

Continuing Professional Development Committee

PHASE 2 REPORT TO COUNCIL

RECOMMENDATIONS FOR A NEW CONTINUING EDUCATION PROGRAM

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GEOSCIENTISTS
BRITISH COLUMBIA

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RECOMMENDATIONS FOR A NEW CONTINUING EDUCATION PROGRAM

1.0 INTRODUCTION

Since early 2017, the Engineer's and Geoscientist BC Continuing Professional Development (CPD) Committee ("committee") has engaged in a staged process to revise the organization's current CPD program and create a new Continuing Education (CE) Program ([Figure 1: Continuing Professional Development \(CPD\) Committee Process – 2017 to 2020](#)).

In Phase 1 of this process, the committee explored and educated themselves about key issues related to continuing education programs for regulated professions.

The committee has now concluded Phase 2 of this process, for program development, where the committee used the learnings from the first phase to explore different options and make recommendations on the main components of the new CE Program.

This Phase 2 report to the Engineers and Geoscientists BC Council ("Council") provides a summary of the committee's process to date, details of the committee's Phase 2 recommendations for the new CE Program, other considerations for the new CE Program, and recommendations for next steps in Phase 3 of the process.

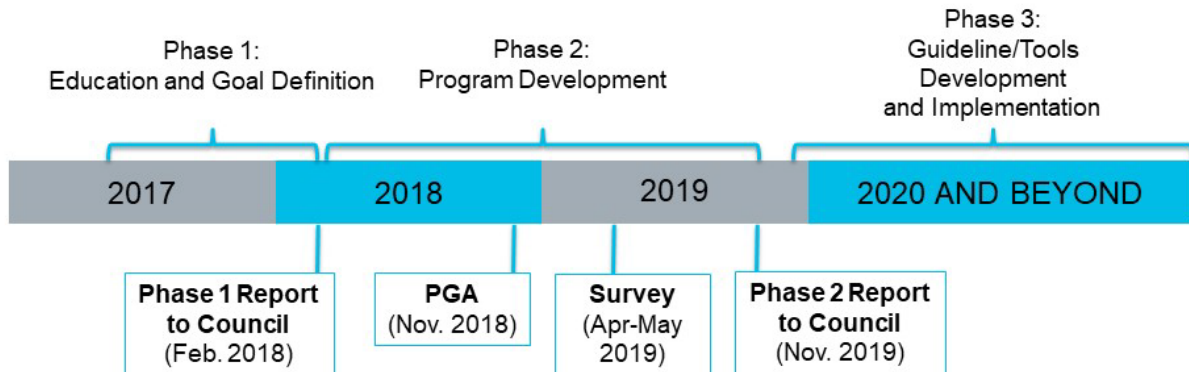


Figure 1: Continuing Professional Development (CPD) Committee Process – 2017 to 2020

Note: PGA – Professional Governance Act

In this report, there are two notable changes in terminology, which will be used going forward:

1. The current program is referred to as the "Continuing Professional Development program" ("CPD program"), whereas the new program will be referred to as the "Continuing Education Program" ("CE Program"). The change in language from "continuing professional development" to "continuing education" is aligned with the preferred language for similar programs under the new *Professional Governance Act* ("Act").

- Currently, there are multiple references in CPD program documents to “members” of Engineers and Geoscientists BC. Under the new *Act*, individuals registered with Engineers and Geoscientists BC must be referred to as “registrants” rather than “members.” The committee’s work during the previous phases for Education and Goal Development and for Program Development, including during consultation, used the term “members”; however, in this report and future phases, the term “registrants” will be used instead.

2.0 CPD COMMITTEE PROCESS

2.1 PHASE 1: EDUCATION AND GOAL DEVELOPMENT

In the first stage of Phase 1, the committee explored and educated themselves about key issues related to continuing education programs for regulated professions. The key learnings are summarized Table 1.

Table 1: Phase 1 Learnings

TOPIC	KEY LEARNINGS
Review of continuing education programs in other jurisdictions and professions	There are a variety of different approaches to continuing professional development programs and there is no research that any single jurisdiction has the “best” program. However, the program developed by Professional Engineers Ontario is unique and worth learning from.
Self-assessments	Professionals are poor at identifying their areas of weakness and prioritizing learning to correct these deficiencies. Self-assessment should be supplemented with peer review and/or oversight by the regulatory body. ^a
Right touch regulation	There is a need to understand and define the problem before developing a solution, and the committee should ensure the level of regulation is proportionate to the level of risk. The committee should look at all regulatory tools and processes to see how they all fit together.
Discipline trends	Many issues leading disciplinary cases have an ethical component.
Practice review and OQM audit findings	The majority of issues identified in practice reviews and Organizational Quality Management (OQM) audit findings relate to quality management, such as improper use of seal, not properly documenting checks of engineering and geoscience work, and not being aware of or meeting the intent of professional practice guidelines.
Direction on regulation of firms and OQM	The work of the committee and the Advisory Task Force on Corporate Practice are aligned, particularly regarding support for professional development as part of the three-pillar model. Continued communication and coordination between these two initiatives is important.
Legislative challenges and government expectations	The committee reviewed and discussed the primary role of Engineers and Geoscientists BC, the current legislative framework, the government’s expectations for Engineers and Geoscientists BC, and the organization’s registrant engagement strategy.

Note: OQM = Organizational Quality Management

^a Regehr G. 2017. Presentation to the Continuing Professional Development Committee. 28 November 2017.

In the second stage of Phase 1, the committee used the data gathered in the education stage, as well as information from previous consultations, to develop the following goals of the new CE Program:

1. Public safety
2. Public and government expectations
3. Registrant competence and confidence

The committee presented the results of Phase 1 in a report to Council in February 2018 and received endorsement to move on to Phase 2.

2.2 PHASE 2: PROGRAM DEVELOPMENT

Phase 2 focused on developing the components of the new CE Program. In this phase, the learnings from the first phase were used to explore different options and make recommendations on the main components of the new CE Program.

The second phase applied a structured decision-making (SDM) method to guide the committee's decision process for making recommendations on the new CE Program. This process was facilitated by an independent consulting firm, Compass Resource Management. SDM includes a set of principles and tools based on best practices from the field of decision analysis and group deliberation.

The SDM process, steps, and principles are listed below, with examples of the committee's activities undertaken at each step.

1. **Clarify decision context:** Have a common understanding of the decision context, including the problem, decision, and roles.
 - The committee discussed the goals and objectives of the new CE Program, to clarify the issues that the new CE Program would be intended to address.
2. **Define decision objectives:** Define decision objectives that focus on what matters.
 - The committee developed the principles that would be used to judge the components of the new CE Program.
3. **Develop alternatives:** Develop a range of alternative approaches for updating the new CE Program.
 - The committee developed alternatives for various program components, based on research of other continuing education programs from around the world.
4. **Characterize consequences:** Evaluate alternatives using best available information and acknowledge uncertainties.
 - The committee rated alternatives for various program components, based on how those alternatives met the principles of the new CE Program.

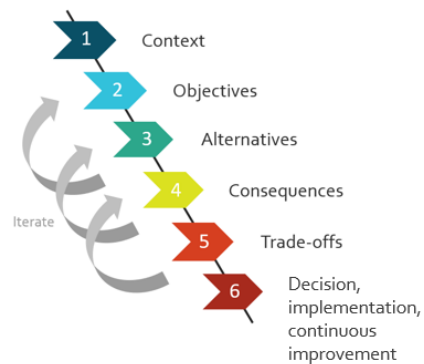


Figure 2: Structured Decision-Making Method

Adapted from: Gregory R., Failing L. 2012. Structured Decision Making. NJ: Wiley-Blackwell.

5. **Deliberate on trade-offs:** Make trade-offs among alternatives explicit, discuss the importance of these trade-offs, and consider feedback from registrants and stakeholders.
 - The committee debated the leading alternatives for program components, using consultation results and research completed by Engineers and Geoscientists BC staff as supporting information.
6. **Decide, implement, and review:** Strive for consensus within the committee on a recommended approach to the new CE Program, advise on implementation given uncertainties in performance, and review for continuous improvement.
 - The committee finalized consensus recommendations through discussion.

2.2.1 RECENT CONSULTATION

Over the last decade, Engineers and Geoscientists BC has carried out several consultative processes on the current CPD program and future requirements. In Phases 1 and 2, the committee reviewed the results of previous consultations to help inform the decision-making process.

In April and May 2019, Engineers and Geoscientists BC led a new consultation with registrants on the components of the new CE Program with guidance from the committee. The main activity in this consultation was a survey of registrants. Other activities included communications via updates to the Engineers and Geoscientists BC website and through eNews.

In the survey, registrants were informed of the context of the new CE Program within the new *Act* and were asked for feedback on the decision objectives and alternative approaches for updating the CE Program. Over 2,900 registrants participated in this survey, representing approximately 8% of the current 37,000 registrants. The full Consultation Summary Report is provided in Appendix 1 (see [Section 6.0 Appendix](#)) and key findings from this consultation are provided throughout this report.

2.2.2 STEP 1: DECISION CONTEXT AND THE *PROFESSIONAL GOVERNANCE ACT*

At the beginning of the Phase 2 process, the Professional Reliance Review was still ongoing and the government had not yet passed the new *Act*. The passing of the *Act* in November 2018 significantly changed the context for the new CE Program.

Section 22 (2)(g) of the *Act* requires regulatory bodies, including Engineers and Geoscientists BC, to “establish and maintain a continuing competency program to promote high standards among registrants.” Section 57 (1) of the *Act* also states that each regulatory body must make bylaws establishing the following:

- (e) continuing education programs or requirements for qualified continuing education for individual registrants, which programs or requirements may be different for different specializations;
- (f) continuing education programs or requirements that support reconciliation with Indigenous peoples in British Columbia; [and]
- (g) continuing education programs to be provided by registrants that are firms.

The government regulations that will guide the program requirements are expected to be introduced over the next few years. It is understood that the regulations will make this continuing competency program mandatory for all registrants, but the timeline for making the program mandatory is still unknown. The committee's current work in developing the new CE Program will help to position Engineers and Geoscientists BC to advise government on what will work best to protect the public once this section of the *Act* is brought into force.

The main implication of the *Act* for the new CE Program is that the introduction of a mandatory program would no longer have to be approved by a bylaw vote of two-thirds of registrants of Engineers and Geoscientists BC. Under new regulation enabled by the *Act*, Council is expected to have the ability to pass bylaws affecting registrants without requiring a registrant vote.

2.2.3 STEP 2: DECISION OBJECTIVES

An early step in Phase 2 was defining the important considerations for developing the new CE Program. These were called "decision objectives" and were used as criteria by which alternative approaches to updating the CE Program were evaluated.

The six decision objectives used by the committee to develop the new CE Program are listed below, along with discussions of their relative importance in guiding committee recommendations.

1. Help professionals maintain competency in their scope of practice

- The duty of Engineers and Geoscientists BC is to uphold and protect the public interest regarding the practice of professional engineering and geoscience. Setting and maintaining high standards for competency of registrants is the primary way Engineers and Geoscientists BC addresses this duty and, as such, this goal is featured as one of the three pillars of Engineers and Geoscientists BC's current strategic plan.
- In the case of the new CE Program, competency is defined as "the ability to perform the tasks and roles of an occupational category to standards expected and recognized by employers and the community at large."

2. Maximize simplicity and flexibility for registrants

- The word "simplicity" in this decision objective refers to the ease with which registrants understand their CE Program requirements and can implement them.
- The word "flexibility" refers to the degree to which the new CE Program recognizes and accommodates the unique circumstances of Engineers and Geoscientists BC's diverse registrants.

3. Minimize administrative cost to Engineers and Geoscientists BC

- Achieving benefits for the public, professions, and registrants while minimizing administrative costs is important across all of Engineers and Geoscientists BC's programs.
- The administrative cost of a CE Program is largely a factor of the support staff required to run the program, the cost for any web-based supporting tools, and the frequency and scope of program evaluations and updates.

4. Ensure the program is verifiable, enforceable, and transparent

- Over and above the performance of a CE Program in helping professionals maintain competency, the government and public also expect a CE Program to adhere to best

practices, including requirements that a program be verifiable, enforceable, and transparent, as follows:

- **Verifiable:** Engineers and Geoscientists BC can check that practising registrants are meeting their CE Program requirements.
- **Enforceable:** Requirements are sufficiently verifiable to support disciplinary action if Engineers and Geoscientists BC believes that CE Program requirements are not being met.
- **Transparent:** The public can see whether a practising Engineers and Geoscientists BC registrant is meeting CE Program requirements.

