seminar sessions about the “Canadian national economy and trends,” including issues with foreign credential recognition, and “[j]ob search techniques and tools.”²¹ There are also hour long one-on-one counseling meetings, during which an immigrant receives assistance in the creation of an individualized action plan to help with her economic integration.²²

HRSDC identified some needs of foreign trained people in 2010, one of which was “information, preferably before arriving in Canada, about the [foreign credential recognition] process,” and about what can be “realistically expect[ed] in Canada, both in terms of regulatory requirements and labour market

¹⁵ “What is CIIP”, online: Association of Canadian Community Colleges <<http://www.newcomersuccess.ca/>> [CIIP].

¹⁶ Citizenship and Immigration Canada, News Release, “Government of Canada to fund expanded overseas foreign credential recognition services in China, India, the Philippines and the United Kingdom” (18 February 2010) online: Citizenship and Immigration Canada <<http://www.cic.gc.ca>>.

¹⁷ “Why CIIP is Important to Canada”, online: Association of Canadian Community Colleges <<http://www.newcomersuccess.ca/>>.

¹⁸ Citizenship and Immigration Canada, *Leaders’ Roundtable on Immigration* (Saskatoon: Citizenship and Immigration Canada, 2009) at 17.

¹⁹ *Ibid.*

²⁰ CIIP, *supra* note 15.

²¹ The Association of Canadian Community Colleges, *Final Report – Canadian Immigration Integration Project (CIIP)*, (Ottawa: Association of Canadian Community Colleges, 2011) at 13-14, online: Foreign Credentials Referral Office <<http://www.newcomersuccess.ca/images/stories/2010-11-ciiip%20pilot-final%20project-report.pdf>>.

²² *Ibid* at 14.

prospects.”²³ The CIIP directly addresses these issues, and as a result it should continue to be expanded²⁴ until it is available to virtually all immigrants, in all immigration categories, who wish to participate. Because of the high cost of establishing new in-person centres everywhere they would be required, technology could be used to mitigate the cost of the program’s expansion. Online seminars could be hosted from a central location in Canada for those unable to travel to one of the four in-person locations. The one-on-one meetings could then be completed using web-chat software or the telephone.

The Foreign Credential Recognition Program (FCRP)²⁵ is another significant federal initiative intended to facilitate foreign credential recognition in Canada. Funding was first provided in 2003,²⁶ and the program is intended to ensure fair, accessible, coherent, transparent, and rigorous foreign credential recognition processes in Canada.²⁷ The FCRP provides strategic funding to “provincial and territorial partners and stakeholders, including regulatory bodies, sector councils and post-secondary educational institutions to develop systems and processes for assessing and recognizing foreign qualifications in targeted occupations and sectors.”²⁸ Numerous projects have been funded over the past several years, and some have substantially benefited foreign credential recognition in Canada.²⁹ It is important to have a program which can provide funding for projects that will improve foreign credential recognition processes in Canada. From the 2008-2009 fiscal year onwards, the FCRP will receive \$8 million each year in ongoing funding.³⁰

A review of the FCRP’s effectiveness was completed in 2010.³¹ In this review, project selection was questioned as it relates to achieving the FCRP’s medium-term goals,³² and there was a minimal amount of progress shown toward achieving its long-term goals.³³ While it is important for a program to be

²³ Human Resources and Skills Development Canada, *Summative Evaluation of the Foreign Credential Recognition Program*, (Gatineau, QC, Publications Services, 2010) at 27, online: Human Resources and Skills Development Canada <<http://www.hrsdc.gc.ca>> [Summative Evaluation].

²⁴ See House of Commons, Standing Committee on Citizenship and Immigration, *Recognizing Success: A Report on Improving Foreign Credential Recognition* (November 2009) (Chair: Dave Tilson) [Recognizing Success] (the expansion of the CIIP program was also recommended in this report). See also appendix D for more information on this report.

²⁵ See Appendix A for more information regarding the FCRP.

²⁶ “Foreign Credential Recognition”, online: Human Resources and Skill Development Canada <<http://www.hrsdc.gc.ca/>>.

²⁷ *Ibid.*

²⁸ “Foreign Credential Recognition Program”, online: Human Resources and Skills Development Canada <<http://www.hrsdc.gc.ca/>>.

