
Statutory Framework

Procedure Reference **Exemption Requests to Council**

The following material outlines the statutory framework within which an exemption request to Council is considered.

The principal object of the Ontario Association of Architects (OAA) is to regulate the practice of architecture and to govern its members in order that the public interest may be served and protected. Among its core mandates is the requirement to establish, maintain, and develop standards of qualification for the practice of architecture. Standards of qualifications are administered through licensing processes that are applied consistently and in accordance with the *Architects Act*, (the Act) and Regulation 27: General (the regulations). Section 13(1)¹ of the Act establishes the requirements for licence and section 13.1² the requirements for limited licence, which include academic and experience requirements, examinations and Council approved courses of study.

Sections 31³ and 32⁴ of the regulations enumerate the specific academic, examination, and experience requirements for, respectively, licence and limited licence. However, upon application, requests for exemption from some of the legislated requirements may be considered by OAA Council as set out in Section 33:

33. The Council may, where it is of the opinion that the applicant's qualifications, knowledge and experience so merit, grant an exemption from all or part of the academic and experience requirements set out in this Regulation.

OAA Council shall respond to all complete requests for exemption to the academic, examination, and/or experience requirements for licence or limited licence. The powers and jurisdiction of Council must be exercised within the principles set out in the Act and regulations. Exemption requests are not an avenue to bypass the academic, examination, and experience requirements that have been set by the regulations or to provide a right of review or appeal from the decisions of either the [Canadian Architectural Certification Board \(CACB\)](#) or [Experience Requirements Committee \(ERC\)](#).

The purpose of Section 13(1)(d) and (e) of the Act and Section 33 of the regulations is to provide a procedure for an applicant who can demonstrate circumstances their qualifications, knowledge, or experience merit exemption.

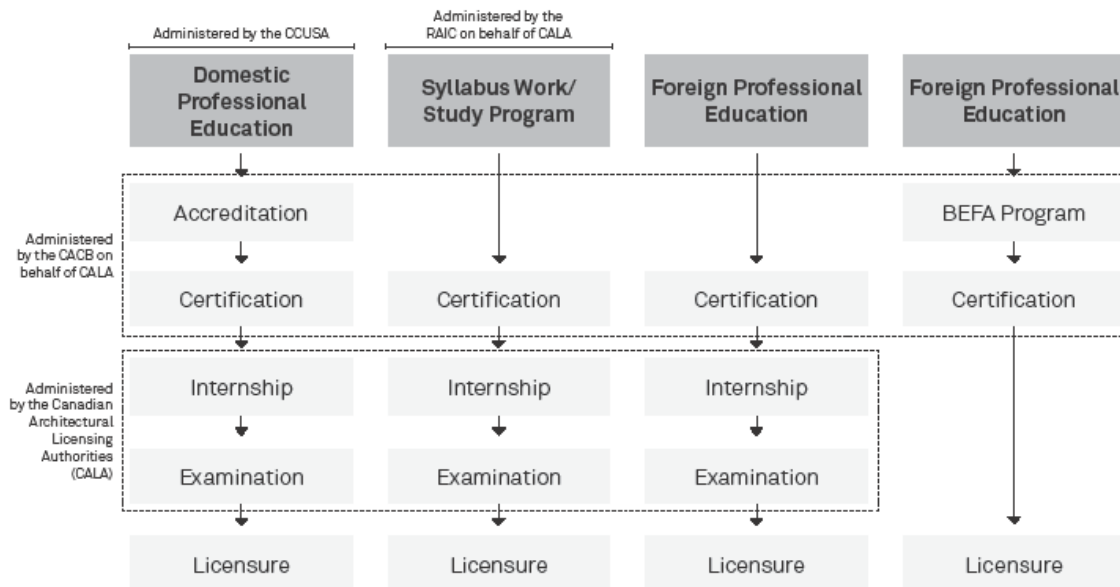
Background - Licence

Provincial and territorial legislation has given each professional regulatory body both the authority and the responsibility to establish standards of admission and competence for applicants seeking to become licensed to practise architecture in their respective jurisdictions.