5. Encourage professionals to give back to and advance the professions through volunteering and mentorship

- A CE Program can contribute to advancing the engineering and geoscience professions through encouraging volunteering (e.g., volunteering with Engineers and Geoscientists BC to contribute to the self-regulation of the professions) and mentoring (transferring knowledge and skills to the next generation of professionals).

6. Align with Engineers and Geoscientists BC's other regulatory programs

- All of Engineers and Geoscientists BC's regulatory programs contribute to the ultimate duty of Engineers and Geoscientists BC to uphold and protect the public interest regarding the practice of professional engineering and geoscience. Alternative CE Program approaches need to be evaluated both in terms of how well they complement other regulatory programs for individual professionals, as well as their consistency with the Regulation of Firms model.

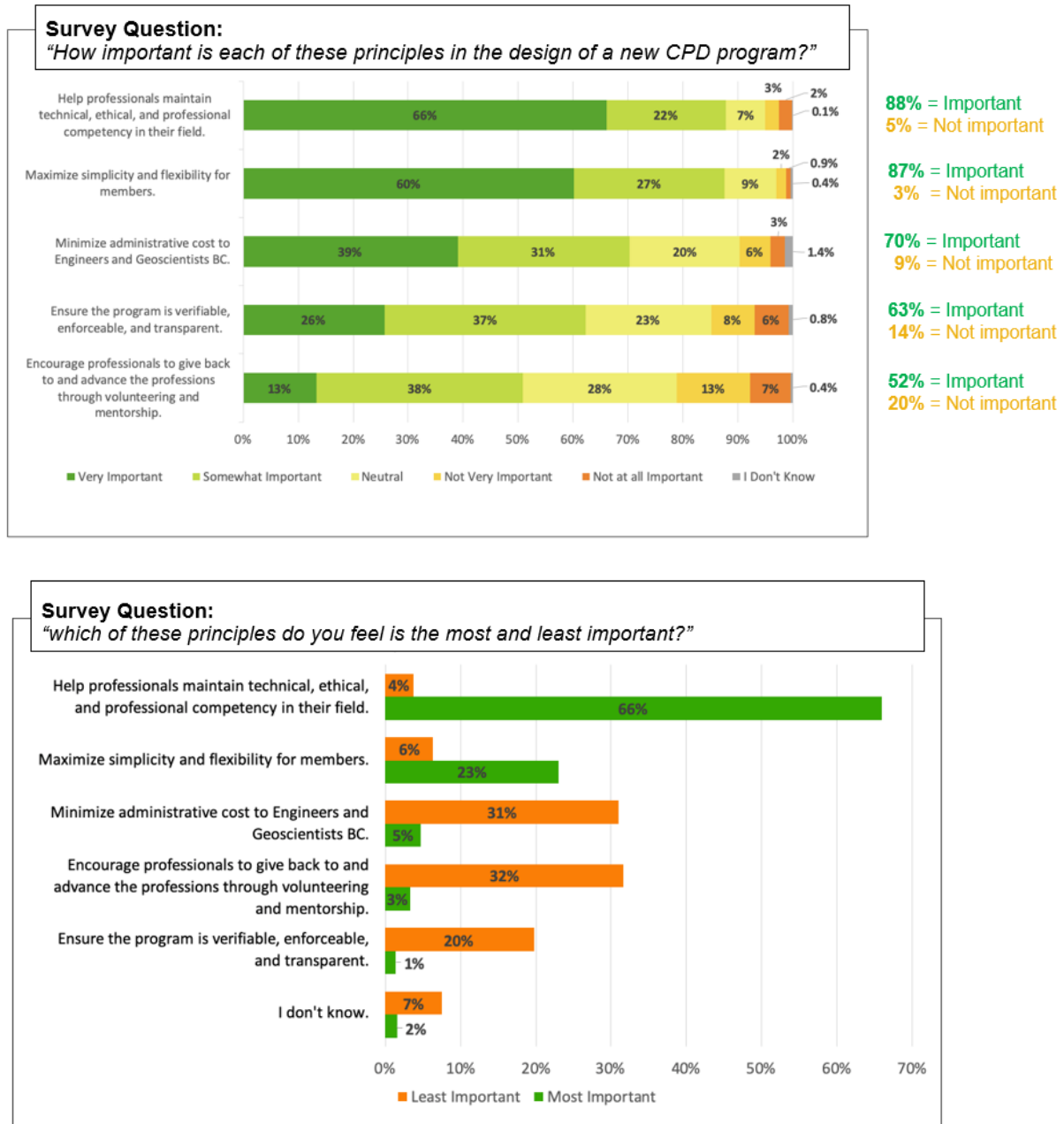
In the 2019 survey of registrants to inform the Phase 2 CE Program development process, the first five¹ of these decision objectives were framed as “guiding principles for the update of the CPD program” and registrants were asked the questions: *“How important is each of these principles in the design of a new CPD Program?”* and *“Which of these principles do you feel is the most and least important?”*.

Following is a summary of the survey results, which are illustrated in Figure 3 below:

- A majority of respondents think all of the first five of these principles are “very important” or “somewhat important.”
- Results indicate that the first two principles on (1) competency and (2) simplicity and flexibility are the most important across respondents.
- When respondents were asked to choose which was the most important principle, the first principle on maintaining competency was chosen by the greatest number of respondents (66%) followed by the principle on maximizing simplicity and flexibility (23%).
- The principles chosen as “least important” by the greatest number of respondents were the third principle on minimizing administrative cost (31%) and the fifth principle on volunteering and mentorship (32%).

¹ Note: The last decision objective (“Align with Engineers and Geoscientists BC's other regulatory programs”) was not included in the survey, to decrease the effort and time required to complete the survey and focus attention on questions that the committee thought would be of most value for feedback.

Figure 3: 2019 Survey Results on the Importance of Each Guiding Principle



The survey results show that some of the same areas of agreement are exhibited both across survey respondents and among the committee members. For instance, all committee members recognize that the most important purpose and contribution of the new CE Program is to help professionals maintain competency in their scope of practice. As well, all committee members recognize the importance of maximizing simplicity and flexibility for registrants. At the same time, committee members recognize that while all of these principles are important considerations for the new CE Program, they cannot all be optimized and trade-offs must be made. For example, some alternative approaches to a CE Program might help professionals maintain competency but they

may not be flexible and/or simple. While the committee members have looked for “win-win” approaches that help maintain competency while being flexible and/or simple, many approaches do involve trade-offs; in these cases, the committee deliberated and exercised their professional judgment to determine which trade-offs would be reasonable and which unreasonable.

2.2.4 STEPS 3 TO 5: ALTERNATIVES, CONSEQUENCES, AND TRADE-OFFS

The committee considered alternative approaches to updating the CE Program across the following main components of the program:

1. **Application/Exemptions:** Who does the CE Program apply to and who is exempt?
2. **Continuing Education (CE) Quality :** What types of activities count for the purposes of the CE Program? Are any specific types of activities required under the CE Program?
3. **CE Quantity:** How much continuing education must registrants do?
4. **CE Documentation:** What types of documentation must registrants maintain with respect to the CE Program?
5. **CE Reporting:** How will registrants demonstrate compliance with the CE Program?
6. **CE Enforcement:** How will the CE Program be enforced?
7. **Regulation of Firms Program:** How should the CE Program be integrated with the new Regulation of Firms Program?

For each of the above components, the committee identified a range of alternative approaches that were worthwhile to consider. These alternatives were both a mixture of new approaches developed by the committee and approaches applied in BC and other jurisdictions.

Over the course of nine months (November 2018 to August 2019), the committee identified alternatives, characterized the expected consequences of each alternative, deliberated on trade-offs, and sought agreement on a recommended approach for each component.

The effects of various approaches to continuing education programs are generally not well studied in terms of their effectiveness at helping professionals maintain competency.² Whenever possible, the committee used available studies to inform the characterization of consequences, but the committee also often had to rely on their own judgment and experience to fill gaps. Where the committee’s collective knowledge and experience was not sufficient, they took into account that the performance of some alternatives was uncertain.

2.2.5 STEP 6: DECIDE AND IMPLEMENT

The committee sought consensus decisions on all recommendations to Council in this Phase 2 Report, where consensus means that no one member opposed the recommendation.

The recommendations in the next section represent the consensus recommendations of the committee. If accepted by Council, these recommendations will become the basis for writing the new Continuing Education Bylaw and the *Continuing Education Guideline*. These recommendations provide the broad outline for the new CE Program and the *Continuing Education Guideline* will provide more details on how the new CE Program will be implemented.

² Continuing education programs for regulated professions are largely based on precedents established by existing programs in other jurisdictions or by organizations such as the Professional Standards Authority.

3.0 RECOMMENDATIONS FOR A NEW CONTINUING EDUCATION PROGRAM

3.1 OVERVIEW: A COMPETENCY-FOCUSED, RISK-INFORMED, AND PROACTIVE APPROACH TO CONTINUING EDUCATION

The committee's recommendations for the new CE Program have been broadly influenced by a few key ideas on how to best design and implement a CE Program for engineering and geoscience professionals:

- **Competency-focused:** The primary purpose of the CE Program is to help professionals maintain competency in their scopes of practice.
- **Risk-informed:** Requirements within a CE Program need to be informed by, and focused on, requirements that will reduce risk to the public and the environment.
- **Proactive:** The purpose of requirements within a CE Program is to create a culture of learning and to promote good practices for maintaining competency.

This approach is discussed more below and has emerged largely from the committee's deliberations and understanding of the possibilities and limitations of what can be achieved through a CE Program.

3.1.1 COMPETENCY-FOCUSED APPROACH

The primary purpose of the new CE Program should be to support registrants in maintaining competency in their professional practices, where the term "competency" is defined as "the ability to perform the tasks and roles of an occupational category to standards expected and recognized by employers and the community at large" (as per Engineers and Geoscientists BC's Competency Framework). Maintaining competency is directly related to a registrant's ability to meet the first principle of the Code of Ethics, which states that registrants "shall hold paramount the safety, health and welfare of the public, the protection of the environment, and promote health and safety within the workplace."

Importantly, while the CE Program should support registrants in maintaining competency, it is not the only way that Engineers and Geoscientists BC supports this objective. Engineers and Geoscientists BC regulates the practice of individual professional engineers and geoscientists through mechanisms such as:

- setting minimum standards for entry into the professions;
- assessing applicants to ensure they have met these minimum qualification standards before being licensed to practice;
- receiving and dealing with complaints against practitioners and disciplining those who do not comply with the basic standards of skilled and ethical practice;
- developing quality management guidelines and professional practice guidelines; and
- undertaking audits and practice reviews as a proactive quality assurance check on the practices of individual professionals.

In addition to these regulatory mechanisms for individual professionals, Engineers and Geoscientists BC will also soon be implementing a comprehensive Regulation of Firms Program that will apply to most entities that practice professional engineering and geoscience in BC, including sole practitioner entities.

A competency-focused approach to the CE Program is a modification to the current Engineers and Geoscientists BC's *Continuing Professional Development Guideline*, which identifies maintaining competency as one of many benefits of continuing education. Other benefits emphasized in the current guideline include:

- fostering excellence in the professions;
- enhancing and/or expanding the domain of practice;
- enhancing professional image;
- facilitating practice mobility;
- facilitating upward movement in the value chain to clients and employers; and
- improving marketability.

While all of these benefits are indeed good for individuals and the reputation of the professions at large, having the CE Program focus on the achievement of these benefits may be beyond the regulatory duty of Engineers and Geoscientists BC. At the very least, by including these goals, registrants may confuse the primary duty of Engineers and Geoscientists BC—to uphold and protect the public interest—with putting the priorities of registrants first. The Professional Reliance Review and the introduction of the new *Act* have re-emphasized that Engineers and Geoscientists BC's focus should be on this primary duty of protecting the public interest, and that other functions, such as advocacy and promoting career advancement, are of lower priority.

Within this new regulatory context, the committee believes that the new CE Program needs to be focused on setting a minimum bar for continuing education that is guided by the primary purpose of supporting registrants to maintain their competency.

3.1.2 RISK-INFORMED APPROACH

A risk-informed approach for the new CE Program means designing a program that considers risks to the public and the environment, and considers the links between those risks and professional competency.

