

# ALTERNATE ASSESSMENT FRAMEWORK FOR APPLICANTS UNABLE TO PROVIDE COMPLETE DOCUMENTATION

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Prepared for the BC Ministry of Jobs, Tourism and Skills Training  
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# INTRODUCTION

## Framework Purpose

Ensuring that immigrants and refugees are able to effectively use their skills, experience and qualifications in the workplace is an important step in supporting them to successfully settle in BC. Regulatory and certifying bodies can face difficulties assessing the qualifications of some immigrants and refugees who may be unable to provide documentation verifying their education and experience. The 1997 Lisbon Convention, to which Canada is a signatory, requires that even those unable to provide verifiable documents be given a fair credential assessment or other credible sources for work experience references. These applicants have a right to demonstrate their knowledge and skills and to have a transparent and fair assessment of their qualifications.

## Framework Development Process

The Ministry of Jobs, Tourism, and Skills Training contracted Queenswood Consulting Group to develop a framework that regulatory and certifying bodies in BC can use to evaluate applicants who are unable to provide complete documentation, such as refugees. This framework takes into account the diverse existing application assessment practices of regulatory bodies. This draft was developed based on literature and jurisdictional review of promising practices in refugee assessment, consultation with BC regulatory and certifying bodies through email and telephone interviews, with the support of a project Advisory Group to provide detailed input, and a draft framework circulated to all BC regulatory bodies in fall 2016.

Twenty-seven regulatory and certifying bodies, as well as four subject matter experts, provided input which helped to shape the framework. A research report summarising the framework development process and participants is included as [Appendix A](#).

Regulatory bodies reported receiving only a small number of applications with missing documentation which could not be obtained, either due to refugee status or other issues. Some had never had an applicant missing essential documentation. However, several had been considering the potential for such an application, due to the national focus on Syrian refugees.

## Framework Scope

The alternate assessment framework is presented as a resource to BC regulatory and certifying bodies. It may be voluntarily adopted, in whole or in part. Alternately, regulators may use this framework to develop their own process.

# DEVELOPING AN ALTERNATE ASSESSMENT PROCESS

The graphic below outlines common certification requirements, with requirements which may pose challenges for applicants with incomplete documentation, such as refugees in red – credentials and good character. The alternate assessment framework will provide options for alternate evidence for these certification requirements, as well as look at alternate outcomes for applicants who are not able to provide required documentation. Regulators may also take this opportunity to review their registration requirements and ask if there are any other safe ways to assess applicants’ competencies other than requiring documents that they cannot produce.

CREDENTIALS	Education	Original certificate Official Transcript from institution
	Work Experience	Employer References
KNOWLEDGE & COMPETENCY	Competency Assessment	Demonstrate current competency
	Jurisdiction Exam	Pass Exam
	Registration Exam	Pass Exam
GOOD CHARACTER	Character References	Non-family References
	Criminal Record	Criminal record check from country(ies) of origin
	Record of Registration	Letter of good standing

- OUTCOMES:**
- Full license / certification / registration
  - Partial license / certification / registration
  - Not licensed / certified / registered

Some regulatory bodies have policies which formalize an alternate assessment process. Most, however, rely on the formal section of their Bylaws which authorises the Registrar or Registration Committee to make a decision on a case by case basis based on the body of evidence provided. At the same time, regulatory bodies are expected to ensure that each applicant they license has the required competencies and abilities to practice the professions they regulate. Changes to assessment processes may require national consultation. Some regulatory bodies have a portion of assessment completed through a national organization, or have agreed with national partners to align assessment processes.

Regulatory or certifying bodies can use this framework to develop a process which aligns with their current registration practices. These alternate assessment processes are likely to be more resource intensive for both the regulator and the applicant. Smaller regulators, in particular, may find it difficult to provide alternate assessment without funding assistance.

The alternate assessment framework incorporates elements of prior learning assessment methodologies. The Quality Assurance for Recognition of Prior Learning in Canada Manual lists nine

guiding principles, which would also apply to an alternate assessment process. See Appendix D for a description of each principle, summarised below.

### Guiding Principles for Quality Assurance for Recognition of Prior Learning

- Accessible
- Respectful
- Rigorous
- Valid
- Professionally Supported
- Consistent
- Flexible
- Transparent
- Fair

The Framework includes a series of resources which may be helpful in guiding your organization to develop an alternate assessment process:

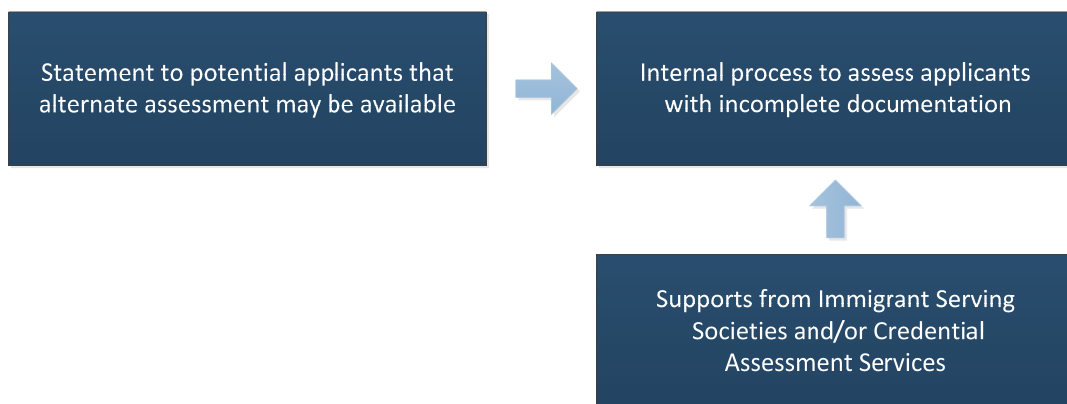
#### Resources to Raise the Issue

- A PowerPoint presentation summarising the issues faced by applicants unable to provide documentation, and outlining the Framework approach (attached separately)
- [Appendix B: Six scenarios that provide examples of applicants unable to provide complete documentation](#)

#### Resources to Develop a Process

- A PowerPoint summary of the Alternate Assessment Process flowchart, which can be easily altered to reflect your organization’s regulatory requirements (attached separately)
- [Appendix C: A checklist of Guiding Principles to review your draft process against](#)
- [Appendix D: Examples of Alternate Assessment Processes](#)
- [Appendix E: A list of Related Reading](#)
- [Appendix A: A Research Report summarizing the Framework Development Process](#)

There are three key elements to the approach outlined in the Alternate Assessment Framework:



Each element is outlined in the Framework and supporting materials that follows. Appendix B outlines several scenarios of potential applicants which regulatory and certifying bodies can use to test policies as they develop them.