Regulatory Organizations of Architecture in Canada (ROAC) have worked collectively to develop and adopt nationally recognized standards of competence. These standards are embodied in the [Canadian Standard of Competency for Architects](#), which establishes consistent criteria that licence candidates must meet regardless of their chosen path to licensure. Such standards facilitate reciprocal registration/licensing across Canada under a reciprocity agreement entered

by ROAC jurisdictions.

Within Canada, the required professional competence is normally obtained and demonstrated through a combination of formal education, supervised experience, and professional examinations. The regulators have collectively agreed to endorse a variety of pathways to licensure in order to allow broad yet comprehensive and robust access to the profession for candidates from diverse circumstances. These include options for domestic and international applicants and are included in the licensure diagram below.



Qualifications

For the purposes of assessing the merits of an exemption request, Council will need to consider the objective of each legislated licence or limited licence requirement and appreciate how it serves to advance the core function of the OAA – namely, how to protect the public through the establishment, maintaining, and development of standards of qualification for the practice of architecture.

Council will need to consider if applications for exemption illustrate how the licence or limited licence requirements have been met by alternative means and/or the applicant's qualifications, knowledge, or experience merit exemption.

Academic Qualifications: Licence

University professional degree programs in architecture may last from five to seven years and provide training that includes critical analysis and integration of knowledge. Canadian programs are currently offered at both the pre-professional level (e.g. BAS, BES) and the professional level (M.Arch.); however, the professional degree is granted only at the master's level. Find out which universities offer accredited programs by visiting the CACB's [website](#).

All applicants must hold certification of their academic qualifications from CACB or demonstrate to Council's satisfaction that acquisition of such a certificate has not been possible, by providing documented evidence of the CACB rejection and the grounds for that rejection. Further, they must demonstrate, to the satisfaction of Council, that their qualifications, knowledge, and experience merit an exemption from this education requirement.

By virtue of [By-Law Number 1](#), the OAA, through agreement with other Canadian architectural regulators, constituted the CACB for the purpose of, among other things, certifying the educational qualifications of candidates seeking licensure to practise architecture in a Canadian jurisdiction.



The ROAC jurisdictions have established common education standards as detailed in the [CACB Conditions and Terms for Accreditation](#) for professional degree programs in architecture and in the Conditions and Procedures for the Certification of Educational Qualifications ([Canadian Education Standard](#)). The accreditation of professional programs in architecture and the certification of education qualifications of architecture graduates are conducted under the auspices of the CACB in accordance with the standards set by the ROAC jurisdictions.

The CACB applies the Canadian Education Standard, which has been chosen to ensure the assessments are equitable in each case, while accommodating the varied backgrounds and circumstances of the applicants. This results in standards for each category of applicant that are equivalent but not identical.

When considering whether an applicant's qualifications, knowledge, and experience merit an exemption from this education requirement, Council should be mindful of the CACB assessment criteria.

Curriculum Standards

A CACB-accredited professional program in architecture prepares students to enter the practice of architecture as architectural interns. Accreditation is based on the overall quality of the program objectives and the specific performance criteria that students meet through coursework. The CACB only awards accreditation to professional degree programs in architecture. A CACB-accredited professional program in architecture is defined as the totality of a student's post-secondary education culminating in a designated professional university degree, which may be a Bachelor of Architecture (BArch) or a Master of Architecture (M. Arch) degree. The Programs include:

- a minimum of five years of post-secondary study culminating in a Master of Architecture degree, which follows a pre-professional bachelor's degree, except in Quebec, where the minimum is four years of professional studies following two years of CEGEP;
- a minimum of six years of post-secondary study culminating in a Master of Architecture degree, which follows a bachelor's degree in any discipline and includes a minimum of three years of professional studies in architecture; or
- a minimum of five years of post-secondary study culminating in a Bachelor of Architecture degree. In keeping with the principle of outcome-based Accreditation, the CACB does not restrict the structure of a professional Program and/or the distribution of its coursework.