The committee has taken a risk-informed approach to the new CE Program in three respects by:

1. reviewing the available evidence for what aspects of competency have posed the greatest risk to the public and environment through a review of disciplinary cases;
2. developing requirements and guidance in the new CE Program to support registrants in addressing the risks of their practice to the public and the environment; and
3. where there was no clear link between a reduced risk to the public and the environment and a potential CE Program requirement, in most cases, opting to not recommend this requirement within the CE Program in favour of enhancing the flexibility and simplicity of the CE Program for registrants.³

³ For example, several alternatives were ruled out for the CE Quality, CE Documentation, and CE Reporting components, because it was not clear enough that they would contribute to helping professionals maintain competency, and because they were not flexible and/or simple. In the presence of uncertain benefits for reducing risk to the public and the environment, and certain drawbacks for flexibility and/or simplicity, the committee, in most cases, decided against an alternative.

By following this approach, the committee determined that the new CE Program will attempt to address any risks that can be mitigated by meeting CE Program requirements, while keeping the new CE Program simpler and more flexible than the current CPD program. This balance is in keeping with the concepts of right touch regulation that the committee learned about in Phase 1. The concept of right touch regulation includes the idea that a regulatory program should be “based on a proper evaluation of risk, proportionate, and outcome-focused” and that a program, in this case the new CE Program, is only one tool in a suite of regulatory programs. The new CE Program must be designed to work in harmony with those other programs and should not try to solve problems that are better addressed through other regulatory mechanisms.

3.1.3 PROACTIVE APPROACH

Generally speaking, regulatory programs for professionals can apply two types of broad strategies for increasing compliance with their requirements: a proactive strategy or a punitive strategy. In fact, many regulatory programs strike a balance between applying proactive and punitive approaches to encourage compliance.

The underlying assumption in a proactive strategy is that most professionals want to follow regulatory requirements, but a key hurdle is sufficient understanding, know-how, and simplicity of programs. Based on this assumption, a key role of the regulatory body is to proactively communicate with professionals to promote compliance, and to verify compliance through audits or reviews that are seen by professionals as learning opportunities rather than opportunities to penalize professionals for not understanding the requirements.

In contrast, a punitive strategy assumes that a significant number of professionals will not comply with requirements unless there is a reasonable probability that their non-compliance could be discovered by the regulatory body. Based on this assumption, a key role of the regulatory body is to implement strict methods to independently verify compliance that do not rely on the honesty of the professional.

For any given regulatory program or requirement within a regulatory program, the balance between a proactive strategy and punitive one will often depend on:

- how critical a given program and/or requirement is for preventing harm to the public and the environment; and
- how effective either strategy is expected to be in achieving the ultimate goal of a program (which is often much broader than the specific individual requirements within a program).

Notably, a common trade-off when implementing a more punitive strategy is that requirements become more complex and less flexible to individual circumstances.

In the case of continuing education programs, the committee believes that taking a proactive approach will result in better outcomes for advancing the ultimate purpose of the program: to help professionals maintain competency in their scope of practice and avoid harm to the public and the environment caused by a lack of competency.

Since the requirements in a proactive approach can be simpler and more flexible, there is more room to promote a culture of learning and competency. For instance, in communications about the new CE Program, instead of spending time explaining strict and detailed requirements, communications can focus more on promoting key messages and tools that will be more effective at helping professionals maintain competency.

3.2 RECOMMENDATIONS

The committee's recommendations to Council address the following main components of the new CE Program:

1. **Application and Exemptions:** Who does the CE Program apply to and who is exempt?
2. **Continuing Education (CE) Quality:** What types of activities count for the purposes of the CE Program? Are any specific types of activities required under the CE Program?
3. **CE Quantity:** How much continuing education must registrants do?
4. **CE Documentation:** What types of documentation must registrants maintain with respect to the CE Program?
5. **CE Reporting:** How will registrants demonstrate compliance with the CE Program?
6. **CE Enforcement:** How will the CE Program be enforced?
7. **Regulation of Firms Program:** How should the CE Program be integrated with the new Regulation of Firms Program?

If supported by Council, these recommendations will become the basis for writing a new *Continuing Education Guideline*, which will be the committee's next step in implementing the new CE Program.

3.2.1 SUMMARY OF RECOMMENDATIONS

The table below summarizes the committee's recommendations to Council. Topics and numbers correspond to the list above, and details are provided in the following sections.

Table 2: Summary of Recommendations to Council

TOPIC / NUMBER	SUMMARY OF RECOMMENDATION
1. APPLICATION AND EXEMPTIONS	
1a	<i>Application:</i> The CE Program is mandatory for practising registrants (P.Eng., P.Geo., Eng.L., Geo.L.).
1b	<i>Application:</i> The CE Program is optional for registrants with non-practising or retired status, except for meeting the CE Program's ethical and regulatory learning requirement every 3 years.
1c	<i>Exemptions:</i> The CE Program is optional but encouraged for registrants-in-training. Council should consider options to mitigate the risk of the use of EIT or GIT designations beyond the expected period, including the possibility of trying to avoid CE Program requirements.
1d	<i>Exemptions:</i> Registrants can apply for an exemption on a yearly basis for parental, medical, or compassionate care leave, or for other extenuating circumstances.
2. CE QUALITY	
2a	Registrants must meet a minimum amount of CE hours per year. Registrants must be able to demonstrate relevance of their CE activities in an audit or practice review.
2b	Registrants are encouraged to identify relevant areas of learning, choose best avenues of learning for themselves, and seek input from peers and/or their employers.
2c	All practising registrants must complete ethical and regulatory learning every year.

TOPIC / NUMBER	SUMMARY OF RECOMMENDATION
3. CE QUANTITY	
3a	Required CE hours must be met on a 3-year rolling basis.
3b	A total of 60 hours of CE are required during each 3-year rolling period.
3c	Professional practice will no longer count toward CE hours. The required number of CE hours have been reduced compared to the previous <i>Continuing Professional Development Guideline</i> , to account for this change.
4. CE DOCUMENTATION	
4a	All practising registrants must have a CE plan and a record of CE hours and activities and must update these each year. Engineers and Geoscientists BC would provide templates and tools, but using them would not be mandatory.
4b	CE plans must meet specific minimum requirements, including that they: <ul style="list-style-type: none"> • define a registrant's scope of practice, including any anticipated or desired changes; • characterize the risks of their practice to the public and/or the environment; • outline learning goals and priorities; and • identify the activities that they will do to advance their learning goals and priorities, including how they will meet the requirements for ethical and regulatory learning.
4c	Registrants would be required to maintain CE documentation for a minimum of 4 years and have evidence available for review in the event of an audit or practice review.
5. CE REPORTING	
5	Practising registrants must report CE hours and learning activities and upload their CE plan yearly.
6. CE ENFORCEMENT	
6a	Engineers and Geoscientists BC should follow standard, established procedures for enforcement, with respect to the CE Program.
6b	CE documentation should be evaluated during audits, practice reviews, and investigations to determine compliance.
7. REGULATION OF FIRMS	
7a	Registrants are accountable for fulfilling CE Program requirements on an individual basis.
7b	The committee supports the intent that firms support their professionals in meeting their individual CE requirements. The Regulation of Firms Advisory Group should further clarify the various mechanisms of support that would be acceptable.

3.2.2 RECOMMENDATION 1: APPLICATION AND EXEMPTIONS

Recommendations 1a to 1d address two key questions: *Who does the CE Program apply to and who is exempt?* The committee's rationale for each recommendation appears below.

Recommendation 1a

The committee recommends that compliance with the requirements in the CE Program is *mandatory* for practising registrants with the following professional designations:

- Professional registrants: P.Eng., P.Geo.
- Licensees: Eng.L., Geo.L.

Recommendation 1b

The committee recommends that the CE Program is *optional* for registrants with non-practising status, except for meeting the CE Program's mandatory ethical and regulatory learning requirement every 3 years. This applies to registrants with the following professional designations:

- P.Eng. (Non-practising), P.Geo. (Non-practising), Eng.L. (Non-practising), Geo.L. (Non-practising)
- P.Eng. (Retired), P.Geo. (Retired), Eng.L. (Retired), Geo.L. (Retired)

See also [Box 1: Definition of Non-practicing Status](#) below.

Recommendation 1c

The committee recommends that CE Program is *optional but encouraged* for registrants-in-training with the following professional designations:

- Engineer-in-Training (EIT), Geoscientist-in-Training (GIT)

The committee recommends that Council consider options to mitigate the risk of the use of EIT or GIT designations beyond the expected period, including the possibility of trying to avoid CE Program requirements.

Recommendation 1d

The committee recommends that the following registrants can apply for an exemption to the CE Program on a yearly basis:

- Registrants on parental leave
 - Registrants on medical leave
 - Registrants on compassionate care leave
 - Other registrants with extenuating circumstances that inhibit their ability to meet their CE Program requirements
-

RATIONALE: Recommendations 1a and 1b

The following rationale addresses the question: *Why apply different approaches for practising and non-practising registrants?*

Recommendations 1a and 1b are based on a risk-informed approach, in that practising registrants pose significantly more risk to the public and the environment than non-practising registrants; therefore, the CE Program should focus on practising registrants.

However, non-practising registrants should still be required to complete the mandatory ethical and regulatory requirement of the CE Program. While these registrants no longer have practice rights, they do retain the right to vote, participate in non-technical Engineers and Geoscientists BC committees and boards, and represent Engineers and Geoscientists BC as registrants to the public at large. Therefore, non-practising registrants should keep up-to-date with current ethical and regulatory issues affecting the practice of professional engineering and geoscience. Moreover, the ethical conduct and regulatory knowledge of all registrants has the potential to affect how the public and government views professional engineers and geoscientists in BC.

Box 1: Definition of Non-practising Status

Registrants can apply for non-practising status if they want to remain registrants of Engineers and Geoscientists BC but no longer need to retain practice rights. Non-practising registrants have no greater right to engage in the practice of professional engineering or geoscience than a member of the general public who is not a registrant of Engineers and Geoscientists BC. Registrants with non-practising status retain the right to vote and the ability to participate on certain non-technical Engineers and Geoscientists BC boards and committees.

Non-practising registrants must use one of the following qualifiers:

- P.Eng. (Non-practising), P.Geo. (Non-practising), Eng.L. (Non-practising), or Geo.L. (Non-practising); or,
- P.Eng. (Retired), P.Geo. (Retired), Eng.L. (Retired), or Geo.L. (Retired).

The decision whether to use the qualifier “Non-practising” or “Retired” is up to each individual who holds non-practising status. Non-practising registrants who intend to practice professional engineering or professional geoscience must apply for resumption of practising status, pay the applicable fees set by Council, comply with any requirements for return to practice, and not practice professional engineering or professional geoscience until practising status has been granted by Council.

RATIONALE: Recommendation 1c

The following rationale addresses the question: *Why use this approach for Registrants-in-Training?*

The committee recommends that registrants-in-training with the designations EIT or GIT be exempt from the CE Program because they are in an “initial” education phase (as opposed to a “continuing” education phase) while they develop in their practice. When they become professional registrants, EITs and GITs are required to meet minimum standards of competency.

EITs and GITs are also required to complete ethical learning through the Professional Engineering and Geoscience Practice in BC Online Seminar (formerly known as the Law and Ethics Seminar) for registrants-in-training. The committee recommends that the new guideline still encourages EITs and GITs to meet the program intent, to emphasize the importance of continuing education at any stage of one’s career.

One area of concern for the committee are current anecdotes, which appear to be becoming trends, that some registrants may choose to remain as EITs or GITs, instead of obtaining professional designation once fully qualified. This could mean that those EITs and GITs never participate in the CE Program during their professional careers. The committee considered requiring EITs and GITs to participate in the CE Program to address this issue, but ultimately decided against making this recommendation because it is the responsibility of Engineers and Geoscientists BC, not this committee, to address this larger problem.

At this time, the number of EITs and GITs that have maintained that designation for more than 10 years is just over 400, which represents just over 5% of the more than 7,500 active EIT and GIT registrants. The committee believes that Engineers and Geoscientists BC should be monitoring this issue to get a better sense of the extent and risks of this issue and determine appropriate next steps.

RATIONALE: Recommendation 1d

The following rationale addresses the question: *Why use this approach for registrants on leave or with other extenuating circumstances?*

To provide registrants with flexibility during times of additional personal commitment or stress, the committee recommends that registrants on medical, parental, and compassionate care leave can apply for an exemption to their CE Program requirements on a yearly basis.

Beyond these situations, the committee recognizes that there may be other valid reasons why a registrant cannot meet their CE Program requirements. Therefore, registrants can submit a request for an exemption due to other circumstances and provide justification for the exemption. These requests would be reviewed by Engineers and Geoscientists BC staff and/or the committee to determine if these requests are justified and, if so, grant an exemption.

3.2.3 RECOMMENDATION 2: CE QUALITY

Recommendations 2a to 2c address the key questions: *What types of activities count for the purposes of the CE Program and are any specific types of activities required under the CE Program?* The committee's rationale for each recommendation appears below.