²⁹ See Appendix A.

³⁰ Summative Evaluation, *supra* note 23 at 3.

³¹ See *ibid.*

³² *Ibid* at 34-37.

³³ *Ibid* at 38-40.

available to provide funding for projects used to improve foreign credential recognition in Canada, it must be ensured that the projects that are funded are likely to lead to practical and effective mechanisms to recognize foreign credentials and competencies.

A third major initiative from the federal government is the Internationally Educated Health Professionals Initiative (Health Professionals Initiative).³⁴ This program is part of a health human resource strategy, and is intended “to increase the supply of health professionals into the Canadian workforce.”³⁵ There is ongoing funding of \$18 million per year established for the program.³⁶ Examples of Health Professionals Initiative projects are present online,³⁷ and in “Pan-Canadian HHR Strategy Annual Reports.”³⁸ These examples reveal numerous projects with the potential to significantly contribute to increased numbers of foreign-trained health professionals working in various provinces and territories, and to improve the consistency in the assessment of internationally educated health professionals across Canadian jurisdictions.³⁹ One project in Nunavut was completed in 2009, and resulted in 23 internationally-educated nurses and one internationally-educated doctor attaining licensure and working in that jurisdiction. This project also resulted in “[i]mproved capacity to orient and support new [internationally-educated nurses] and increased ability to share experiences with other” northern regions looking to achieve similar results.⁴⁰ It is valuable to have a program which can effectively facilitate an increase in qualified medical personnel able to practise in Canada, and the Health Professionals Initiative appears to be achieving significant results. The ongoing funding for this program should be maintained as long as the need and demand for funding of these types of projects exists.

In addition to academic and competency-based recognition issues, one of the most common obstacles to labour market integration for immigrants is a lack of recognition of foreign work experience; such experience is often “almost completely discounted.”⁴¹ “Apprenticeships and internships” have been suggested to address this problem, “particularly in non-regulated occupations.”⁴² Some federal government departments (CIC and HRSDC) have developed

³⁴ See Appendix A for more information regarding the IEHPI.

³⁵ “Internationally Educated Health Care Professionals”, online: Health Canada <<http://www.hc-sc.gc.ca>> [Health Professionals].

³⁶ FCRO, *supra* note 10 at 13.

³⁷ Health Professionals, *supra* note 35.

³⁸ “Reports and Publications – Health Human Resources”, online: Health Canada <<http://www.hc-sc.gc.ca/index-eng.php>>.

³⁹ See especially “Health Human Resource Strategy and Internationally Educated Health Professionals Initiative 2008/09 Annual Report”, online: Health Canada <<http://www.hc-sc.gc.ca>>.

⁴⁰ *Ibid.*

⁴¹ Summative Evaluation, *supra* note 23 at 27.

⁴² *Ibid.*

internship programs aimed at new immigrants to assist them in attaining Canadian work experience.⁴³ These programs are currently done on a relatively small scale, but if expanded to other departments and to provincial government departments, they have the potential to have a more significant positive impact on labour market integration of immigrants in Canada. Another option that could be explored to make such internship opportunities available to significantly more immigrants was posited by the Parliamentary Standing Committee on Citizenship and Immigration.⁴⁴ It was suggested that incentives be created for private businesses to create short-term employment opportunities to provide newcomers with Canadian work experience.

While the federal government has clearly identified foreign credential recognition as an important issue both with words and action, there is room for continued improvement in the area. Through the Foreign Credentials Referral Office, the Foreign Credential Recognition Program, and the Internationally Educated Health Professionals Initiative, some progress has been made,⁴⁵ and by providing ongoing funding for these programs, the federal government has conveyed its desire and intention to improve credential recognition programs and mechanisms in Canada moving forward. The FCRP and Health Professionals Initiative in particular have important roles to play in terms of providing federal funding for the development of a variety of assessment and recognition tools, such as those discussed below.