The CACB accreditation is based on the overall quality of the program objectives, the specific performance criteria that students meet through coursework, and the program performance criteria, grouped as follows:

Program Performance Criteria

- Professional development
- Design education
- Global perspectives and environmental stewardship
- Collaboration, leadership, and community engagement
- Technical knowledge
- Breadth of education

Student Performance Criteria

- Design
- Culture, communications, and critical thinking
- Technical knowledge
- Comprehensive design
- Professional practice

If the degree or diploma is determined to meet the CACB equivalent degree in length and general content, the academic record is evaluated against the Program Performance Standards. This two-part assessment is the basis for the Assessment Committee's recommendation. The Program Performance Standards are consistent with, but not identical to, the Student Performance Criteria found in the CACB's Conditions and Procedures for Accreditation, which are used in the



evaluation of university professional programs in architecture.

Performance Standards

The applicant must demonstrate they possess the knowledge and skills defined by the Performance Standards. These knowledge and skills are the minimum for meeting the demands of an internship leading to registration for practise. For academic certification, the CACB Assessment Committee will assess the performance standards based on transcripts and detailed course descriptions. The performance standards encompass two levels of accomplishment:

- “Understanding” means the assimilation and comprehension of information without necessarily being able to see its full implication; and
- “Ability” means the skill in using specific information to accomplish a task, in correctly selecting the appropriate information, and in applying it to the solution of a specific problem.

The CACB will review the applicant’s submission, including the program description and detailed course outlines, to determine if the applicant has met the CACB standards

An alternative way to gain CACB certification in Canada is through the “apprenticeship” [Syllabus Program](#) offered by the Royal Architectural Institute of Canada (RAIC). The RAIC offers an alternative through a direct, self-paced program of academic studies, design studios, and practical experience leading to the RAIC Professional Diploma in Architecture, which is accepted by the CACB as having achieved the performance standards required for certification of their education.

The exemption process in the *Architects Act* is not an alternative pathway to licensure. The standards of educational qualifications have been developed over several decades. The OAA has delegated the administration of the educational assessment process to the CACB, which is aligned with all other Canadian architecture licensing bodies.

In light of the nuance, rigour, and complexity of the current framework for assessing whether an applicant has met the minimum educational requirements, strong deference ought to be given to the CACB’s framework. Any decision which departs from the CACB’s framework may result in the unintended consequence of eroding a consistent, fair, transparent and objective standard for assessing education requirements. Any lowering of the academic standards for entry to practice may also undermine the public’s confidence in the regulation of the architectural profession.

Academic Qualifications: Limited Licence

Academic qualifications form a foundational component of the pathway for individuals seeking a limited licence as a Licensed Technologist. This class of limited licence enables qualified individuals to practise architecture within a defined, limited scope of work that reflects their academic training and experience. The academic requirement ensures applicants possess the necessary body of knowledge to perform architectural services safely and competently within that scope.

The OAA recognizes specific programs, such as an Ontario College Advanced Diploma in Architectural Technology, as providing the technical knowledge, applied theory, and fundamentals required for limited practice. Colleges offering the three-year Advanced Diploma in Architectural Technology in Ontario are responsible for ensuring their programs fully comply with the requirements set out in the *Ontario College Program Standard: Architectural Technology (MTCU Code 60600)*, published by the Ministry of Colleges and Universities. This document outlines the mandatory learning outcomes, essential skills, and general education components that must be integrated into the curriculum. Colleges must ensure that students develop core competencies such as technical drafting, building science, code compliance, project documentation, and sustainable design practices.

Requiring a recognized academic qualification ensures consistency, credibility, and public trust in the limited licence class. Academic qualifications serve both as a quality assurance mechanism and a baseline indicator of readiness, complementing the practical experience and competency verification components of limited licence.