Recommendation 2a

The committee recommends that registrants *must*:

- undertake a minimum number of CE hours per year, where
 - a “CE hour” is 1 hour of learning that contributes to a registrant’s maintenance of competency in their scope of practice,
 - the term “competency” is defined as “the ability to perform the tasks and roles of an occupational category to standards expected and recognized by employers and the community at large” (as per the Engineers and Geoscientists BC Competency Framework), and
 - the term “scope of practice” is defined as a registrant’s area(s) of professional responsibility, including any anticipated or desired changes; and
- within an audit or practice review, demonstrate the relevance of their CE activities.

Recommendation 2b

The committee recommends that the *Continuing Education Guideline* and CE outreach activities encourage registrants to do the following:

- Identify the areas of learning that are most relevant to maintaining competency in their scope of practice and focus learning activities in those areas. Areas of learning defined in the new CE Program include Technical, Ethical, Regulatory, and Communication and Leadership.
- Consider the diversity of avenues for learning (e.g., formal learning, informal learning, mentoring, contributions to knowledge), choose the avenue(s) of learning best for their circumstances, and incorporate this into their CE plan.
- Seek input from peers and/or employer on a CE plan (discussed further in [Recommendation 4: CE Documentation](#) below).

Recommendation 2c

The committee recommends that all registrants *must* complete some amount of ethical and regulatory learning every year and that Engineers and Geoscientists BC staff create free annual webinars on ethical and regulatory issues, similar to those currently carried out on quality management requirements and practice resources. The new *Continuing Education Guideline* will provide guidance on what constitutes appropriate ethical and regulatory learning.

RATIONALE: Recommendations 2a and 2b

The following rationale addresses the question: *Why shift from the current program's use of "categories" to the use of "areas of learning" and "avenues of learning"?*

The current CPD program refers to "categories" of activities: Professional Practice, Formal, Informal, Participation, Presentations, and Contributions to Knowledge. The new CE Program will instead refer to these categories as "avenues of learning," because they represent different ways of *how* people *can* learn, rather than *what* people *should* learn.

To help registrants think about what to learn in the new CE Program based on their area of practice and level of responsibility, the four key avenues of learning in which registrants should remain competent are Technical, Ethical, Regulatory, and Communication and Leadership (see [Box 2](#) below).

This recommendation is a significant departure from how eligible CE activities are defined in the current *Continuing Professional Development Guideline*. The current guideline defines the eligible activities that can count toward the CE Program in terms of different eligible avenues of learning, namely formal learning, informal learning, participation, contributions to knowledge, presentations, and professional practice (see [Figure 4](#) below). To be in compliance with the current guideline, registrants must complete CE activities in three of the six avenues of learning categories. A maximum number of CE hours can be claimed per category in each year (see Section 3.1 of the current guideline); however, surplus hours above this maximum can be carried over for a maximum of 2 years from the date of completing the activity (see Section 4.3 of the current guideline and [Figure 4](#) below).


Category	Hours	Maximum Per Year
Professional Practice	15 hours = 1 PDH	50 PDHs
Formal	1 hour = 1 PDH	30 PDHs
Informal	1 hour = 1 PDH	30 PDHs
Participation	1 hour = 1 PDH	20 PDHs
Presentations	1 hour = 1 PDH	20 PDHs
Contributions to Knowledge	Limits Apply	30 PDHs
		
Development of published codes and standards	1 hour = 1 PDH	
Patents	1 patent = 15 PDHs	
Publication of papers in a peer-reviewed technical journal	1 paper = 15 PDHs	
Thesis at Masters or Ph.D. level (successfully defended and approved)	1 thesis = 30 PDHs	
Publication of a book (PDHs claimable over two years)	1 book = 60 PDHs	
Publication of articles in non-reviewed journals or internal company report	1 article = 10 PDHs (max of 10 PDHs/yr)	
Reviewing articles for publication	1 hour = 1 PDH (max of 10 PDHs/yr)	
Editing papers for publication	1 hour = 1 PDH	

Figure 4: Summary of Eligible Activities from the Current Continuing Professional Development Guideline

The committee's Recommendation 2a on CE quality puts maintaining competency as the central focus of CE activities and removes the need to comply with specific avenues of learning that may or may not be relevant to a registrant's circumstances. This approach gives registrants the freedom to decide what CE activities will best enable them to achieve this goal for their individual circumstances. This additional flexibility recognizes that registrants have a wide diversity in their accessibility to CE activities. Some registrants live in urban areas with numerous choices of learning opportunities, while others live in rural areas with few in-person learning opportunities that may be relevant to their needs. Similarly, some registrants' employers have annual budgets for attending courses and conferences, while other registrants' employers do not provide financial support for learning activities and/or provide time off for training.

The committee understands that many CE programs prescribe rules around avenues of learning based on the assumption that some avenues of learning are better than others; for example, that formal learning activities are better than informal learning activities. The committee believes this level of micromanaging a registrant's continuing education provides no proven benefits to maintaining competency and adds unnecessary complexity to a program. Registrants should be trusted to choose the CE activities that maintain their competency in a format best suited to their circumstances. For this reason, the *Continuing Education Guideline* would still discuss the avenues of learning, but would neither include any prescriptive requirements for undertaking learning in specific avenues, nor assign minimum or maximum amounts of CE learning to those avenues. From a compliance perspective, it is a sufficient check that registrants will need to explain their rationale for choosing CE activities in an audit or practice review.

RATIONALE: Recommendations 2b and 2c

The following rationale addresses the questions: *What are the new “areas of learning” and why are they emphasized? Why require yearly ethical and regulatory learning?*

Rather than emphasizing avenues of learning in the new CE Program, the committee believes the emphasis should be on how different content areas of learning are connected to maintaining competency. The committee has defined the core areas of learning for engineering and geoscience professionals as Technical, Ethical, Regulatory, and Communication and Leadership (see Box 2 below).

Box 2: Areas of Learning in the New Continuing Education Program (CE Program)

- **Technical:** Learning activities related to advancing a professional's technical and professional knowledge in their specific field of practice.
- **Ethical:** Learning activities related to advancing a professional's knowledge of how to act ethically and meet the obligations of the Engineers and Geoscientists BC Code of Ethics. Activities that support Indigenous engagement and reconciliation would also qualify under this area of learning.
- **Regulatory:** Learning activities related to advancing a professional's knowledge of regulatory requirements that affect their current and/or future role, including codes, standards, and requirements in relevant legislation and regulations.
- **Communication and Leadership:** Learning activities related to advancing a professional's non-technical knowledge in their field of practice or professional role, including business, communications, and leadership development. These activities are generally intended to improve how a professional interacts with other people or functions in an organization.

The new *Continuing Education Guideline* would recommend that practising registrants consider their scopes of practice and target a mix of CE learning across all categories relevant to them. Furthermore, the committee recommends that all registrants be required to undertake some amount of ethical and regulatory training every year. The committee makes these recommendations for two main reasons:

- Maintaining competency in ethical and regulatory areas is fundamental for all practising registrants.
- A review of posted discipline notices for the past 5 years indicates that the majority of failures that led to disciplinary actions were linked to ethical and/or regulatory issues (e.g., failure to follow professional practice guidelines, failure to retain documents, improper use of seal).

To facilitate ethical and regulatory learning for all registrants in a simple, cost-effective way, the committee recommends that Engineers and Geoscientists BC staff conduct free annual webinars on ethical and regulatory issues that registrants can view remotely, similar to the current quality management and practice resources webinars. Furthermore, registrants would be able to complete any learning that satisfies the ethical and regulatory requirements, such as attending a seminar on updates to codes and standards, completing business ethics training, or completing training in quality management requirements through the Regulation of Firms Program and/or the Organizational Quality Management Program.

3.2.4 RECOMMENDATION 3: CE QUANTITY

Recommendations 3a to 3c address the key question: *How much continuing education must registrants do in a given time period?*

Recommendation 3a

The committee recommends that the required number of CE hours be met on a 3-year rolling basis. The committee also recommends that registrants must record their CE hours in the year they are earned; registrants would not be allowed to revise CE hours from previous years or carry over hours from one year to future years.

Recommendation 3b

The committee recommends that the required number of CE hours be 60 hours per 3-year rolling period.

Recommendation 3c

The committee recommends that professional practice hours not be counted toward required CE learning as is done in the current *Continuing Professional Development Guideline*. The recommended number of required CE hours will be reduced in the new *Continuing Education Guideline* to account for this change.

RATIONALE: Recommendation 3a

The following rationale addresses the question: *Why use a 3-year rolling basis for meeting required CE hours?*

Recommendation 3a provides registrants with flexibility to balance their learning opportunities and work commitments in a way that best suits their specific circumstances and does not compromise the CE Program's contribution to helping registrants maintain competency.

A 3-year rolling basis for CE hours works as follows:

- In the year after a registrant first becomes registered, the first 3-year rolling period starts.
- A registrant must meet their required CE hours by December 31 of the third full year after their registration date. For example, if a registrant becomes registered during 2020, they must meet their CE hour requirement by the end of 2023.
- Once a registrant completes the first 3-year period, subsequent 3-year periods begin to overlap and include the new activities and credit hours reported throughout the year plus the activities and credit hours reported for the preceding 2 years.

The committee recommends that registrants be required to record their CE hours in the year that they are earned; registrants would no longer be allowed to revise CE hours from previous years. This would reduce the possibility that registrants might change previous entries to be retroactively compliant with CE Program requirements when they have not completed sufficient learning in the current year. Also, since the requirements around avenues of learning and their associated

minimum and maximum hours is removed, registrants would also no longer need to carry hours forward into the future, and thus this provision of the current CPD program would be eliminated.

Figure 5 and Table 3 below illustrate and provide examples of the 3-year rolling period system.

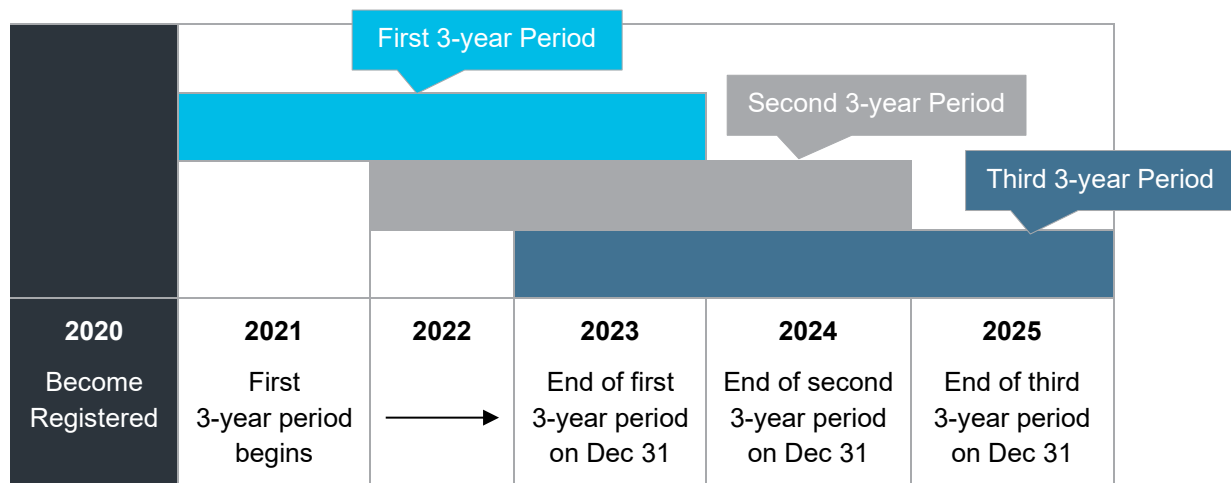


Figure 5: Illustration of 3-Year Rolling Period

Table 3: Example of a 3-Year Rolling Period

YEAR	CE HOURS (BY YEAR)	CE HOURS (3-YEAR RUNNING TOTAL)	COMPLIANT WITH 60-HOUR CE REQUIREMENT?
2021	10	–	–
2022	35	–	–
2023	15	10 + 35 + 15 = 60	Compliant
2024	20	35 + 15 + 20 = 70	Compliant
2025	20	15 + 20 + 20 = 55	Not Compliant

RATIONALE: Recommendation 3b

The following rationale addresses the question: *Why is the requirement set at 60 hours of CE learning every 3 years and not another amount?*

The committee's review of literature on effective continuing education programs found a lack of evidence for establishing what the minimum CE hours should be to support maintaining competency. In the absence of this evidence, the committee did a review of other jurisdictions and professions (shown in [Table 2: Summary of Recommendations to Council](#)) and found that the number of CE hours required in the current *Continuing Professional Development Guideline* is at the upper end of what other professions require, and is the same as what other engineering and geoscience regulatory associations in Canada require.