# STATEMENT ABOUT ALTERNATE ASSESSMENT OPTIONS

Without a statement signalling the option for alternate assessment in specific circumstances, potential applicants may not apply. Regulators are concerned, understandably, about the potential demand for alternate assessment from applicants who may be able to access the documentation required, but at a cost of time and money.

During the development of this framework, though a number of BC regulatory bodies were found to already have policies or processes in place to address applicants with incomplete documentation, such as refugee applicants, none informed potential applicants about this option on their websites or in application guidelines. Though some alternate assessment measures had been in place for decades, immigrant-serving societies reported numerous clients unable to provide complete documentation who had been redirected to alternate careers on the assumption that, as stated on regulatory websites, documentation is a requirement for assessment. Immigrant serving societies were not aware of any alternate evidence option in any regulated profession.

Regulators consulted in the development of this framework preferred the option of a statement directing applicants unable to provide documentation to reach out to the regulator, rather than the publication of the policy or process itself. This statement should be published on regulator website and in applicant guides. Regulators should also consider describing the circumstances under which applicants may qualify for an alternate assessment process. Providing this information upfront will ensure transparency of the process and may help achieving consistency in handling of inquiries about the process.

Prior to drafting a statement, Boards of regulatory bodies must decide who may be eligible for alternate assessment. Though requiring further definition by each organization, some likely options are:

1. Refugees / Asylum seekers only
2. Any applicant who cannot present required evidence because it cannot be made available

A sample statement is provided, for regulators to review and revise:

**Sample Statement:** *Applicants unable to provide the requested documents for certification for reasons outside the applicants' control should contact [regulatory body] for further assistance. Financial cost of obtaining evidence is not an acceptable reason. The simplest and fastest assessment route is for applicants who provide requested documentation, even if obtaining those documents is difficult or expensive.*

Once an applicant has been approved for an alternate assessment process, however, applicants should be provided with information on:

- what the process will be;
- what information they will be asked to provide;
- what the occupational standard is; and,
- costs and expected timelines for the alternate assessment process.

### **Examples of evidence regarding the applicant’s circumstances**

- Letter from Immigrant and Refugee Board detailing refugee status
- Human rights reports, such as those from Amnesty International or Human Rights Watch
- Newspaper accounts that show what is/was happening in the applicant’s country
- National Documentation Package from the Immigrant and Refugee Board website: a compilation of publicly available documents on political, social, cultural, economic, and human rights conditions in each country

### **Example of Statement**

The Ontario College of Teachers has a thorough [statement](#) outlining their protocol for when an applicant finds it impossible to submit documents the College requires. The statement emphasizes the need for applicants to substantiate the reason they cannot obtain the document, provides several examples of such cases, and summarises the process to accept alternative documentary proof.

[excerpt, Where an Applicant Finds it Impossible to Submit Document(s) the College Requires, Ontario College of Teachers]

*Despite an applicant’s efforts and the available assistance from the College, some applicants may still find it impossible to obtain the documents required to support their application. In these cases the College will gather information from the applicant about their circumstances and render a decision about whether it is appropriate to rely on alternative forms of documentary proof.*

*For this process to apply, there must be a substantiated reason the applicant cannot obtain the documents which is outside the applicant’s control, and no other alternative forms of documentary proof exist. For example:*

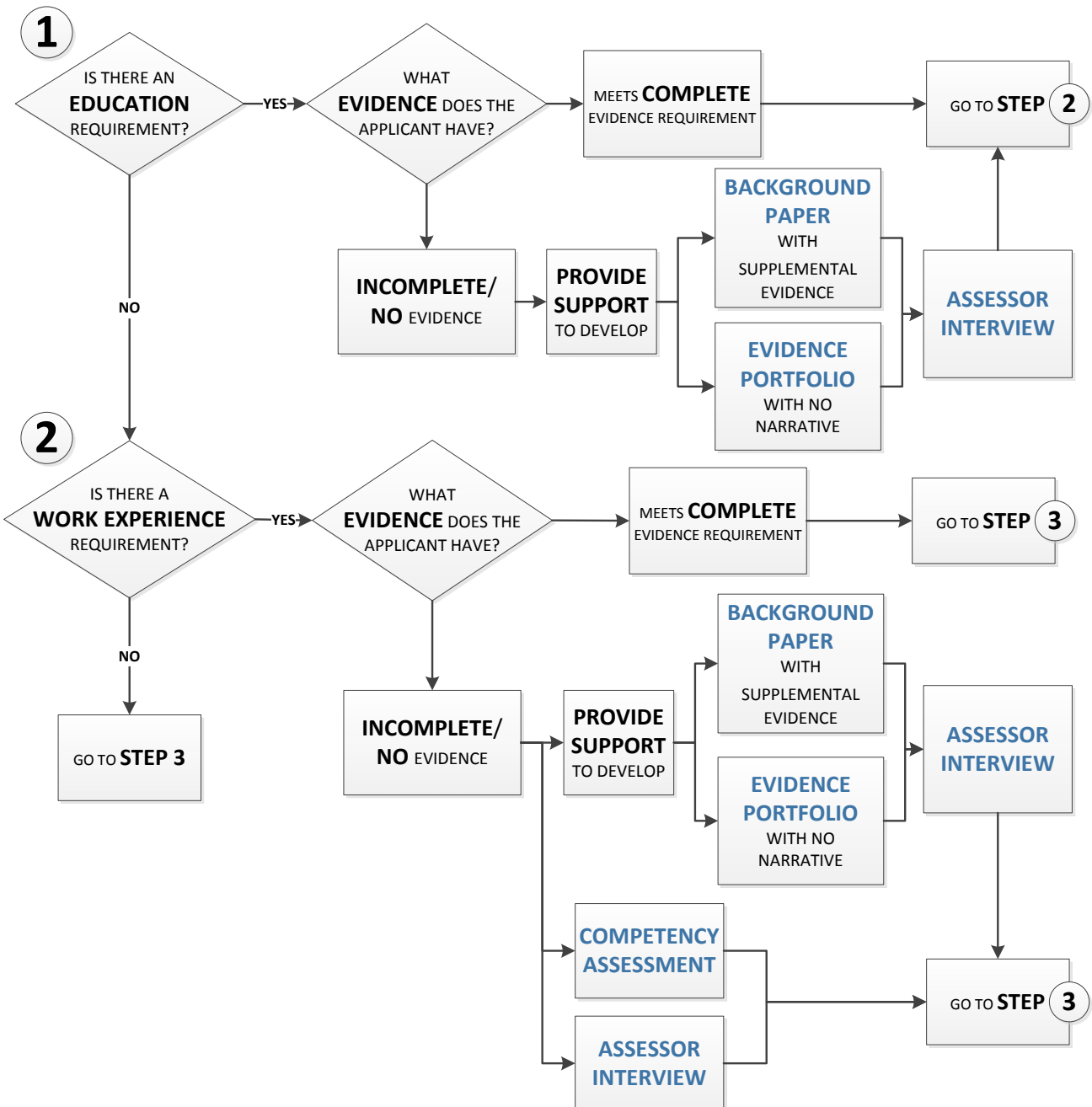
- *An institution (for example, school, governmental organization and so on) is unable to provide the required document because it no longer exists, is not functioning or has lost records due to war, upheaval, natural disaster or other crisis;*
- *An institution is refusing to provide the required documentation for an improper reason;*
- *Contacting an institution to request a document raises a well-founded fear of discrimination or persecution for the applicant.*