III. PROVINCIAL GOVERNMENTS' EFFORTS

A. Overview

Provincial governments' efforts to facilitate foreign credential recognition generally take different forms than the federal government's funding and facilitative initiatives. The constitutional division of powers delegates different aspects of credential recognition to the jurisdiction of the provinces/territories and federal government.⁴⁶ The provinces and territories have jurisdiction over education and most regulated occupations,⁴⁷ which puts them in a position to impact foreign credential recognition with a relatively large amount of force and ease within their own jurisdictions. Provinces and territories seem somewhat reluctant to take the lead in assessing credentials and substantive competencies, perhaps because to facilitate effective foreign credential recognition processes, a

⁴³ Email from D. Kit, Ministerial Enquiries Division to Mark Melchers (10 June 2010). See Appendix A for more information on these internship programs.

⁴⁴ Recognizing Success, *supra* note 24 at 8.

⁴⁵ See Appendix A for more information.

⁴⁶ Ikura, *supra* note 2.

⁴⁷ *Ibid*; *Constitution Act, 1867*, *supra* note 1, s 92(13).

province would have to take on powerful regulatory bodies, some of which may not welcome such reforms.⁴⁸

Improving or establishing mechanisms to assess academic credentials, and especially mechanisms to assess clinical competencies, would be difficult and expensive, but there are relatively efficient ways to take such steps. An efficient way to develop mechanisms for the assessment of academic credentials and substantive competencies is for the federal and provincial governments to pool financial resources and expertise to develop national testing centres. It may be more efficient, for example, for colleges of physicians throughout Canada to agree on methodologies to test the competency of foreign-trained medical professionals, and establish several centres across the country where this can be done. This would require extensive negotiation among regulators, which may be complicated by disagreements over who should fund what. Apart from such collaboration, a particular province that wishes to move ahead and become a national leader in assessing credentials and testing competencies would likely find the investment well worthwhile. It would become the natural place in Canada for skilled immigrants to settle. Once these people have established homes, families, friends and professional networks, they would likely wish to remain in the province that facilitated their entry to their desired occupations.

HRSCD's 2010 evaluation of the Foreign Credential Recognition Program expressed that one of the needs of foreign-educated persons was "supports...to overcome gaps in credentials and knowledge;" one example provided of such support was "bridging programs."⁴⁹ Numerous "bridging programs" are in place in the provinces and territories.⁵⁰ They are meant to supplement education and training obtained abroad to bring one up to Canadian standards. It is important for the federal and provincial/territorial governments to provide adequate funding for the establishment and maintenance of such programs where there is a demand for them, because they provide an efficient route to labour market participation for those whose current credentials only partially meet Canadian standards. Where bridging programs are available, a person's existing competencies are respected and supplemented, as opposed to requiring a person to start over to become qualified to work in a given occupation. These programs must be coupled with sustained efforts to ensure that credentials and competencies are assessed accurately. Accurate assessment ensures that bridging programs are only utilized by those who have legitimate gaps in qualifications that need to be filled in order to provide services to Canadians in a safe and competent manner. These programs also require adequate capacities to meet the needs of those who wish to participate, and they should be offered at times that

⁴⁸ See e.g. "Competition Bureau Study Report – Study of Findings", online: College of Opticians of Ontario <<http://coptont.org>>.

⁴⁹ Summative Evaluation, *supra* note 23 at 27.

⁵⁰ See Appendix B for information about Bridging Programs.

will allow access for those who are already working in full time positions (for example on evenings and weekends).

With respect to bridging programs, the federal government recently announced the creation of a loan program “to help with tuition and training costs that are required to have foreign credentials recognized in Canada.”⁵¹ Sometimes the required bridging programs can cost immigrants a substantial amount of money, some as much as \$25,000, and this new program is intended to help immigrants who are unable to secure normal student loans or private other loans.⁵² This program has the potential to help immigrants enter their chosen fields, and signals the federal government’s continuing commitment to improving foreign credential recognition.

B. Foreign Credential Assessment and Recognition Performed by Occupational Regulatory Bodies⁵³

Occupational regulatory bodies often legally mandate which particular qualifications are required to work in the occupations they govern. Regulatory bodies frequently assess a person’s foreign academic credentials, and some also offer clinical assessment programs⁵⁴ to facilitate licensure. Such programs are particularly important for practitioners who are experienced abroad, or who obtained competency in a different way than the normal route taken in Canada. Assessing the knowledge and competence of such practitioners in a clinical setting is far more desirable and fair than requiring these people to pass examinations that are meant for new graduates in a field to obtain licensure. This is simply because experienced professionals, whether trained in Canada or abroad, may struggle to pass examinations that are partly based on material that a person has been away from for years. It is important for the federal and provincial governments to properly fund and facilitate the establishment and operation of such clinical assessment programs, because they allow for the fair and effective recognition of the foreign qualifications of experienced professionals.⁵⁵