However, the committee's proposed definition of what counts as a CE hour is different from what other engineering and geoscience regulators in Canada define as a CPD hour. The committee is proposing that all CE hours must contribute to a registrant's maintenance of competency in their scope of practice. APEGA (the Association of Professional Engineers and Geoscientists of Alberta), APEGS (the Association of Professional Engineers and Geoscientists of Saskatchewan), and ENS (Engineers Nova Scotia) allow a maximum of 10 CPD hours per year for community service, activities that do not have to contribute to the maintenance of competence (e.g., coaching sports, service in charitable or religious organizations).

Thus, the committee believes that by setting the CE hour requirement at 60 hours every 3 years (20 hours annually, on average), BC will have requirements similar to those of all other jurisdictions in Canada without including activities that are not directly related to competency. As shown in [Table 4: Minimum Number of Continuing Education \(CE\) Hours in Other Jurisdictions and Regulated Professions](#) below, this annual amount also keeps BC's requirements more stringent than all programs in the United States and the majority of other professional regulators in BC that the committee surveyed.

RATIONALE: Recommendation 3c

The following rationale addresses the question: *Why drop the inclusion of professional practice hours?*

To be in compliance with the current *Continuing Professional Development Guideline*, registrants are required to complete an average of 80 CPD hours per year (240 hours on a 3-year rolling total). For most learning activities, 1 hour of a learning activity counts as 1 CPD hour. For professional practice hours, 15 professional practice hours counts as 1 CPD hour.

Registrants can count a maximum of 50 professional practice hours each year and can also carry forward surplus professional practice hours for 2 years (i.e., surplus hours above the annual maximum). For registrants practising more than 750 hours per year (approximately one-third of the year full-time) or practising full-time for 1 in 3 years, professional practice hours are essentially an automatic credit toward their CPD hour requirements.

The committee believes the vast majority of registrants would fall into the group that can automatically claim these 50 hours, and so this system effectively means most registrants only have to complete an average of 30 CPD hours per year in addition to their work hours. The minority of registrants who work less than 33% of the year full time would not be able to claim the full 50 CPD hours for professional practice and would have to complete those hours through other avenues of learning.

This observation led to committee to discuss the following key questions in Phase 2: *What value is added to the program by including professional practice hours in the CE Program? Does it just add complexity to the communication of the program with no additional value?*

[Box 3](#) below outlines the reasons for and against including professional practice hours, as outlined in the current *Continuing Professional Development Guideline*.

Box 3: Reasons For and Against Including Professional Practice Hours, as Outlined in the Current Continuing Professional Development (CPD) Guideline

REASONS FOR	REASONS AGAINST
<ul style="list-style-type: none"> • Risk mitigation: For practising registrants practising less than 33% of full time per year or who are unemployed for 3 years, including professional practice hours requires these registrants to “make up” for their reduced on-the-job learning by completing other learning activities that contribute to maintaining their competency. • Consistency: A similar approach to counting professional practice hours for CE hours is included in all of the other mandatory CE Programs for engineering and geoscience professionals in other provinces and territories, as well as for BC agrologists and applied biologists. • Symbolism: Including professional practice recognizes the value of on-the-job learning. 	<ul style="list-style-type: none"> • Regulatory overlap: The committee believes that most registrants practising less than 33% of full-time per year are sole practitioners. Through the Regulation of Firms development process, sole practitioners were recognized as having additional risk factors such as being more prone to practising in isolation from other colleagues and practising part-time. Council approved the inclusion of sole practitioners in the Regulation of Firms Program as a means of mitigating risk to the public and the environment. These practitioners will therefore be subject to additional oversight from the Regulation of Firms Program. Requiring part-time sole practitioners to also complete additional CE hours compared to full-time registrants would be applying another regulatory tool to mitigating the risks that the Regulation of Firms Program is addressing. • The activities that could be counted as “professional practice hours” are difficult to define: Engineering and geoscience are dynamic professions. Professional engineers and geoscientists are increasingly working in positions and sectors that would not traditionally be considered “professional engineering and geoscience”. However, these professionals are using their analytical training and core ethics from the field of engineering and geoscience, and they still think of themselves as being part of the professional engineering and geoscience community. Including professional practice hours within the CE Program would require a more detailed definition of “professional practice”, which could be difficult to get agreement on and may quickly become out of date in these dynamic professions. • Complexity for communicating and understanding the CE Program: The inclusion of professional practice hours complicates the messaging of the CE Program. Without professional practice hours, the CE Program could have a simple message telling registrants that they are required to do 20 hours per year on average of learning activities that help them maintain their competency. With professional practice hours, the messaging becomes 80 CE hours per year, where professional practice hours count as 15-to-1, meaning a maximum of 50 CE hours from professional practice hours can be claimed each year, surplus hours can be carried forward for 2 years, and non-professional practice learning activities can count on a 1-to-1 basis.

Given the reasons listed above, the committee believes that the reasons against keeping professional practice hours are more compelling than those for keeping them, and thus the committee recommends that professional practice hours not be included.

Table 4: Minimum Number of Continuing Education (CE) Hours in Other Jurisdictions and Regulated Professions

REGULATORY BODY	AVERAGE ANNUAL CE HOURS REQUIRED (EXCLUDING PROFESSIONAL PRACTICE HOURS)	ALLOWABLE ACTIVITIES	MINIMUM REQUIRED HOURS FOR ACTIVITIES (DIRECTLY RELATED TO MAINTAINING COMPETENCY IN SCOPE OF PRACTICE)
ENGINEERING AND GEOSCIENCE REGULATORY BODIES			
APEGA (Alberta)	30	Must have activities in three of six categories. Participation category allows a maximum of 10 hours per year in community service activities that do not require the application of technical knowledge; this includes coaching sports and activities for charitable, service, or religious organizations, but also includes municipal, provincial, or federal public service.	20
APEGS (Saskatchewan)	30	Must have activities in three of six categories. Participation category allows a maximum of 10 hours per year in community service activities that do not require the application of technical knowledge; this includes coaching sports and activities for charitable, service, or religious organizations, but also includes municipal, provincial, or federal public service.	20
APEGM (Manitoba)	30	Must have activities in three of six categories. Participation category allows a maximum of 20 hours per year in community service activities that do not require the application of technical knowledge; this includes coaching sports and activities for charitable, service, or religious organizations, but also includes municipal, provincial, or federal public service.	10
Engineers Nova Scotia	30	Must have activities in three of six categories. Participation category allows a maximum of 10 hours per year in community service activities that do not require the application of technical knowledge; this includes coaching sports and activities for charitable, service, or religious organizations, but also includes municipal, provincial, or federal public service.	20
APEGNB (New Brunswick)	30	Must have activities in three of six categories. Participation category allows a maximum of 10 hours per year in community service activities that do not require the application of technical knowledge; this includes coaching sports and activities for charitable, service, or religious organizations, but also includes municipal, provincial, or federal public service.	20
PEGNL (Newfoundland and Labrador)	30	Participation category allows a maximum of 15 hours per year to be claimed at a ratio of 2:1 (2 hours of service = 1 professional development hour), including service on boards or committees of charitable or community-based organizations and public service. Guideline specifically does not allow hours spent coaching sports, singing in choirs, or collecting for charities.	15

REGULATORY BODY	AVERAGE ANNUAL CE HOURS REQUIRED (EXCLUDING PROFESSIONAL PRACTICE HOURS)	ALLOWABLE ACTIVITIES	MINIMUM REQUIRED HOURS FOR ACTIVITIES (DIRECTLY RELATED TO MAINTAINING COMPETENCY IN SCOPE OF PRACTICE)
USA State Licensing Bodies	0-15	Of the 50 states in the USA, eight have no requirement for CPD, two require 8 hours/year, one requires 9 hours/year, seven require 12 hours/year, and the rest (32) require 15 hours/year. Requirements likely differ, but one example (Indiana) requires that an activity must be from an approved organization and designed to directly enhance a professional engineer's knowledge and skill in providing services relevant to the practice of engineering. NCEES guidance states that one of the hours must be earned in an activity that focuses on ethics.	Varies, 0-15 (activities unrelated to practice do not count)
OTHER REGULATED PROFESSIONS			
ASTTBC	12	Community engagement and volunteering allowed when it is relevant to practice.	12
BC Institute of Agrologists	Approx. 32/year	Overall requirement is 125 hours per 3 years. 10 hours each year can come from professional practice, and 10 must come from educational learning. Community involvement is allowed but is noted that it must "develop you as a professional agrologist".	Approx. 32
BC Land Surveyors	15	All hours should relate to area of practice, and half must be in courses, seminars, workshops, or other training (not participation, presentations, or self-study).	15
Chartered Professional Accountants of BC	40	No specifics given for allowable activities; guideline states that "it is up to the member to determine the learning activities that best suit their professional role."	40
College of Applied Biology	Approx. 22/year	Overall requirement is 100 hours per 3 years, with a maximum of 10 from professional practice. Volunteering is allowed but examples given appear to relate directly to area of professional practice.	Approx. 22
Law Society of BC	12	All 12 hours must be from an accredited provider. Self-study is not included. At least 2 hours must pertain to professional responsibility and/or ethics.	12
Planning Institute of BC	18	Minimum of 9 hours must come from structured activities, the rest from self-directed activities. Volunteering is allowed for 3 hours/year/role of self-directed allotment.	9
Project Management Institute	20	Two categories: Education and Giving Back. In a 3-year cycle (60 hours), a minimum of 35 hours must be earned from Education, and a maximum of 25 can be earned from Giving Back. Giving Back hours are very flexible and can include creating content, presentations, sharing knowledge, and volunteering. There are no specifics about what is or is not allowed in these examples.	Approx. 12

3.2.5 RECOMMENDATION 4: CE DOCUMENTATION

Recommendations 4a to 4c address the key question: *What types of documentation must registrants maintain with respect to the CE Program?*

Recommendation 4a

The committee recommends that all practising registrants must have the following two CE documents and must update these documents on an annual basis:

1. CE plan
2. Record of CE hours and activities completed

To support registrants in meeting the requirements for documentation, Engineers and Geoscientists BC would provide templates and online tools to support registrants in completing their CE plan and tracking hours and activities. However, using these templates would not be mandatory.

Recommendation 4b

The committee recommends establishing the following minimum requirements for the information a CE plan must include:

1. Definition of the registrant's role and scope of practice, including any anticipated or desired changes
2. Characterization of the risks of their practice to the public and/or the environment
3. Outline of learning goals and priorities
4. Identification of the activities that the registrant will do to advance those learning goals and priorities, including how the requirements for ethical and regulatory learning will be met

Recommendation 4c

The committee recommends that registrants should be required to keep a record of their CE documentation, including evidence to prove their completion of CE learning activities, for a minimum of 4 years, and have the documentation available for review in the event of an audit or practice review.

RATIONALE: Recommendation 4a

The following rationale addresses the question: *Why require a CE plan?*

In the review of literature and studies around effective CE programs, the committee found that the more effective aspects of certain CE programs (where effective = CE activity is linked to performance of professionals) generally focused on the move from an inputs-based approach to an outputs-based approach, of which a CE plan is one example.

An inputs-based program is what is currently in place in BC and most regulators across Canada; specifically, it is a program that requires registrants to meet the program requirements by

completing learning based on a points system (such as a number of CE hours). An inputs-based program rewards attendance or completion of activities regardless of the actual value of the activity to a registrant. Although registrants have to ensure activities are relevant to their practice and could reasonably be assumed to not claim activities that did not give them value, in practice a registrant will likely claim CE hours for a course that they attended in their area of practice, regardless of how they felt about the effectiveness of the learning.

Conversely, outputs-based approaches seek to measure the impact of continuing education on practice, and feed into the planning cycle for future CE activities. Incorporating an outputs-based element like a CE plan requires practitioners to reflect on their scope of practice, the risks of their practice, and the subsequent learning activities they prioritize. The intent, after the reflective process, is to encourage each professional to select the most effective CE activities for their situation rather than attending activities that are easy or convenient.

RATIONALE: Recommendation 4a

The following rationale addresses the question: *Why use this approach to CE plan templates?*

The approach of providing templates for registrants, but not making them mandatory, emphasizes flexibility for registrants to keep records in a format of their choice, but also supports registrants who are looking for additional guidance. The committee recognizes that some registrants already have established templates for CE plans and activity tracking that they or their employers use and are familiar with. Requiring the use of Engineers and Geoscientists BC templates over these others, provided they meet minimum requirements, would be onerous for some registrants, does not contribute to enhanced competency, and reduces simplicity and flexibility.