*This list of examples is not exhaustive and other circumstances “outside an applicant’s control” will be considered on a case by case basis. Any applicant indicating that it is impossible to obtain documents will be provided with an opportunity to describe their particular situation for consideration.*

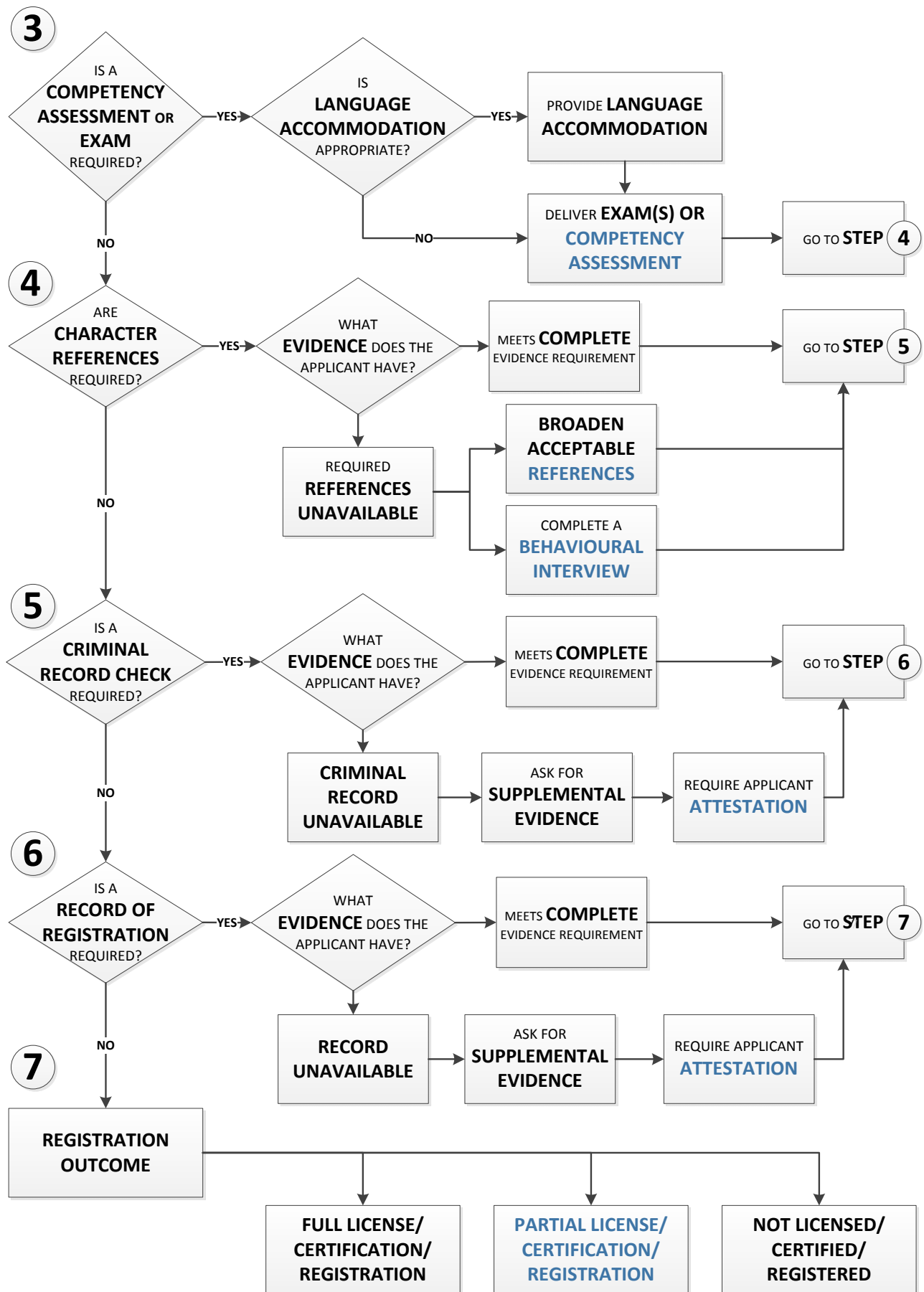
# ALTERNATE ASSESSMENT PROCESS

This flowchart can be used by regulatory bodies when developing a process to replace required missing documentation with alternate evidence.

Regulatory bodies have different certification requirements. The flowchart allows users to develop a process which reflects their organization’s processes and requirements. Each alternate evidence proposed is described in further detail on the pages following the flowchart.







## BACKGROUND PAPER

The purpose of the background paper is to reconstruct missing required documentation, with the support of any available evidence. A background paper is a description, written in the applicant's own words, of the applicant's circumstances, education, and / or work experience. Regulatory bodies could provide a high level outline requested in a background paper, such as the following content.

### What to include in a Background Paper

1. Why they could not obtain official documents from home institutions.
2. For missing education documentation: description of their academic credentials and background, such as:
  - name and level of qualification(s) obtained;
  - name of institution(s) where qualification(s) were obtained;
  - duration of study;
  - year(s) when qualification(s) were obtained;
  - name of program(s);
  - description of the content of the program(s), including modules, subjects/courses, assessment and workload (if transcript is not available)



*Describing the content of their academic program from memory can be very difficult. Regulatory bodies report that they sometimes receive course descriptions clearly copied from other institutions' calendars. A description of the occupation's entry-level competencies may help applicants to provide the information regulators are looking for.*

3. For missing professional certification or work experience documentation: description of professional experience, such as:
  - name of any professional qualification / registration / license obtained
  - name of institution issuing qualification(s)
  - date of qualification
  - description of any work experience, including: job title, dates of employment, description of responsibilities, references from employers or co-workers
4. A sworn attestation that the information provided is true.