Although academic qualifications are essential to ensuring applicants for a limited licence possess the foundational knowledge for competent and safe practice, there may be cases where Council could consider an exemption from this



requirement. Such exemptions must be evidence-based, and consistent with the OAA's mandate to protect the public interest while ensuring fairness and transparency in registration practices.

Council may consider an exemption where the applicant can demonstrate that they possess equivalent academic knowledge gained through alternative educational pathways. For instance, an individual who holds alternative credentials in architectural technology may be able to present a compelling case they meet the academic expectations associated with the limited licence scope.

Importantly, the onus lies with the applicant to provide clear, verifiable documentation that their education satisfies the intent and learning outcomes of the prescribed academic requirement. Any exemption must preserve the integrity of the limited licence class and uphold public protection by ensuring the applicant is fully competent to practise within the authorized scope of the limited licence.

Examination

All licence applicants must complete the current [Examination for Architects in Canada \(ExAC\)](#) or the [Architect Registration Examination](#) administered by National Council of Architectural Registration Board, or demonstrate to the satisfaction of Council that there are circumstances making this impossible, unreasonable, or unnecessary. Further, applicants for exemption must demonstrate, to the satisfaction of Council, that their qualifications, knowledge, and experience merit an exemption from the examination requirement.

The ExAC is an examination for admission that is recognized by all the professional bodies that oversee the architectural profession in the Canadian provinces and territories. Successful completion of the ExAC is one of the requirements that ensure the competence of architects.

The licensing examinations prescribed in the regulations at Section 31(4) are designed to assess whether a given candidate for licensure demonstrates the minimum level of competence required of an entry-level Architect, ensuring both public safety and the professional and skilled delivery of architectural services. A competency is defined as a "knowledge, skill, ability, attitude, or judgment required for entry-level practice." The licensing examinations focus on those competencies that have the most direct impact on the protection of the public and on effective and ethical practice.

The priority of the Regulatory Organizations of Architecture in Canada was to create an examination, in English and French, that meets international standards for the development, administration, scoring, and reporting of licensing examinations. Development and validation teams of architects from ROAC, guided by the test consultants, developed the [ExAC General and Specific Objectives](#) as well as the table of specifications, and wrote the items following strict metrological properties. ROAC's goals include the optimization of the quality and fairness of every aspect of the ExAC. The Committee for the ExAC, with a mandate to oversee the management of the examination, is composed of representatives from the profession from all regions of Canada who are members of the ExAC Agreement Protocol.

To be eligible to register for the ExAC, an applicant must hold Intern Architect status with one of the Regulatory Organizations of Architecture in Canada and must have recorded 2800 hours of approved experience in the Canadian Experience Record Book (CERB). The ExAC is delivered once each year simultaneously across Canada, organized into four sections, and delivered in four one-half day sessions over a period of two consecutive days.

All limited licence applicants must complete the current OAA Technology Program (OTP) Licensed Technologist examination or demonstrate to the satisfaction of Council that there are circumstances making this impossible, unreasonable, or unnecessary. Further, applicants for exemption must demonstrate, to the satisfaction of Council, that their qualifications, knowledge, and experience merit an exemption from the examination requirement.

The licensing examinations mark an essential component of the entry-to-practice requirements. Given the complexity and rigour of its development, any request to exempt of this requirement ought to be examined through the lens of the public interest.



Experience

Professional licensure serves to protect the public by ensuring that only qualified individuals are authorized to practise in regulated professions. In architecture, as in many other professions, academic training provides essential theoretical knowledge, but it is through structured, hands-on experience that applicants develop and demonstrate the practical competencies required to practice safely, ethically, and effectively in real-world contexts.

The Internship in Architecture Program (IAP) is a national framework adopted across Canadian jurisdictions to guide licence candidates through a structured period of work experience under the supervision of licensed professionals. It is grounded in the aforementioned *Canadian Standard of Competency for Architects*, which articulates a series of outcomes and performance indicators that reflect the multifaceted demands of contemporary architectural practice—including, but not limited to, design development, construction documentation, project management, regulatory compliance, and ethical conduct.