RATIONALE: Recommendation 4b

The following rationale addresses the question: *Why apply these minimum requirements for a CE plan?*

Requirements 1, 2, and 4 of Recommendation 4b are standard components of most CE plans required by other professional regulators. Additionally, the requirement to define a scope of practice is aligned with the requirement in the *Professional Governance Act* that registrants will have to declare competence for projects within their areas of practice. The new *Continuing Education Guideline* would provide additional guidance on how to meet the recommended CE plan requirements and would have a special focus on helping registrants reflect on the risks of their practice in a way that connects those risks to CE goals and activities.

For Requirement 3 of Recommendation 4b, as part of the risk-informed approach to continuing education (see Section 3.1.2 above), the committee recommends that registrants characterize the risks of their practice with respect to the public and the environment within their CE plans. This will serve as a means of building awareness and encouraging reflection around what learning activities could help registrants mitigate these risks. In November 2017, during Phase 1 of this process, and at the 2018 Engineers and Geoscientists BC Annual Conference, committee members heard a presentation from University of BC researcher Dr. Glenn Regehr about the risks of self-assessment, where he noted that professionals are poor at identifying the areas of their practice that require improvement and development. To help mitigate this persistent issue, the committee would create a risk assessment tool within the *Continuing Education Guideline* that would help registrants reflect on the risks of their practice to the public and the environment. The committee

also plans to recommend that registrants review their CE plans and risk-assessment results with a peer or employer wherever possible.

There are multiple ways that a risk-assessment tool could be structured in the *Continuing Education Guideline*; some examples that the committee would review during the writing of the new guideline include:

- a risk assessment questionnaire that encourages registrants to think about possible risks and write a summary of their practice risks;
- a risk assessment questionnaire about a registrant's practice (e.g., quality management procedures, risks of failure) that assigns a risk score or risk category (i.e., low, medium, or high); or
- thought-provoking questions about risk that allows a registrant to reflect on their practice.

RATIONALE: Recommendation 4c

The following rationale addresses the question: *Why set this retention period and these evidence requirements?*

The approach in Recommendation 4c is consistent with the requirements of the current *Continuing Professional Development Guideline* and represents one full 3-year reporting period plus an additional year. If a registrant is selected for an audit or assigned a practice review, they will need to have enough documentation to show that they have completed the CE learning activities that they have reported over this 4-year period. This evidence could take the form of receipts, certificates of completion, exam results, transcripts, journal subscriptions, or detailed notes, depending on the activity completed.

3.2.6 RECOMMENDATION 5: CE REPORTING

Recommendation 5 addresses the key question: *How will registrants demonstrate compliance with the CE Program?*

Recommendation 5

The committee recommends that practising registrants must report CE hours and activities annually (toward their 3-year rolling period) and upload their most recent CE plan, completed within the last year, through the annual registrant renewal process.

RATIONALE: Recommendation 5

The following rationale addresses the question: *Why use this approach for reporting?*

This approach emphasizes the principles of competency, enforceability, and transparency. The committee believes that requiring an annual submission of hours and activities, as well as submission of the CE plan, will be the best way to support registrants in meeting the requirements of the CE Program. These requirements support registrants in maintaining competency, so it is important to have a reporting processes in place that supports their completion.

This reporting approach also enhances enforceability by allowing registrants who are selected for random audits or practice reviews to have their basic documentation reviewed by Engineers and Geoscientists BC without requesting additional records. Finally, this requirement provides additional transparency by allowing Engineers and Geoscientists BC to collect information and display a portion of it to the public or the Office of the Superintendent of Professional Governance. Although the amount of information to be displayed to the public has not yet been determined, it would be possible to show a registrant's compliance with the CE Program through the breakdown of their CE activities, if requested.

3.2.7 RECOMMENDATION 6: CE ENFORCEMENT

Recommendations 6a and 6b address the key question: *How will the CE Program be enforced?*

Recommendation 6a

The committee recommends that Engineers and Geoscientists BC should follow the standard procedures for enforcing mandatory regulatory programs, such as having a range of tools available for enforcing compliance with the new *Continuing Education Guideline*, including practice reviews, audits, and the investigation and disciplinary process.

Registrants who fail to submit CE documentation, or registrants who are deemed non-compliant, should be subjected to an escalating series of actions and penalties. The intended outcome should be to promote compliance with the guideline rather than to punish registrants.

Recommendation 6b

The committee recommends that Engineers and Geoscientists BC should evaluate CE documentation during audits, practice reviews, and investigations, to check that CE requirements have been met and CE learning is relevant to a registrant's role and area of practice. Where deficiencies are identified, the outcome of an audit, practice review, or investigation could result in guidance or requirements to increase or change the amount and type of continuing education that a registrant is expected to complete.

RATIONALE: Recommendation 6a and 6b

The following rationale addresses the question: *Why use this approach for CE enforcement?*

Recommendation 6a is consistent with the approaches currently in use for existing regulatory programs, as well as being consistent with the recommendations provided in the Advisory Task Force on Corporate Practice's Phase 3 Recommendations Report for enforcement of the future Regulation of Firms Program. It uses the current programs in place, including the audit, practice review, investigation, and discipline processes, and avoids creating a parallel process for the CE Program that might overlap with other programs or create redundant enforcement.

Recommendation 6b also builds on current precedent, where registrants subject to practice reviews have their CE activities reviewed, and the results of reviews are incorporated into recommendations or requirements provided at the conclusion of the practice review process.

3.2.8 RECOMMENDATION 7: INTEGRATION WITH THE REGULATION OF FIRMS PROGRAM

Recommendations 7a and 7b address the key question: *How should the CE Program be integrated with the new Regulation of Firms Program?*

Recommendation 7a

The committee recommends that individual registrants must be accountable to Engineers and Geoscientists BC for fulfilling their CE Program requirements.

Firms registered with Engineers and Geoscientists BC are not accountable for their employees meeting CE Program requirements.

Recommendation 7b

The committee supports the intent of the Advisory Task Force on Corporate Practice to require that firms support their professionals in meeting their individual CE requirements.

Furthermore, the committee recommends that the Regulation of Firms Advisory Group further clarify the various mechanisms of support that would be acceptable.

RATIONALE: Recommendation 7a

The following rationale addresses the question: *Why set these accountability requirements for individuals?*

This approach maintains the current standard of an individual professional's responsibility of accountability to Engineers and Geoscientists BC for meeting mandatory regulatory requirements.

Until the Regulation of Firms Program is fully implemented, Engineers and Geoscientists BC still has the mandate to regulate individuals. Even after the Regulation of Firms Program is in place, it will be the responsibility of each professional to demonstrate compliance with their regulatory requirements regardless of their employer's status. Keeping the responsibility on individuals recognizes that professionals may change employers or positions at any time, and that keeping individual CE records for all employees places a significant additional burden on employers that would not improve the individual's competency.

RATIONALE: Recommendation 7b

The following rationale addresses the question: *Why support these requirements for regulated firms?*

The three pillars of the proposed Regulation of Firms Program are Ethics, Quality Management, and Professional Development. As per the Advisory Task Force's recommended model, to meet the Professional Development requirement, "regulated firms must have a documented professional development policy appropriate for the professional products and/or services provided by the organization."

The committee believes that to meet the standard of "appropriateness," each regulated firm's policy must show support for individuals to meet their personal regulatory requirements around continuing

education. The specific support is expected to vary, perhaps widely, for different organizations, but not supporting or actively discouraging employed professionals from meeting their regulatory obligations should not be considered an acceptable policy. This approach is consistent with the current voluntary Organizational Quality Management Program, where employers must allow and/or facilitate professionals to meet other individual regulatory requirements, including document retention, checking of work, field reviews, direct supervision, and use of professional practice guidelines.

4.0 OTHER CONSIDERATIONS

4.1.1 REGISTRANTS PRACTISING IN OTHER JURISDICTIONS

During multiple rounds of registrant consultations, both prior to the 2015 Bylaw vote and in the consultation in 2019, the committee was asked to consider registrants who practice in other jurisdictions, to avoid adding unnecessary administrative burden to those registrants. During the 2019 survey, approximately 30% of respondents indicated that they were registered in another jurisdiction. Since approximately 10% of Engineers and Geoscientists BC registrants took part in the survey, the committee believes this is likely representative of the overall registrant pool.

In the recommendations outlined in this report, the committee has balanced the desire of those registrants to avoid a layer of unnecessary bureaucracy with the understanding that the new CE Program is intended to improve upon programs used in other jurisdictions. The committee is not recommending that registrants who are registered in other jurisdictions be completely exempt from the new CE Program, which supports the committee's belief that characteristics of this program, specifically the required regulatory and ethical learning, are necessary for all registrants, regardless of where they are registered.

The committee has decided that requiring compliance for all practising registrants does not represent an undue burden on those registered in other jurisdictions for the following reasons:

- The general program requirements are consistent with the majority of other jurisdictions, including the required number of CE hours over a 3-year rolling period.
- A registrant who satisfies the requirements of another jurisdiction would be fully compliant with the new CE Program, provided they have completed some amount of ethical and regulatory training and prepared a CE plan.
- Registrants who do not complete some amount of ethical and regulatory training for another jurisdiction would be able to meet this requirement through free, online learning opportunities provided by Engineers and Geoscientists BC.
- The required CE plan can be completed on any template as long as the risk-characterization component is also completed.
- Registrants are not required to submit full documentation, which eliminates multiple submissions of complete CE documentation.

4.1.2 ACCESSIBILITY OF CONTINUING EDUCATION OPPORTUNITIES

The committee recognizes that registrants work and live throughout BC, and that some registrants have greater access to continuing education opportunities than others, since seminars and courses are typically offered in major metropolitan areas of the province. The committee believes that the new CE Program emphasizes simplicity and flexibility in a way that will increase the ability of registrants to meet their CE learning requirements regardless of their location. For example, by removing the requirement to meet specific avenues of learning, registrants with reduced access to formal learning opportunities could undertake appropriate informal activities to meet their requirements instead.

Even with this enhanced flexibility, the committee recognizes that Engineers and Geoscientists BC staff will need to review current practices for offering professional development events, to ensure that access to learning opportunities is adequate to facilitate all registrants requirements to meet CE Program requirements. Engineers and Geoscientists BC may also need to develop additional tools to connect registrants with learning opportunities beyond those offered by Engineers and Geoscientists BC, including those offered by other regulatory bodies, educational institutions, and industry groups.

5.0 NEXT STEPS

With the completion of Phase 2 of this process, and pending Council's acceptance of these recommendations, the committee proposes starting Phase 3, which would focus on guideline and tool development, communication, and implementation planning.

5.1.1 GUIDELINE AND TOOL DEVELOPMENT

Before the new CE Program is rolled out to registrants, a number of tools and supporting documents must be developed, modified, updated, and/or improved, including:

- the Continuing Education Bylaw under the new *Professional Governance Act* (upon receiving regulatory authority);
- the *Continuing Education Guideline* (to replace the current *Continuing Professional Development Guideline*);
- a template for the CE plan;
- updates to the online Professional Development Recording Centre to make the system more user-friendly; and
- updates to registration and renewal processes, websites, and tools to integrate with the new CE Program.

The committee proposes that the committee and staff start to develop these tools, and begin to discuss proposed changes with the other departments of Engineers and Geoscientists BC that will contribute to tool development (e.g., Information Services, Registration).

5.1.2 COMMUNICATION

The committee proposes engaging the Engineers and Geoscientists BC communications staff to develop a communications action plan, to initiate communication about the new CE Program as soon as possible. This action plan would summarize proposed communication actions and milestone dates, so the program details are clearly explained to registrants well in advance of the first compliance deadline.