*Some regulators expressed concern about the difficulty for applicants with English as a second language to produce such a paper in English, or the cost of translation they would face for the narrative and secondary documents. One regulator suggested seeking volunteer members who are fluent in the applicant's language who can assist with translation or interpretation. Immigrant serving societies may also be able to help applicants find affordable translation. This may not be applicable for applicants in occupations with an English language requirement, though some regulators deliberately put this requirement near the end of the registration process to allow applicants more time to improve their English.*

**See Evidence Portfolio for ideas of documentation which could be included with a Background Paper.**

## EVIDENCE PORTFOLIO

Some regulatory bodies ask only for alternate evidence to be presented, without requiring a narrative background paper. Others ask for an evidence portfolio to be submitted along with a background paper. Either way, evidence can be a more informal collection, or organized in a paper based or digital portfolio. Best practice suggests not limiting submissions to a list of acceptable evidence, but instead providing examples of evidence, and asking the applicant what he/she has available.

### Examples of academic documentary evidence

- Copies of diplomas (including photos or scans of the original)
- Student ID cards
- Applicant's name on a published lists of students
- Proof of tuition payment
- Proof of admittance to state examinations
- Witness statements from teachers or fellow students who were with applicant at school
- Academic papers, thesis, presentations made



*Some regulators have a database of recognized programs provided by post-secondary education institutions in other countries. If an applicant claims to have completed one of these recognized programs the regulator will have some information about the program to check the validity of the claim during an interview.*

### Examples of professional certification or work experience documentary evidence

- Copies of professional licenses or certificates
- Statements of professional standing / status (from a regulatory body)
- Membership cards for professional associations
- Log books, business licenses, pay stubs, record of employment
- Witness statements from other Canadian registered members of the occupation who are aware of the applicant's work in their country of origin



*One regulatory body used their database to help find registered members of their occupation who had been at school at the same time at the applicant or practiced their profession in the same country of origin, and might be able to serve as a witness.*

The [Immigrant Services Society of BC](#) provides support for clients to construct e-portfolios.

## More About Witness Statements

In their 2016 report, *Recognizing Refugee Qualifications*, World Education Services summarised recommended practices for gathering and accepting witness statements:

- ❑ *Ask the applicant for a list of witnesses who can attest to major background claims, such as enrollment in or graduation from an institution or employment at a specific company.*
- ❑ *Develop a preference list of types of witnesses, based on assumed reliability of their statements. For example, prioritize school officials, teachers, and professors, followed by peers.*
- ❑ *As another example, prioritize witnesses currently residing and working in your country first (e.g., the U.S.), followed by other major host nations with a similar legal system (e.g., Canada), followed by the home country (e.g., Syria) or a third country (e.g., Lebanon). Exclude relatives as potential witnesses.*
- ❑ *Develop clear instructions for witness, and a checklist of items to include in the statement.*
- ❑ *Allow witness statement to be open-ended (like the sworn statement) for opportunities to compare it against the applicant's claims and the context.*
- ❑ *Instruct the witness to describe his or her relationship to the applicant, including how many years they have known each other.*
- ❑ *Have the witness provide evidence of his or her identity, if possible.*
- ❑ *Ask the witness to have the statement notarized or signed by a lawyer for further legal weight.*
- ❑ *The number of witness statements needed will likely depend on the amount of other evidence the applicant can supply, the degree to which the institution of application needs to mitigate risk (as discussed earlier), and the number of witnesses available to the applicant, among others.*

## ASSESSOR INTERVIEWS

Information presented in the background paper or evidence portfolio can be verified, to some extent, through conversation with the applicant by a trained assessor, or interview panel.

### Assessor Selection

Many regulatory bodies already ask members of their Registration Committees and the Registrar to conduct such interviews in the case of appeals, or when applications require additional review. Other regulators work with volunteer members to interview applicants as part of the regular registration process. Having a panel of multiple assessors helps to reduce bias. Interviews which include technical questions are often done by panels of subject matter experts who have been trained as assessors.

Regulatory bodies may also have a member familiar with the applicant's educational system, or even as graduates of the same program. Regulatory body databases that track their members' country of training or educational program may make it easier to find these members. Having a member of the interview panel who is familiar with the training or practice of the occupation in the applicant's country of origin, as well as with their language, may help to put the applicant at ease. However, all assessors should be trained.

### Assessor Training

Assessors need to be trained:

- how to conduct an assessment in an objective, impartial, and fair way;
- to look for inconsistencies or possible signs of fraud;
- on a prepared interview tool, or how to develop questions using the occupational standard; and,
- with cultural competency to help them provide a non-discriminatory and inclusive process.

Initial training is important, as is ensuring that assessors either repeat training and/or regularly conduct assessments. It can be difficult to keep assessor skills current when only a small number of applicants require interviews.

### Interview Format and Questions

Assessor interviews help verify that information presented in an application is correct, and that an applicant has the knowledge and competencies expected of a domestically trained registrant. A portion of interview questions might therefore relate to reviewing information in the application. In a structured interview all candidates would be asked the same questions in the same order, and scored in a systematic way. However, regulatory bodies should assume that candidates might know each other and share information about the interview. Subject Matter Experts can develop structured interview questions related to a job analysis, which reflect the entry-to-practice standard and competencies being tested. Interviews allow individuals to describe what they know and can do. Questions can ask applicants to describe past events or experiences, what they would do in a hypothetical situation, or to demonstrate knowledge or skill required.

## **Behaviour Description Interviews**

With similar assessor training and selection requirements to a standard assessor interview, a regulatory body seeking supplementary evidence for character may wish to emphasize behavioural questions. These questions focus on detailed accounts of actual events from applicants' job and life experiences. The College of Respiratory Therapists of Ontario worked with a psychometrician to develop an interview modelled on the Behaviour Description Interview approach, as a valid and reliable means of predicting future performance based on past performance. Behaviour Description Interviews are rooted in occupational competencies identified in a job analysis, particularly those that focus on applying legal and ethical principles. Behaviour Description Interviews are less effective for candidates with limited work experience.

## **Provide Assessment Results**

Following an assessor interview, applicants should receive a report with official results of the assessment, and constructive feedback for the individual, such as license or certification achieved or not achieved, including specific details on learning gaps or differences.

## COMPETENCY ASSESSMENT

Some regulatory or certifying bodies already use practical assessments to verify competencies, providing applicants an opportunity to demonstrate their skills with common and fundamental tasks. However, practical assessments can be costly and logistically challenging to develop and deliver. As with interviews, these assessments must be performed by trained assessors, and be valid and reliable assessments of observable competencies. If a regulatory body did not already have a competency assessment in place, developing a new practical assessment is not a reasonable solution for a small number of applicants unable to provide complete documentation.