Some regulatory bodies, such as the College of Optometrists of Ontario and the College of Dental Technicians of British Columbia, utilize the Prior Learning Assessment and Recognition (PLAR) approach “to evaluate the knowledge and skills of internationally trained applicants wishing to enter their professions.”⁵⁶

⁵¹ Allan Woods, “Tories promise loans to help immigrants upgrade skills, get credentials”, *Toronto Star* (6 April 2011).

⁵² *Ibid.*

⁵³ See Appendix B for information about some occupation-specific facilitative mechanisms run by regulatory bodies.

⁵⁴ See Appendix B for examples of some occupation-specific clinical assessment programs.

⁵⁵ See e.g. Manitoba’s International Medical Graduate programs in Appendix B.

⁵⁶ “Information on Prior Learning Assessment and Recognition in Canada”, online: Canadian Information Centre for International Credentials <<http://www.cicic.ca>>.

PLAR is a process used to assist “adults to demonstrate and obtain recognition for learning that they acquire outside of formal education settings.”⁵⁷ In PLAR, the knowledge and skills gained from experience, as opposed to the experience itself, are recognized. The focus of PLAR is “what the person knows and can do.”⁵⁸ PLAR is one approach that occupational regulatory bodies could utilize in place of normal entrance examinations in order to determine if someone with foreign experience meets relevant standards to gain certification in a given occupation. Various “benchmarks and principles of good practice [have been] established,” however there have not been any “widely accepted Standards of Good Practice in PLAR.”⁵⁹

A number of needs and challenges of occupational regulatory bodies have been identified by HRSDC. The main challenges faced by these bodies are a deficiency in understanding of foreign credential recognition in general, and the “need for improved processes to assess programs or educational/credit systems in other countries.”⁶⁰ Other specific needs of regulatory bodies include the need for “more capacity to undertake assessments,” and for “more tools and more sharing/closer collaboration among regulatory bodies and stakeholders.”⁶¹ It has been suggested that these issues could largely be addressed by the FCRP, and “greater attention to this stakeholder group may be beneficial.”⁶² This is an important realization, given the central role often played by regulatory bodies in foreign credential recognition. The federal and provincial governments should ensure that adequate funding and cooperative efforts are available for the establishment and maintenance of appropriate mechanisms for recognition of foreign credentials in the regulated professions at the pan-Canadian level. These mechanisms include bridging programs and clinical assessment or PLAR programs, but there is also an opportunity for regulatory bodies to contribute to and benefit from the wider credential recognition community, particularly with respect to assessment of academic credentials, as outlined below.

C. The Alliance of Credential Evaluation Services of Canada and Third Party Credential Assessment Agencies

The Alliance of Credential Evaluation Services of Canada (ACESC)⁶³ is made up of the five provincially mandated or recognized standalone credential

⁵⁷ *Ibid.*

⁵⁸ *Ibid.*

⁵⁹ “Recognition for Learning”, online: Canadian Association for Prior Learning Assessment <<http://recognitionforlearning.ca>> (CAPLA has conveyed an intention to develop such standards on their website).

⁶⁰ Summative Evaluation, *supra* note 23 at 25.

⁶¹ *Ibid.*

⁶² *Ibid.* at 25-26.

⁶³ “Alliance of Credential Evaluation Services of Canada”, online: Alliance of Credential Evaluation Services of Canada <<http://www.canalliance.org>> [Alliance].

assessment services.⁶⁴ Membership in ACESC is voluntary, and is available to any credential assessment service which meets ACESC's "quality assurance standards."⁶⁵ ACESC touts that membership in the Alliance is an "assurance of excellence". The Secretariat of ACESC is the Canadian Information Centre for International Credentials (CICIC).⁶⁶

In order to maintain membership in ACESC, a service must continuously meet all quality assurance guidelines, and proof that these guidelines are being met is based on each agency's self-evaluation.⁶⁷ These self-evaluations include "a review of assessment procedures, experience, file management, personnel qualifications, documentation methods and reference material base."⁶⁸