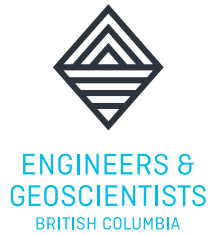
5.1.3 IMPLEMENTATION PLANNING

The committee has developed the following expected timeline for Phase 3:

- **Develop the *Continuing Education Guideline*: November 2019 to January 2021**
 - November 2019 to June 2020
 - Develop the communications action plan
 - Design and test a CE plan template and risk-based questions for development of CE plans
 - Begin drafting of the *Continuing Education Guideline*
 - June 2020
 - Submit the Continuing Education Bylaw to the Office of the Superintendent of Professional Governance
 - June 2020 to Fall 2020
 - Finalize the CE plan template
 - Finalize the *Continuing Education Guideline*
 - Fall 2020
 - Continuing Education Bylaw comes into effect under new *Act*
 - Seek Council approval on new *Continuing Education Guideline* and tools, including the CE plan template
- **Approval and Communication of Continuing Education Bylaw: Fall 2020 to Summer 2021**
 - Fall 2020 to June 2021
 - Implement the communications action plan
 - Announce the mandatory program and engage registrants through a variety of avenues to communicate new program requirements
- **Implementation: July 2021 onwards**
 - July 2021
 - Initiate the CE Program
 - July 2022
 - First reporting deadline (i.e., reporting on CE activities in 2021-2022)
 - July 2024
 - End of first 3-year reporting period
 - First compliance checkpoint for the 3-year CE hour requirement

6.0 Appendix

Appendix 1: Consultation Summary Report



CONSULTATION SUMMARY REPORT

MEMBER FEEDBACK ON PROPOSED CHANGES TO THE CONTINUING PROFESSIONAL DEVELOPMENT (CPD) PROGRAM

JULY 2019, VERSION 1

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EXECUTIVE SUMMARY

Under the Code of Ethics of Engineers and Geoscientists British Columbia (the “association”), all professional engineers and geoscientists registered with the association need to maintain high levels of professional competence and undertake continuing professional development (“CPD”) that is relevant to their practice. To support members in achieving this requirement, the association developed a guideline that outlines expectations regarding the types of activities and amount of professional development that practising members are expected to undertake.

The current guideline has been in effect since 2011, and was designed to provide flexibility to meet members’ unique professional requirements. A copy of the guideline is available from the association’s website [here](#).

Compliance with these guidelines is not mandatory; however, over the last decade, the association’s Council has sought to implement a mandatory CPD program for all members, in line with other professions. Bylaws to implement a mandatory CPD program were proposed in 2010 and 2015, and in both years, the proposed bylaws were defeated in a vote by the membership.

WHY ARE WE REVISITING THIS?

In response to the failure of the proposed bylaws, Council directed the association’s CPD Committee to continue exploring modifications and improvements to the current program. In examining the current model and potential alternatives, the CPD Committee focussed on issues that affect and relate to CPD, including legislative challenges, government expectations, self-assessment research, jurisdictional research, and findings from practice reviews and discipline cases.

Furthermore, in response to the passing of the *Professional Governance Act* (the “Act”) in November 2018, and its requirement for the association to “establish and maintain a continuing competency program to promote high standards among members,” the CPD Committee determined that the provincial government would likely require the implementation of a mandatory CPD program.

While the introduction of government regulations to enable this new requirement will take place over several years, the CPD Committee has been exploring possible revisions to the current model to not only better support members in meeting their current obligations, but to also assist the transition into the anticipated requirements of the *Act*.

2019 CONSULTATION

Prior to developing the Phase 1 consultation survey, the CPD committee developed five guiding principles to frame the development of a revised CPD program:

1. Help professionals maintain technical, ethical, and professional competency in their field.
2. Maximize simplicity and flexibility for members.
3. Ensure the program is verifiable, enforceable, and transparent.
4. Encourage professionals to give back to and advance the professions through volunteering and mentorship.
5. Minimize administrative cost to Engineers and Geoscientists BC.

In 2019, the CPD Committee commenced the first phase of the consultation process on the revised CPD program by seeking feedback from members on key program elements. Throughout April and May, members were surveyed on the high-level principles and potential revisions to the association's CPD program.

Over 2,900 members provided their input on a number of potential changes to the way professional development requirements are set out, including how to determine the number of hours required, the number and type of activity categories, acceptable CPD activities, and reporting requirements.

From the survey, members communicated the following common themes:

- **Managing Hours**

- Approximately 45% of respondents favoured keeping the required hours the same for all professionals, as per the current guideline.
- Approximately 41% of respondents favoured an approach that varies the CPD for each professional based on some aspect of their practice (e.g., practice risk, area of practice).

- **Activities**

- A wide variety of activities (e.g., seminar presentations, webinar, mentoring) should be considered as CPD. It is important to ensure there are enough professional development opportunities for professionals of all discipline types and in all locations, including those offered at low or no cost.
- The vast majority of those surveyed (77%) favoured keeping professional practice hours as part of a revised CPD program. The comments provided on this topic strongly indicated that professionals feel that on-the-job learning is valuable and should be accounted for in a CPD program.
- With reference to keeping or revising the system of categories available in the CPD program, approximately 31% of those surveyed favoured keeping the current system, while approximately 56% favoured simplifying, modifying, or eliminating the categories.
- Maintaining a diverse range of categories to count towards CPD credits was preferred and many respondents indicated that the association should trust professionals to undertake activities relevant to their practice, regardless of whether or not it is technically focussed or verifiable.
- In regards to ethical training, approximately 38% responded positively and approximately 50% responded negatively. General comments around this topic demonstrated that members will be supportive of the concept, if it is accessible and the association provides low-to-minimal-cost training.

- **Flexibility and Compatibility**

- There needs to be flexibility in the application of a mandatory program; one that reflects the diverse needs of professionals and considers members who may be exempt from meeting requirements.
- Members registered in multiple jurisdictions made up approximately one-third of survey respondents. These members consistently emphasized their desire to have a program that aligns with the programs from other engineering and geoscience regulatory bodies.

- **Reporting Requirements**

- Members prefer to keep reporting requirements light (i.e., not submit detailed records) and to ensure that time required to spend reporting CPD activities is minimal.

A detailed summary of the survey results from each of the key themes communicated, including findings and future areas of focus, are outlined in the following pages.

NEXT STEPS

The association's CPD Committee is continuing to review the feedback collected from this consultation process, and will be considering this input as they finalize their proposed revision to the CPD model.

The model will be presented to the association's Council for approval in late 2019. Subject to the model being approved, it is expected changes will come into effect within one to two years. If the *Act* regulations are not in force by that time, the new model would replace the current guidelines as a voluntary program.

BACKGROUND AND CONTEXT

ISSUE SUMMARY

Under the Code of Ethics of Engineers and Geoscientists British Columbia (the “association”), all professional engineers and geoscientists registered with the association need to maintain high levels of professional competence and undertake continuing professional development (“CPD”) that is relevant to their practice. To support members in achieving this requirement, the association developed a guideline that outlines expectations regarding the types of activities and the amount of professional development that practising members should undertake.

Compliance with these guidelines is not mandatory; however, over the last decade, the association’s Council has sought to implement a mandatory CPD program for all members, in line with other professions. Bylaws to implement a mandatory CPD program were proposed in 2010 and 2015, and in both years, they were defeated in a vote by the membership.

Since 2017, the association’s CPD Committee, in response to a Council directive to explore modifications and improvements to the current model, has examined issues that affect and relate to CPD, including legislative challenges, government expectations, self-assessment research, jurisdictional research, and findings from practice reviews and discipline cases

In November 2018, the provincial government passed the *Professional Governance Act*, which outlined a requirement for the association to “establish and maintain a continuing competency program to promote high standards among members.”

In anticipation of new regulations for mandatory continuing education, the CPD Committee needed to ensure the current model better supported members in meeting their current obligations, as well as to assist with the transition to the anticipated mandatory requirements.

To ensure any revisions to the current model were responsive to the needs and requirements of members, in 2019, the CPD Committee sought feedback on new guiding principles and alternate options for each aspect of a revised CPD program. The following report provides a summary of the feedback garnered through the first phase of consultation.

CONSULTATION PROCESS

CONSULTATION OBJECTIVES

The consultation objectives established for the first phase of consultation were:

- to seek feedback on the guiding principles established by the CPD Committee for a new program;
- for members to identify any other guiding principles that need to be considered by the CPD Committee;
- to receive member feedback on different aspects of a CPD Program and how these could be improved in a revised model; and
- for members to identify any other factors that are yet to be considered by the CPD Committee during the development of a revised CPD program.

COMMUNICATION

During the first phase of consultation, members were provided with the following context as to why this issue was being reviewed:

- The CPD Committee is reviewing potential alternatives to the current program that would maintain the appropriate standards for public protection, while also being more flexible and achievable for members.
- The new *Professional Governance Act* will require Engineers and Geoscientists BC to maintain a continuing competency program for its members.

The following five guiding principles were also communicated to members to outline what any revisions to the current model will achieve:

1. Help professionals maintain technical, ethical, and professional competency in their field.
2. Maximize simplicity and flexibility for members.
3. Ensure the program is verifiable, enforceable, and transparent.
4. Encourage professionals to give back to and advance the professions through volunteering and mentorship.
5. Minimize administrative cost to Engineers and Geoscientists BC.

Information on the proposed changes to the CPD program and opportunities to participate in consultation was provided via the association's main communication channels, including *eNews* and a dedicated section under the "Initiatives and Consultations" area of the association's website.

CONSULTATION METHODS

The first phase of consultation was undertaken via an online survey that went live on April 12, 2019 and closed on May 10, 2019.

The CPD Committee anticipates further opportunities for consultation on future revisions will be undertaken via focus groups and/or follow-up surveys during the next phase of development.

CONSULTATION SUMMARY

PARTICIPATION

Between April and May 2019, over 2,900 members participated in the survey. One of the clearest trends related to respondent participation is that response rates increased with years of experience in current field of practice. Overall, we saw the highest level of participation from members with 21 years or more of experience in their current field of practice, and those who practiced solely within British Columbia.

While communications were not targeted to a specific member demographic, survey participation demonstrated a clear increase with years of experience in a field of practice. We anticipated a higher level of representation among this member demographic, due to their previous involvement with previous consultation on the topic over the last decade. Having previously provided feedback on the introduction of a mandatory CPD program, this demographic was likely to be more informed on the history of the issue and its application in practice.

In terms of other demographics of those survey respondents who

- 67% of respondents were registered solely in British Columbia;
- respondents who practiced in consulting engineering were better represented (41%) than those who practiced in other sectors such as geoscience (5%), high technology (5%), construction (7%), manufacturing (7%), primary/resource industry (7%), utilities (7%), and government and other (10%); and
- those with 21 years or more of experience in their field of practice made up nearly half of all respondents (49%) and those with 11 to 20 years of experience made up 26%; respondents with less than 10 years of experience in their field of practice accounted for 24% of respondents.

Please note that not all survey participants responded to questions on professional experience or demographic.

JURISDICTIONS

As with previous surveys on the issue of mandatory CPD programs, the theme of maintaining consistency with other professional regulators across the country has been constant. As noted above, approximately two-thirds of survey respondents were solely registered in British Columbia, while 21% were also registered in Alberta, and the remaining respondents were registered in one or more other jurisdictions.

Throughout the survey, the largest difference in support for various aspects of the CPD program was due to where respondents were registered, more so than for their years of experience, field of practice, or industry. To understand the context of the results and the varying levels of support for different aspects of the CPD program, results from multiple survey questions were reviewed in relation to the respondent's place of registration. These results are outlined within the detailed feedback for each theme communicated below.

DETAILED FEEDBACK

MANAGING HOURS

FEEDBACK OVERVIEW

Q: “Of the following options, which model do you prefer for determining the number of professional development hours required?”

Survey respondents provided feedback on their preferred method of determining the number of professional development hours required. The member survey indicates the following levels of support for the following options:

CPD MODEL OPTION	RESPONSES
Keep the required hours the same for all professionals	45%
Vary the required CPD hours for each professional by practice risk	24%
Vary the CPD hours for each professional by area of practice	18%
No preference	13%

Note: 168 respondents skipped this question.

Co-relation to jurisdiction of registration:

CPD MODEL OPTION	ALL RESPONDENTS	REGISTERED ONLY IN BC	REGISTERED IN ALBERTA	ALL THOSE REGISTERED ELSEWHERE
Keep the required hours the same for all professionals	45%	37%	65%	59%
Vary the required CPD hours for each professional by practice risk	24%	21%	12%	13%
Vary the CPD hours for each professional by area of practice	18%	28%	13%	16%
No preference	13%	14%	11%	12%

KEY FINDINGS

The underlying concept of CPD is to ensure practising members meeting their current obligations and maintain high levels of professional competence. As outlined in the previous section, the survey represented members at various stages of their professional practice, so it was not surprising to see a mixed response to the question of hours and minimum/maximum requirements.

While more respondents preferred to keep the required hours the same for all professionals (45%), there was a similar amount of support (42%) towards a CPD program that offered variety dependent on area of practice or practice risk.

When compared against the demographics of the survey takers, the results demonstrated that the percentage of respondents who favoured each option varied most dramatically in relation to where respondents were registered. Respondents registered only in British Columbia favoured some sort of variable system (49%) over a “same for all” approach (37%). Respondents registered in at least one other jurisdiction favoured a “same for all” approach (59%) over a variable system (29%), with respondents registered in Alberta showing the most dramatic difference (65% and 24% respectively).