Regulatory and certifying bodies may be able to use existing resources to develop competency-based knowledge and practical assessment processes to assess applicants against the entry-level competency frameworks required by their occupation. These processes would provide applicants with a consistent and comprehensive assessment and report, while increasing their awareness of the complete set of competencies required in the Canadian context. This approach has been piloted by the Immigrant Employment Council of BC and BC Institute of Technology in their *Facilitating Access to Skilled Trades in BC* (FAST BC) project.

Where a regulatory or certifying body does not already have a practical assessment of competencies in place, they may be able to turn to an educational institution which offers programs in this field, and has a Prior Learning and Recognition process which includes a practical component.

## GOOD CHARACTER REFERENCES

Regulatory bodies are often not explicit about what good character means within the practice of a profession, which may mean applicants are uncertain if their history will preclude their application. Regulatory bodies are encouraged to be explicit about what they are looking for in good character certification requirements. This information could be included as part of Standards of Professional Practice and Conduct or Code of Ethics.

Some immigrants or refugees may be concerned about the safety of their friends and family in their country of origin if they are contacted, or not be easily able to reach non-family references.

### **Character References**

Regulatory bodies typically request non-family character references who have known the applicant for some period of time. Regulators may be able to accept shorter-term relationship character references in Canada, including from Immigrant serving societies, landlords, bridging training or other instructors, or supervisors of volunteer positions the applicant may have held.

Some immigrant serving societies, professional associations, and regulatory or certifying bodies have mentorship programs in place for internationally trained applicants. Applicants with incomplete character references could access these services and develop relationships with mentors, who might then be able to provide references.



## ATTESTATIONS FOR CRIMINAL RECORDS

Regulatory bodies, particularly in occupations working with vulnerable populations, commonly ask for applicants to submit a Criminal Record Check as a certification requirement. Individuals wishing to work in occupations which fall under the Criminal Records Review Act are required to undergo a criminal record check in BC, and some regulatory bodies require international applicants to provide a criminal record check from their home country. However, some immigrants or refugees may have criminal convictions related to their decision to leave their home country or have reason to fear contacting their government. It may also be very difficult for internationally trained applicants to arrange for international criminal record checks because these procedures may not exist in their home countries. Police departments outside Canada may not have resources, practices or services to provide criminal record checks outside their own jurisdictions, or have restrictions to which authorities within and outside their own jurisdictions they may provide police check information. This is not the case for all refugees, and applicants asking for alternate assessment in this area should be expected to provide supplemental evidence documenting the risk a criminal record check presents.

As part of the immigrant and refugee approval process, the Government of Canada does review criminal records, and applicants may be ineligible to claim refugee protection because of a criminal record including serious non-political offences. The *Immigrant and Refugee Protection Act* outlines categories of crime that would make a person ineligible for refugee status, including:

- convictions for offences, which if committed in Canada, would be a federal offence punishable by a maximum jail term of at least ten years,
- is believed to be part of organized or transnational crime, such as human trafficking or money laundering (no conviction required); or,
- convictions for crimes against peace, war crimes, crimes against humanity, or serious non-political crimes, such as drug trafficking, sexual assault against women or children, living on the avails of prostitution, smuggling firearms, and terrorism-related offences.

An approved immigrant and refugee will not have a criminal record in any of these areas. However, regulators may be looking for criminal records in other offenses.

Some regulators are now, instead, asking applicants to provide a sworn statement or attestation that they do not have a criminal record, or were in good standing with their regulatory body. Regulatory bodies may require that the attestation be simply signed and witnessed, or signed and formally notarized. Regulators provide clear instructions to the applicant about what to include in the statement.

Some regulators for occupations which work with vulnerable people may find attestations to be insufficient. In these instances, regulators may be able to ask the candidate to supply witness statements from other members of the profession in their country of origin as to their lack of criminal record. However, there may be candidates who are unable to risk having a criminal record check performed due to potential threat to any family remaining in their country of origin.

## ATTESTATIONS FOR LETTERS OF GOOD STANDING

Immigrants such as refugees may be isolated from professional communities, and government related regulatory bodies may be unwilling or unable to provide letters of good standing. As with attestations for criminal records, applicants asking for alternate assessment in this area should be expected to provide supplemental evidence documenting the challenge they face in providing a letter of good standing.

Accepting applicants' attestations on any issues of good standing they have had with historical practice, or offering limited registration subject to a fixed period to determine good character.

Witness Statements from other members of the profession now in Canada may also be able to speak to an applicant's professional standing in their home country.

## **PARTIAL, LIMITED, CONDITIONAL, OR SUPERVISED LICENSES**

Several BC regulatory bodies reported using a partial, limited, conditional or supervised license as a potential outcome for applicants unable to provide complete documentation. Others use an intern status for applicants in this situation. In all forms, this is typically an approved class of license, with clear criteria and a process to move to a full license within a set period of time.

This outcome assumes that industry will be willing to take on an employee with this class of license, and provide them with the scope of work needed for the applicant to move to full licensure.

Regulatory bodies who are interested in developing these kinds of conditional or partial licensing may need to change their Bylaws or their Act, requiring a lengthy process. Not all regulators have been granted the authority to grant conditional limited licenses.

Regulators or certifying bodies may also be able to advise applicants to seek certification or employment in an alternate occupation for which their qualifications are a better fit.

# SUPPORTS

Alternate assessment processes are time and resource intensive for both applicants and regulatory bodies. Both may be able to access supports from a variety of sources.

## **Immigrant Serving Societies**

Preparing an alternate body of evidence, whatever the process is, is likely to be an onerous process for applicants, particularly if English is a second language. Regulators may be able to provide some help for applicants to answer questions and support the development of the application. However, registration staff working with internationally trained applicants could also encourage applicants to seek help with the process from any immigrant serving society the applicant is connected to. If the applicant is not connected to any immigrant serving society, the regulatory body staff could familiarise themselves with local resources, and provide references.

Regulators can refer applicants not yet connected to an Immigrant Serving Society through this Citizenship and Immigration link: <http://www.cic.gc.ca/english/newcomers/map/bc.asp>

## **Credential Assessment Services**

Credential Assessment Services, such as World Education Services, may be able to provide a report on the substantial equivalence of the academic qualifications cited, without being asked to assess the validity of an applicant's credentials. Some regulatory bodies may also have gathered information on past applicants from the same school which can be used the same way. WES already produces Country Profiles, which provide information on education systems in other countries.

## **Staff Training and Sensitivity**

Regulatory body staff involved in the licensure process, assessors, or volunteers serving on registration or registration appeals committees may benefit from training in cultural sensitivity and awareness.