Similarly, the OAA Technology Program framework guides limited licence candidates through a structured period of work experience under the supervision of licensed professionals.

This type of competency-based experience ensures candidates have had direct exposure to the complex responsibilities of the profession, and that their skills have been observed, validated, and assessed by those qualified to evaluate readiness for independent practice. It also fosters critical habits of mind—such as professional judgment, client communication, interdisciplinary collaboration, and accountability—that cannot be developed through academic education alone.

In architecture, supervised work experience ensures a public-interest safeguard, bridging the gap between theoretical training and the capacity to perform competently without supervision. It also reinforces a practitioner's understanding of relevant laws, codes, contracts, professional standards, and performance expectations—all of which may differ significantly between jurisdictions.

While hands-on experience is a cornerstone of safe and competent professional practice, Council may consider exemptions from prescribed experience requirements. Such decisions must be firmly grounded in the public interest, consistent with the regulator's legislative mandate.

An exemption may be considered where the applicant can provide clear, documented evidence that they have acquired equivalent competencies through alternate means. This could include substantial supervised experience gained in a comparable jurisdiction, independent practice as a licensed professional elsewhere, or other forms of practical experience that meet the intent of the prescribed requirements. Exemptions may also be considered where the individual demonstrably possesses the necessary competencies and where participation in the prescribed program is not feasible.

In all cases, the onus rests with the applicant to demonstrate they have met the intent of the prescribed experience requirements. Exemptions must not compromise public protection or dilute the standard of practice, but rather provide an opportunity for those who can substantiate their readiness to practise competently and independently.

Council relies on the recommendation of the Experience Requirements Committee (ERC) to assess experience-based exemption requests because the ERC has the expertise and established tools to evaluate the quality, scope, and sufficiency of architectural experience as required by the regulations. The ERC uses a standardized evaluation template, rigorous interview procedures, and trained assessors to ensure consistent, fair, and defensible evaluations of experience across all applicants. This reliance ensures Council's decisions are grounded in an objective, competency-based review process and prevents unnecessary duplication of efforts. It also reinforces the integrity of the regulatory framework by ensuring experience exemptions are vetted by those best positioned to assess them.

OAA Admission Course

The online OAA Admission Course is a mandatory requirement for licensure in Ontario. Offered three times a year, it covers topics related to regulatory matters, legal issues, and information specific to the practice of architecture in Ontario.



The Admission Course is not intended to be an exam preparatory course. It is a foundational piece created as a practical tool that supplements an applicant's work experience.

The modules of the Course include the following:

- Professional Responsibility, Ethics, and Membership in a Self-Regulating Profession;
- *Construction Act*;
- Legal Aspects: Professional Liability and Architects' Contracts;
- Planning and Development Approvals;
- The *Building Code Act* and the Building Permit Application Process;
- Ontario Building Code Compliance Data: Concepts and Code Analysis;
- Bid Theory and Bid Practice; and
- Contract Administration and General Review.

When reviewing a request for exemption from the OAA Admission Course, Council must consider whether the applicant has demonstrated they have acquired knowledge and understanding equivalent to the content and objectives of the course. This includes familiarity with Ontario-specific legislation, regulations, professional conduct requirements, construction standards, and the ethical and practical responsibilities of licence and limited licence holders in the province.

Council should assess whether the alternative education or experience presented by the applicant addresses the public interest purpose of the Admission Course; namely, to ensure that all applicants, regardless of their prior training or jurisdiction of origin, are equipped to practise safely, ethically, and competently within the Ontario context. Given the course's accessibility - including regular online offerings and reasonable costs - exemptions should only be considered in cases where clear, compelling evidence shows that the course's intended learning outcomes have already been met through substantially equivalent means.