AREA OF FOCUS

The CPD Committee recognizes the diversity of the professional membership and understands the need to consider CPD requirements in relation to the varying levels of professional experience. It is important to note that a revised CPD model that varies the requirements based on practice risk or area of practice would be a significant departure from the CPD guidelines and other mandatory programs in other Canadian jurisdictions.

With respect to those members who are registered in one or more province, the CPD Committee understands the desire for harmonization with other jurisdictions. However, the Committee also needs to ensure that whatever model is adopted is the most effective for all members. Consequently, the Committee is reviewing a number of possible options for incorporating members registered in multiple jurisdictions, including offering exemptions for those who have completed the requirements of an equivalent program.

PROFESSIONAL PRACTICE HOURS

Q: “Do you think professional practice should continue to count towards CPD requirements?”

FEEDBACK OVERVIEW

Under the current CPD guidelines, professional practice hours, which are those earned from active engineering or geoscience work, can contribute up to 50 of the required 80 average hours per year. Survey respondents were asked if they thought professional practice hours should continue to be included in a revised program.

The member survey indicates the following levels of support for the following options:

CPD MODEL OPTION	RESPONSES
Yes	77%
No	16%
I don't know	8%

Note: 168 respondents skipped this question.

KEY FINDINGS

Most members surveyed said they are constantly maintaining and improving their professional competency through on-the-job experience. As such, there was an overwhelming amount of support for keeping professional practice hours as part of any revised CPD requirements.

AREA OF FOCUS

Similar to the current guidelines, the CPD Committee acknowledges there is strong support for including professional practice hours as part of a revised CPD Program. In revising the current model, the Committee will consider if, similar to the current approach, there should be a maximum for claiming professional practice hours toward total CPD hours.

ACTIVITIES APPROACH

Q: “What approach to hours and categories would you like to see in a new CPD program?”

FEEDBACK OVERVIEW

After reviewing the categories in use in the current guideline (Formal, Informal, Participation, Presentations, Contributions to Knowledge, and Professional Practice), we asked respondents to comment on their favoured approach to categories in a new program.

CPD MODEL OPTION	RESPONSES
Keep the current categories and maintain a limit on the maximum number of hours per category (as per the current guideline)	31%
Simplify and/or modify the categories, and maintain a limit on the maximum number of hours per category	13%
Simplify and/or modify the categories, and remove the limit on the maximum number of hours per category	28%
Eliminate categories (minimum overall hours would still be required)	14%
I don't know	7%
Other	7%

Note: 209 respondents skipped this question.

Co-relation to jurisdiction of registration:

CPD MODEL OPTION	ALL RESPONDENTS	REGISTERED ONLY IN BC	REGISTERED IN ALBERTA	ALL THOSE REGISTERED ELSEWHERE
Keep the current categories and maintain a limit on the maximum number of hours per category (as per the current guideline)	31%	26%	43%	39%
Simplify and/or modify the categories, and maintain a limit on the maximum number of hours per category	13%	14%	9%	12%
Simplify and/or modify the categories, and remove the limit on the maximum number of hours per category	28%	29%	26%	26%
Eliminate categories (minimum overall hours would still be required)	14%	15%	11%	11%
I don't know	7%	7%	4%	4%
Other	7%	7%	6%	7%

KEY FINDINGS

Of the individual options presented, respondents preferred to keep the system of categories used in the current guideline and maintain limits on the number of hours able to be claimed in each category. A close second (31% to 28%) was the preference to simplify and/or modify the categories and remove the limit on the maximum number of hours per category.

When looked at in aggregate, 42% of respondents favoured simplifying or modifying the categories in some way, and when the “eliminate categories” responses were added, we found that a majority of respondents (56%) favoured changing the current system of categories in some way that would simplify the program.

AREA OF FOCUS

In keeping with the CPD Committee’s principle of simplicity and flexibility, the Committee will consider options to improve the current category system in a way that responds to members’ preference for change.

TYPES OF ACTIVITIES

Q: “Which of the following examples do you think should count towards meeting CPD?”

FEEDBACK OVERVIEW

To understand what activities members considered as those maintaining professional competence, the survey presented 12 types of activities. Respondents provided feedback on what activity should count towards meeting CPD program requirements:

CPD ACTIVITY	RESPONSES
Giving a presentation at work or a conference	90%
Viewing a webinar about ethical issues	89%
Mentoring an EIT/GIT	85%
Reading a technical journal	84%
Attending a technical trade show	76%
Job shadowing a colleague to learn a new skill at work	71%
Attending a seminar on communications	69%
Attending a webinar on the use of seal	68%
Having a discussion with a colleague about a technical challenge	56%
Taking a course unrelated to your current or future responsibilities	36%
Attending a seminar about generating business contacts	26%
Volunteering for a non-technical community group	25%
I don't know	1%
None of the above	1%

Note: 193 respondents skipped this question.

KEY FINDINGS

The amount of support for the majority of the activities presented showed respondents were in favour of allowing a wide variety of activities to be accepted under the CPD program.

The activities that a majority of respondents **did not** think should be accepted were related to activities that are entirely non-technical (e.g., seminars on increasing business contacts, volunteering for a community group) or unrelated to a member's current or future responsibilities. An additional question showed members' strongly supported allowing other activities to be accepted as CPD, not only those focussed on technical or ethical learning (75%), as well as activities that may not be verifiable (79%), such as self-study.

Survey respondents were also asked to provide qualitative feedback on the types of activities that should or should not count towards CPD activities. Comments on this question indicated that the program should be flexible, and nearly half of those who provided feedback on this section suggested that almost any activity should count if the professional determines it is relevant to their field of practice. Results also demonstrated there was continued support for including the current activities under the voluntary CPD program in a new program.

AREA OF FOCUS

The current guideline requires members to decide for themselves whether a CPD activity is relevant to their practice and can be claimed for CPD credit. The responses above indicate that members are generally in favour of continuing with a system that trusts professionals to select CPD activities that are relevant for their practice.

ETHICAL TRAINING

Q: “Do you think members should be required to complete a set amount of yearly ethical training (e.g., 1 hour per year) as part of their overall CPD requirements?”

FEEDBACK OVERVIEW

We asked survey takers if members should be required to complete a set amount of yearly ethical training (e.g., one hour per year) as part of their overall CPD requirements. This is similar to the requirement for members of the Association of Professional Engineers of Saskatchewan CPD program and the Professional Engineers Ontario PEAK program.

CPD MODEL OPTION	RESPONSES
Yes	38%
No	50%
I don't know	13%

Note: 215 respondents skipped this question.

KEY FINDINGS

The majority of members did not favour having a required amount of ethical training.

A follow-up question related to ethical training requirements was asked of respondents. Analysis of the comments by respondents who provided a “No” or “I don’t know” answer showed that a number of these respondents would be in favour of mandatory ethical training provided it was:

- easily accessible (i.e., offered for free and/or online);
- refreshed consistently to keep up with industry changes;
- possible to accept employer training in lieu of association-provided training; and/or
- required less frequently than what was proposed in the question.

If these factors were taken into account for the design of the revised program, this would indicate that an additional 211 Yes responses would be recorded, bringing the percentages to 45% (Yes), 45% (No), and 9% (I don’t know).

AREA OF FOCUS

The CPD Committee’s review of discipline cases from the past several years has revealed that a breach of ethics, as opposed to a technical failure, has been a consistent finding from these cases. The Committee will review the effect of including some component of ethical training as part of the overall CPD requirements as long as it is designed to be responsive to the diversity of professional members.

FLEXIBILITY AND COMPATIBILITY

Q: “In your opinion, should any of the following member categories be eligible for an exemption from the CPD program?”

FEEDBACK OVERVIEW

Survey respondents were asked if certain types of members should be eligible for an exemption from a mandatory CPD program.

CPD MODEL OPTION	RESPONSES (RANKED BY THE LARGEST PREFERENCE FOR A FULL EXEMPTION)			
	FULL EXEMPTION	PARTIAL EXEMPTION	NO EXEMPTION	I DON'T KNOW
Non-practising or retired members who are not employed	76%	14%	6%	4%
Members on long-term medical leave	66%	25%	4%	4%
Non-practising or retired members who are employed	55%	31%	10%	4%
Professionals in non-technical roles	15%	47%	33%	5%
Members-in-training	12%	28%	57%	4%
Members working part-time	6%	58%	34%	3%

Note: 168 respondents skipped this question.

KEY FINDINGS

Recognizing the professional diversity of members, there was majority support towards a CPD program that reflected the varying levels of member activity. Key findings from the survey illustrated the following:

- A majority of respondents thought that members who are not practising engineering or geoscience for an extended period of time should be fully exempt from the CPD program.
- A majority of members favoured a partial exemption for members working part-time.
- A majority of members thought that members-in-training (EITs/GITs) should not have an exemption from the CPD program.

AREA OF FOCUS

Other jurisdictions across Canada offer exemptions for a variety of member types. The CPD Committee will consider these results and the standards in place across Canada when developing the revised program.

REPORTING REQUIREMENTS

Q: “In your opinion, what documentation should members be required to submit to Engineers and Geoscientists BC of their CPD activities?”

FEEDBACK OVERVIEW

We asked survey respondents what type of documentation they should be required to submit to Engineers and Geoscientists BC for their CPD activities on a yearly basis, whether a fully detailed record, a simple declaration of compliance, or something in between.

CPD MODEL OPTION	RESPONSES
Detailed accounts of their CPD activities	12%
CPD hours only	46%
Report compliance only	33%
I don't know	3%
Other	6%

Note: 221 respondents skipped this question.

Co-relation to jurisdiction of registration:

CPD MODEL OPTION	ALL RESPONDENTS	REGISTERED ONLY IN BC	REGISTERED IN ALBERTA	ALL THOSE REGISTERED ELSEWHERE
Detailed accounts of their CPD activities	12%	14%	9%	9%
CPD hours only	46%	42%	64%	61%
Report compliance only	33%	36%	26%	29%
I don't know	3%	3%	1%	1%
Other	6%	6%	5%	5%

KEY FINDINGS

- The majority of respondents (79%) favoured a simple declaration (CPD hours or compliance only) over a more detailed accounting of activities
- For those registered outside of British Columbia, a strong majority favoured members recording their total CPD hours over the other two options presented
- Other answers that members provided for alternate reporting schemes included the following:
 - “Submit detailed accounts for verifiable activities, hours for non-verifiable or professional practice activities.”
 - “Members should be subjected to examinations every 5 years.”
 - “I like the current reporting method using the EGBC online reporting system.”
 - “Create a gap analysis/development plan and every member report according to their own needs and goals.”
 - “I don't like having to submit detailed accounts of CPD but I think it's probably necessary to maintain public and Governmental credibility of EGBC as the governing body of the profession.”
 - “A one sentence summary for each CPD activity would be a good compromise here.”

AREA OF FOCUS

Other regulators throughout Canada vary in the documentation they require; many require a detailed account of CPD activities that the regulator keeps on file. The CPD Committee will review this requirement to balance the effort of members with the regulatory requirement that the program be enforceable and transparent.

For members registered in other jurisdictions that already have to submit a detailed account of CPD activities, it is possible that a revised program would accept submission of this record as proof of CPD activities in British Columbia, cutting down on the duplication of effort.

FURTHER CONSIDERATIONS

For our final question about CPD program requirements, we asked survey respondents to comment on other factors that the CPD Committee should consider in the creation of a new program. After analysis of 854 responses, the most common themes for other factors the committee should consider included the following:

SURVEY QUESTION	COMMENT THEMES	RESPONSES		
		% OF RESPONSES	# OF RESPONSES	% OF ALL SURVEY TAKERS
What other factors should the CPD Committee take into account in the development of a revised CPD program?	Cost and/or availability of training	27%	216	8%
	Keep the current program	27%	216	8%
	Flexibility of the program	15%	121	4%
	Simplify the program overall	12%	96	3%
	Increase employer responsibilities in helping employees meet CPD requirements	4%	30	1%

Note: 2,061 respondents skipped this question.

AREA OF FOCUS

The CPD Committee notes that members are very concerned about the cost and availability of training, particularly for disciplines that have fewer members practicing in them (e.g., geoscience, high technology, and manufacturing). The Committee will consider this factor when designing the new program, with the goal to create a flexible program that is attainable for all members.

Members have also raised the suggestion to keep the current program. The CPD Committee is considering this as one option, with the possibility that the program could be improved slightly to add simplicity and flexibility while keeping the same general framework.