## **Translation**

Many immigrants may experience financial difficulties providing translated materials. Refugees, who may be required to submit significant amounts of supporting documentation may have the greatest difficulty with translation. Several BC regulatory bodies assist by matching members who speak the applicant's primary language to the applicant to assist with translation, or with interpretation of secondary materials in lieu of a formal translation. Regulatory bodies may also assist applicants in locating and accessing affordable translation resources through immigrant and refugee serving societies. This may not be as applicable for applicants in occupations with an English language requirement, though some regulators deliberately put this requirement near the end of the registration process to allow applicants more time to improve their English.

# APPENDIX A: ALTERNATE ASSESSMENT FRAMEWORK DEVELOPMENT RESEARCH REPORT

## Background

Ensuring that refugees are able to effectively use their skills, experience and qualifications in the workplace is an important step in supporting refugees to successfully settle in BC. Regulatory and certifying bodies can face difficulties assessing the qualifications of refugees, who may be unable to provide documentation verifying their education and experience. This can also be an issue for other applicants with incomplete documentation.

The Ministry of Jobs, Tourism, and Skills Training contracted Queenswood Consulting Group to develop a framework that regulatory and certifying bodies in BC can use to evaluate applicants who are unable to provide complete documentation, such as refugees.

## Project Approach

Queenswood’s approach to develop this framework included:

- Literature review to identify alternate evaluation approaches, opportunities, and challenges;
- Email survey and telephone interviews of BC regulatory and certifying bodies and other subject matter experts to identify interest in, work underway, or challenges in development of an alternate approach;
- Project Advisory Group to provide detailed input on a draft framework; and,
- Circulating the draft framework and supporting materials to BC regulatory and certifying bodies for comment, and revising as appropriate.

## Subject Matter Expert, Regulatory and Certifying Body Participation

Queenswood thanks all the subject matter experts, regulatory and certifying bodies who took the time to participate in the project. In total, 27 regulatory and certifying bodies, and four subject matter experts provided input into the framework through the survey, interview, advisory group, and/or review of the final draft. A full list of participating organizations is included at the end of this report.

	Survey	Interview	Advisory Group	Review Draft
Number of participants	12	17	4	19

## BC Regulatory Landscape

There are over 60 regulatory and certifying bodies in BC, with a variety of regulatory requirements and processes in place to determine right to practice or title. Applicants in some occupations have their credentials assessed through a national organization, prior to applying to a regulatory body in BC, while others start with BC, and may or may not write a national registration exam. Credential assessment may focus on education, or work experience, or both. In some occupations, application forms are structured around competencies, and applicants relate their education and experience to these competencies. However, in most, regulatory bodies must determine the substantial equivalency of the qualifications to Canadian requirements.

**Key Findings:**

- **There is no consistent certification requirement across all regulated occupations, though there is typically some form of assessment of credentials, good character, and knowledge and competency.**
- **Documentation difficulties typically impact assessment of credentials and good character.**
- **No regulatory body is solely dependent on one certification requirement.**

### Challenges in Providing Documentation

Many refugees are unable to take all relevant documents with them, and often cannot access documents directly from home institutions which are destroyed, closed, or refuse to issue documents to the refugee. Even if they are able to bring documents with them, regulatory bodies often require applicants’ home institution to send the documents directly, as a mechanism to reduce risk of fraud. Some refugees may fear retribution against friends or family members still in their home country if they request such documents.

Refugees may also face challenges in:

- Accessing professional references to verify work experience
- Letters of good standing from regulatory bodies
- Character references and criminal record checks
- Lack of generally requested forms of ID
- Gaps in experience due to refugee experience (if a currency requirement exists)

Regulatory and certifying bodies note that other internationally trained applicants may have difficulty providing required documentation. Immigrants are often not aware of the documentation requirements prior to immigrating, and may have to go to great expense to obtain documents after arrival. Other applicants, like refugees, may not be able to access documents from home institutions, and may have legitimately lost documents. This alternate framework is designed with refugees or asylum seekers in mind, but could be used by regulatory bodies to address documentation challenges for other applicants.

The graphic below outlines common certification requirements, with requirements which may pose challenges for refugees in red – credentials and good character.

CREDENTIALS	Education	Original certificate Official Transcript from institution
	Work Experience	Employer References
KNOWLEDGE & COMPETENCY	Competency Assessment	Demonstrate current competency
	Jurisdiction Exam	Pass Exam
	Registration Exam	Pass Exam
GOOD CHARACTER	Character References	Non-family References
	Criminal Record	Criminal record check from country(ies) of origin
	Record of Registration	Letter of good standing

## Legal Precedent

Each regulatory or certifying body is granted authority for self-regulation through an Act, with registration requirements and assessment processes typically outlined in more detail through Bylaws or Policies. A review of these Acts found none where the Act would have to be changed in order to enable an alternate evaluation framework for refugees or other applicants with incomplete documentation. Most Bylaws or Policies refer to requirements being met to the satisfaction of the Registrar and / or Registration Committee.

Canada is a signatory to the Lisbon Recognition Convention (1997), which requires that even those without verifiable documents be given a fair credential assessment. The Immigrant and Refugee Protection Act (2002), and BC Human Rights Code further protect refugees against discrimination, as do fair-access laws in some other Canadian jurisdictions. The Ontario Fairness Commissioner has further clarified that regulatory bodies are also required to communicate these alternate processes to applicants.

### Key Findings:

- Under the Lisbon Convention, regulatory bodies are obligated to find ways to help applicants that lack the full documentation needed.**
- Regulatory and certifying bodies have the legal authority needed to implement an Alternate Evaluation Framework.**

## Interest in Alternate Assessment Framework

Of the 66 regulatory and certifying bodies contacted, 27 (41%) were able to take the time to provide input into the framework in some way. Four responded that the framework was not applicable to their regulatory process. The first contact with regulators asked about their interest in an alternate assessment framework, and while almost half of regulators expressed interest, few reported refugee applicants, and no one had ever had an applicant with entirely missing documentation. Of those expressing interest, some already had a process in place which could be used to address applicants with incomplete documentation. However, most of these processes had not been designed with refugees in mind, and regulators expressed interest in improving these processes. None of these bodies had information on their website about alternate processes to pursue registration without documentation. One Immigrant and Refugee Serving society expressed surprise that these alternate processes exist, reporting that clients and employment counsellors would typically be guided by information on the website as to requirements.