The five provincially mandated or recognized standalone credential assessment agencies that make up ACESC's membership⁶⁹ are Alberta's International Qualifications Assessment Service, British Columbia's International Credential Evaluation Service, Manitoba's Academic Credentials Assessment Service, Ontario's World Education Services Canada, and Quebec's Centre d'expertise sur les formations acquises hors du Quebec. There are two standalone agencies which are not provincially mandated or recognized, the Comparative Education Service, at the School of Continuing Studies, University of Toronto, and the International Credential Assessment Service of Canada, which is located in Guelph, Ontario.⁷⁰ The Governments of the Northwest Territories and of Saskatchewan provide assessments through an interprovincial agreement with the Government of Alberta. The International Qualification Assessment Service performs academic credential assessments for those jurisdictions.⁷¹ Canada's seven standalone credential assessment services perform approximately 48,000 academic credential assessments annually.⁷²

i. ACESC's Quality Assurance Framework

To attain and maintain membership in ACESC, several requirements must be met as part of compliance with the quality assurance framework. The services

⁶⁴ "Members of the Alliance", online: Alliance of Credential Evaluation Services of Canada <<http://www.canalliance.org>>.

⁶⁵ "Quality Assurance Framework", online: Alliance of Credential Evaluation Services of Canada <<http://www.canalliance.org>> [ACESC QAF].

⁶⁶ Alliance, *supra* note 63.

⁶⁷ *Ibid.*

⁶⁸ *Ibid.*

⁶⁹ See Appendix C for more information regarding the third-party credential assessment agencies.

⁷⁰ "Credential Evaluation, Assessment and Qualification Recognition Services", online: Canadian Information Centre for International Credentials <<http://www.cicic.ca>> [CICIC].

⁷¹ *Ibid.*

⁷² Council of Ministers of Education, Canada, *Pan-Canadian Quality Standards in International Credential Evaluation* (Toronto: Council of Ministers of Education, Canada, 2009) at 12 [Quality Standards].

must be operated, mandated or recognized by a province or territory.⁷³ The services rendered must be extended to “a broad-based clientele,” not just a single type of customer. For example, services cannot serve only a single profession. The service must also “provide multi-purposed assessments ... and cover a full range of countries of origin, disciplines, and levels of credentials.”⁷⁴ Members must also engage in “[c]ontinuous research” in order to ensure that all of the information required to assess a credential is available.⁷⁵ The employees who actually carry out the assessments must do so in a “fair and consistent” way. They must also possess at least a “bachelor degree or the equivalent,” and must have completed “a documented training program in educational credential assessment.”⁷⁶ All ACESC members are also required to comply with the “General Guiding Principles for Good Practice in the Assessment of Foreign Credentials.”⁷⁷

These and other standards must be met and complied with for at least one year, and the assessment service must have completed at least 250 assessments in that time to establish membership. The agency must then display conformity to these requirements “through the self-assessment survey process” to maintain membership.⁷⁸

ii. The General Guiding Principles for Good Practice in the Assessment of Foreign Credentials

The General Guiding Principles for Good Practice in the Assessment of Foreign Credentials (Guiding Principles) are not only followed by ACESC members, but are also voluntarily followed by Canada’s two other standalone assessment services, Comparative Education Service and the International Credential Assessment Service of Canada.⁷⁹ The guiding principles recommend, in a general way, what should be considered when performing an actual academic credential assessment, which documents are normally required, and what the ideal verification procedures for those documents should be.⁸⁰ The recommended processes are intended to ensure impartial and consistent assessments. It is specified that these processes should be reviewed regularly to eliminate “undue complications.”⁸¹ Additionally, assessment methods “should take into account the diversity of educational traditions in the world.”⁸²

⁷³ ACESC QAF, *supra* note 65.

⁷⁴ *Ibid.*

⁷⁵ *Ibid.*

⁷⁶ *Ibid.*

⁷⁷ *Ibid.*

⁷⁸ *Ibid.*

⁷⁹ CICIC, *supra* note 70.

⁸⁰ “General Guiding Principles for Good Practice in the Assessment of Foreign Credentials”, online: Canadian Information Centre for International Credentials <<http://www.cicic.ca>>.

⁸¹ *Ibid.*

⁸² *Ibid.*