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- 13. (1)** *The Registrar shall issue a licence to a natural person who applies therefor in accordance with the regulations and,*
- a) *is of good character;*
 - b) *is not less than eighteen years of age;*
 - c) *is a citizen of Canada or has the status of a permanent resident of Canada or is a member of an organization of architects that is recognized by the Council and that has objects, standards of practice and requirements for membership similar to those of the Association;*
 - d) *has complied with the academic and experience requirements specified in the regulations for the issuance of the licence subject to any exemption by the Council; and*
 - e) *has passed such examinations and completed such courses of study as the Council may set or approve in accordance with the regulations subject to any exemption by the Council.*

- ² **13.1 (1)** *The Registrar shall issue a limited licence to a natural person who applies in accordance with the regulations and,*
- a) *is of good character;*
 - b) *is not less than 18 years of age;*
 - c) *is a citizen of Canada or has the status of a permanent resident of Canada or is a member of an organization of architects that is recognized by the Council and that has objects, standards of practice and requirements for membership similar to those of the Association;*
 - d) *has complied with the academic and experience requirements specified in the regulations for the issuance of a limited licence, subject to any exemption by the Council; and*
 - e) *has passed such examinations and completed such courses of study as the Council may set or approve in accordance with the regulations, subject to any exemption by the Council.*

³ **31.** *The following academic, experience and examination requirements for the issuance of a licence to a person are prescribed for the purposes of clauses 13 (1) (d) and (e) of the Act:*

1. *The person must hold a degree in architecture from a post-secondary institution or must have successfully completed the*



Royal Architectural Institute of Canada Syllabus.

2. *The person must hold a Certificate of Certification issued by the Canadian Architectural Certification Board.*
3. *The person must have completed the admission course offered by the Association.*
4. *The person must have successfully completed one of the following:*
 - i. *The Examination for Architects in Canada published by the Association.*
 - ii. *The Architect Registration Examination of the National Council of Architectural Registration Boards.*
 - iii. *Any combination of the components of the Examination for Architects in Canada published by the Association and of the Architect Registration Examination of the National Council of Architectural Registration Boards that, considered as a whole, is equivalent to one of those examinations, as approved by the Council.*
5. *The person must have completed a total of 3,720 hours of experience, under the personal supervision and direction of a person authorized to practice architecture in the jurisdiction in which the experience is obtained, that meets the requirements of the Internship in Architecture Program published by the Association. At least 940 hours of the experience must have been completed within the three years before the date on which the person applies for the licence.*
6. *If fewer than 940 of the total hours of experience required by paragraph 5 were completed in Canada, the person must have successfully completed the Council approved courses specified in the Internship in Architecture Program published by the Association.*
7. *The person must have completed an experience assessment provided by the Association.*

⁴ 32. (1) *The following academic, experience and examination requirements for the issuance of a limited licence to a person are prescribed for the purposes of clauses 13.1 (1) (d) and (e) of the Act:*

1. *The person must hold an advanced diploma from an Ontario college of applied arts and technology for a three-year architectural technology program or have graduated from a three-year college architectural technology program accredited by Technology Accreditation Canada.*
2. *The person must have completed the admission course offered by the Association.*
3. *The person must have successfully completed the Examination for Licensed Technologists published by the Association.*
4. *The person must have completed a total of 5,580 hours of experience, under the personal supervision and direction of a person authorized to practice architecture in the jurisdiction in which the experience is obtained, that meets the requirements of the OAA Technology Program published by the Association. At least 940 hours of the experience must have been completed within the three years before the date on which the person applies for the limited licence.*
5. *If fewer than 940 of the total hours of experience required by paragraph 4 were completed in Canada, the person must have successfully completed the Council-approved courses specified in the OAA Technology Program published by the Association.*
6. *The person must have completed an experience assessment provided by the Association.*

(2) Paragraphs 1, 4 and 5 of subsection (1) do not apply with respect to a person who successfully completed the Advanced Standing Program that was administered by the Ontario Association of Applied Architectural Sciences before its dissolution.