### Key Findings:

- Regulatory and certifying bodies may have formal or informal processes in place to deal with the rare cases of refugee applicants, but not advertise those processes at all. This may result in a diminished number of applicants applying without complete documentation.**
- Regulatory bodies expressed concern that sharing alternate assessment policies might elicit more fraudulent applicants. Most were open to the idea of a statement for refugees (or applicants with incomplete documentation) to contact the regulatory body to discuss.**

## Emerging Alternate Evaluation Practices

Through the literature review and consultation with regulatory and certifying bodies, a number of alternate evaluation practices have been identified. One notably helpful resource had been recently published by World Education Services (WES), [Recognizing Refugee Qualifications: Practical Tips for Credential Assessment](#). This

Special Report outlines challenges experienced by refugees, requirements to accommodate these challenges, and presents best practices in alternative credential assessment. WES also ran a pilot in Syrian refugee credential assessment through fall 2016.

Alternate Assessment Practices were found in six other jurisdictions: Norway, Netherlands, UK, Denmark, Germany, and Australia. These practices are summarized below:

Norway (NOKUT) - Recognition Procedure for Persons without Verifiable Documentation:

- Map applicant’s background using standardized questionnaire, and describing courses in detail
- Preliminary interview by NOKUT to assess qualifications
- Written and oral assessment by expert committee to substantiate applicant’s claims
- Final, legally binding assessment decision and issuing of recognition document

Netherlands – Portfolio creation

- Central Agency for the Reception of Asylum Seekers assists applicants to create a portfolio
- Dutch Centre of Expertise for International Credential Evaluation worked with refugee agencies and business community to develop a credential evaluation instrument for information provided by refugees (still requires copies of education documents)

United Kingdom - Assessment of Prior Learning

- Use a mix of methods such as criterion oriented interviews, workspace observation, portfolios, or other testing to assess competencies gained through informal and formal undocumented learning, and compare with learning outcomes of formal qualifications.
- Final product is an Assessment of Prior Learning Certificate

Denmark (DAUI) – Single agency (DAUI) coordinates and assesses foreign nationals’ credentials

- Regulatory body makes decision to permit applicant to practice the profession
- DAUI publishes country handbook to provide advisory information on general equivalencies of foreign qualifications with Danish qualifications
- Non EU / Nordic citizens require documentation certified by home country embassy, public authority or professional association

Germany – New 2012 BQFG law (Berufsqualifikationsfeststellungsgesetz)

- Specifies alternative measures for missing documents such as aptitude tests, compensation course, expert interviews; Partial recognition common

Australia - Field-specific bridging programmes

- Supports preparation for pre-accreditation exams and other field-specific tests

The table below summarizes alternate assessment used in other jurisdictions by registration requirement.

Requirement	Alternatives
Verifiable Work Experience	Accept copies Background Paper, with supplemental evidence if available Interview
Currency of Experience	Technical Interview by Subject Matter Expert Competency Assessment
Good Character	Refresher courses or supervised practice
Generally requested ID	Attestations
Verifiable Work Experience	Accept Immigrant and Refugee Board letters



## Literature Reviewed

- CICIC, Revised Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications, 2010
- Citizenship and Immigration Canada, Population Profile Syrian Refugees, 2015
- Council of Europe Working party on refugee's qualifications, 1999
- EAIIE webinar: qualifications recognition for refugees, 2016
- EAR-HEI Consortium, Recognition of qualifications holders without documentation, 2016
- Engineers Canada, Facilitating the integration of convention refugees, 2016
- ENIC-NARIC, Recognize qualifications held by refugees: guide for credential evaluators, 2016
- ICES, Report: Seminar on Recognition of Refugee Qualifications, 1999
- International Organization for Migration, Recognition of Qualifications and Competencies of Migrants, 2013
- Krahn et al, Educated and Underemployed: Refugee Integration into the Canadian Labour Market, 2000
- Parliamentary Information and Research Service, Recognition of the Foreign Qualifications of Immigrants, 2004
- World Education Services, Recognizing Refugee Qualifications: Practical Tips for Credential Assessment, 2016

## Framework Development Participants

### Regulatory and Certifying Bodies

- Applied Science Technicians and Technologists of BC
- Architectural Institute of BC
- Association of BC Forest Professionals
- Association of BC Land Surveyors
- Association of Professional Engineers and Geoscientists of BC
- BC College of Midwives
- BC College of Podiatric Surgeons
- BC College of Social Workers
- BC Safety Authority
- BC Society of Landscape Architects
- BC Teacher Regulation Branch
- Canadian Alliance of Physiotherapy Regulators
- Canadian Veterinary Medical Association
- College of Dietitians of BC
- College of Massage Therapists of BC
- College of Physicians and Surgeons of BC
- College of Psychologists of BC
- College of Registered Psychiatric Nurses of BC
- College of Veterinarians of BC
- Consumer Protection BC
- Emergency Medical Assistants Licensing Board
- Industry Training Authority
- Ministry of Forests Land and Natural Resources
- National Nursing Assessment Service
- Pharmacy Examining Board of Canada
- Real Estate Council of BC
- WorkSafeBC

### Subject Matter Experts

- Facilitating Access to Skilled Trades in BC (FAST BC)
- Immigrant Serving Society of BC
- Ontario Office of the Fairness Commissioner
- World Education Services

## APPENDIX B: ALTERNATE ASSESSMENT SCENARIOS

*The following brief profiles are intended to help regulatory and certifying bodies consider how they might assess applicants in similar situations.*

1. Jabirah fled her country with photos of her degree, transcript, and registration certificate on her phone, but has no paper certificates or official documentation. Her university, which is internationally ranked as a good university, is in a conflict zone, and is closed for an undetermined period of time.
2. Yves was able to have official transcripts sent from his university, but has been unable to provide any references for his work experience. The city in which he worked has been destroyed, and his references are dead or unreachable.
3. Raamah completed both an undergraduate and graduate degree, and is known and published internationally in his field. However, he had to leave his home quickly, and was unable to bring any documentation with him. His university requires him to request official transcripts in person, and will not accept a family member doing so in his place.
4. Chen completed an undergraduate degree at a private college which has now closed. She has an official copy of her degree, an unofficial copy of her transcript, and calendar descriptions of the courses, which appear to be substantially equivalent of the training required for her occupation in Canada. It is not possible to verify Chen's attendance at the institution with the administration there.
5. Addisu has a copy of his original degree and registration certificate, as well as documentation of his work experience. However, no verification is available from either his educational institution or regulatory body, both of which are government controlled. Addisu was imprisoned by the government for voicing political opposition.
6. Haile has no evidence of his education, registration, or work experience. He spent time in a refugee camp before securing a place on a liferaft crossing the Mediterranean, and the raft sank. He lost the few possessions he had, and is the only surviving member of his family. He can describe his degree and work experience, but has no evidence or references.

## APPENDIX C: GUIDING PRINCIPLES

Excerpt from *Quality Assurance for Recognition of Prior Learning (RPL) in Canada Manual*, 2015, p.7-8

### **Accessible**

Processes provide information, advice and access by being:

- responsive to applicant questions
- cost-efficient for both applicant and organization
- timely in both frequency of assessment and gap filling options
- adult learner-centred, voluntary, available, and inclusive of all abilities and differences

### **Consistent**

Decision-makers (advisor, assessor, administrator) work together to be consistent with criteria, training, tools, procedures, and outcomes.

Definitions must be agreed across sectors to allow for transferability.

### **Fair**

Processes are unbiased and recognize a wide range of ways people learn. Therefore, applicants are allowed optional ways to prove learning.

An appeal mechanism is provided.

Policies and procedures of the organization align with RPL principles.

### **Respectful**

Processes reduce barriers by:

- being non-discriminatory, culturally appropriate and inclusive
- value uniqueness of the individual
- using plain language to ensure all communications are clear

### **Valid**

Assessment methods align with the expected measures of achievement (e.g. competencies, occupational standards, goals, or outcomes).

### **Flexible**

Assessment methods are time and cost efficient.

A variety of effective assessment options are available.

### **Rigorous**

RPL assessment methods:

- reflect the purpose for the required learning
- have equivalent expectations to traditional assessment methods
- are conducted by subject matter experts
- meet requirements of work or performance criteria

**Transparent**

Information uses explicit and plain language to be understood by all stakeholders (applicants, advisors, assessors, administrators).

Policies, processes, and criteria are complete, fully disclosed, and accurate. For example:

- process steps are clear and simple to follow
- reasons are given for any action needed to complete the process
- methods of assessment and learning criteria are clearly stated
- results of RPL assessment are provided, including gaps and achievements

**Professionally Supported**

All staff involved in RPL services receive initial and ongoing training for their RPL functions. (e.g. advising, assessment, development and systems administration or other related services).

## APPENDIX D: EXAMPLES OF ALTERNATE ASSESSMENT

### Background Paper

The Association of Professional Engineers and Geoscientists of BC (APEGBC) adopted a new policy in 2016 for applicants who cannot provide traditional documentation. An acceptable alternate means of proof for academic documents is a detailed description from the applicant in his or her own words of his or her academic qualifications, listing the institution attended, the coursework completed, the date of graduation and all other details relevant to their academic criteria, with supporting evidence if available. APEGBC may provide a template related to the Canadian Engineering Qualifications Board Syllabus to assist the applicant and examiners. Applicants are then asked to provide an attestation that the description provided accurately reflects the education they have completed. Responses are verified through a technical interview.

The Applied Science Technicians and Technologists of BC (ASTTBC) provides an online application process that guides any applicant through a description of competencies related to any of their 18 disciplines and 10 technical occupations of certification. The entire application becomes a type of structured Background paper.

### Evidence Portfolio

In Norway, credential assessment is done through a centralized body called NOKUT, which implements the Recognition Procedure for Persons without Verifiable Documentation for applicants with incomplete documentation. Applicant proficiency in English or Norwegian is a mandatory requirement. They use a 40-page standardized questionnaire to map applicant's background. Staff conduct a preliminary interview once the questionnaire is complete, followed by a written and oral assessment by expert committee. This process is free, and typically takes two months.

### Witness Statements

The Pharmacy Examination Board of Canada (PEBC) developed a protocol for applicants unable to provide documentation sent directly from the issuing institution, using alternate assessment relying on sworn witnesses along with other supporting evidence. PEBC asks the applicant to identify witnesses who attended the same institution as the applicant at around the same time. Witnesses are asked to attest to the enrollment or graduation of the applicant. PEBC looks for up to three witnesses. If the applicant is unable to supply names, PEBC uses its extensive database of applicants to find potential witnesses. If witness statements are satisfactory, the applicant still sits the certification examinations required of all international applicants.

### Assessor Interviews

The Industry Training Authority of BC uses assessor interviews by subject matter experts when there is insufficient documented evidence, but an otherwise strong application. Assessors are recruited and trained, and training and assessment experience is kept current. Assessors review of the application evidence and interview the applicant to explore additional areas where they may have gained experience.

## **Attestations**

Since 2009, the Canadian Alliance of Physiotherapy Regulators have had a process in place allowing applicants in some exceptional cases to make sworn statements in lieu of required documentation, along with supporting evidence.

## **Competency Assessment**

The College of Massage Therapists of BC requires applicants from non-regulated provinces or internationally educated massage therapists to complete a Credential and Prior Learning Assessment. This assessment includes a Clinical Competence Assessment, with both written examinations and performance-based assessment, for a total fee of \$1,600. The Clinical Competence Assessment is an assessment of knowledge, hands-on, critical thinking, and clinical application skills.

## **Conditional Licensing**

The BC Society of Landscape Architects have an alternative assessment stream, which can be used in outstanding circumstances for applicants without evidence of their formal degree. An alternative stream in outstanding circumstances will allow an individual who has been employed for six years under approved Principals in the field of landscape architecture to be considered without a formal degree, however, substantial professional assessment coursework must have been completed in addition to intern training and standard course requirements.

## **Other International Examples**

In the Netherlands, the Central Agency for the Reception of Asylum Seekers assists applicants to create a portfolio, documenting their experience.

The United Kingdom uses a mix of methods as part of their Assessment of Prior Learning including criterion oriented interviews to assess competencies.

In Germany, a 2012 Federal Law on the Recognition of Foreign Qualifications (BQFG) specifies the alternative measures for missing documents, including expert interviews.

In Denmark a single agency, DAUI, coordinates and assesses foreign nationals' credentials, though regulatory bodies make decisions to permit applicant to practice the profession. DAUI publishes a country handbook to provide advisory information to job seekers and employers as to the general equivalences of foreign qualifications with Danish qualifications.

## APPENDIX E: RELATED READING

World Education Services, *Recognizing Refugee Qualifications: Practical Tips for Credential Assessment*, 2016. <http://wenr.wes.org/research>

Canadian Association for Prior Learning Assessment (CAPLA), *Quality Assurance for Recognition of Prior Learning in Canada Manual*, 2015. <http://capla.ca/>

EAR-HEI Consortium, *Recognition of qualification holders without documentation*, 2016. <http://eurorecognition.eu/>

Engineers Canada, *Facilitating the integration of convention refugees*, 2016. [www.engineerscanada.ca](http://www.engineerscanada.ca)

ENIC-NARIC, *Recognise qualifications held by refugees: guide for credential evaluators*, 2016. [www.enic-naric.net](http://www.enic-naric.net)

International Organization for Migration, *Recognition of Qualifications and Competencies of Migrants*, 2013 <https://publications.iom.int/>