

Entry-to-Practice Review

Executive Summary

The mission of the Certified General Accountants of Ontario (CGA Ontario) is to ensure its members merit the confidence and trust of all who rely upon their professional knowledge, skills, judgment and integrity, while advocating the use of their professional expertise in the public interest. The entry-to-practice review exercise complemented the Association's continuous improvement strategies and provided an additional level of understanding and awareness of the perspectives of members, students and applicants to the CGA program of professional studies.

Information for the review was gathered through a series of interviews, discussions and meetings with various departments and staff. To gain perspective from current students and new members, telephone interviews were conducted. Data from past surveys of students and CGAs were also leveraged.

Overall, the review allowed CGA Ontario to gain confidence in the relevance and necessity of its entry-to-practice requirements. At the same time, the review uncovered areas where further flexibility can be explored and helped identify registration practices where increased transparency can be achieved.

Implementation of the recommendations formed through this review will be largely done by the student services department. CGA Ontario will continue to gather information on the review topics through its biennial student services survey.

Objectives and Scope

In response to the Ontario Fairness Commissioner's request, CGA Ontario conducted a mandatory entry-to-practice review. CGA Ontario welcomed this opportunity to re-examine the relevance and necessity of its entry-to-practice requirements and appraise the transparency, objectivity, impartiality and fairness within its registration practices. The review exercise continued upon the knowledge and outcomes gained through completion of the fair registration practices and audit reports.

The scope of the review was framed by three areas of evaluation, as identified by the Ontario Fairness Commissioner:

1. The necessity and relevance of the requirements for practical work experience.
2. The efficiency and timeliness of decision-making, including decisions related to assessment, registration and appeals.

3. The reasonableness of fees charged in respect of registrations, including fees charged by third-party assessment agencies.

The objective of the review was to examine the two levels of entry for becoming a certified general accountant - entry to the CGA program of professional studies as a student and entry to membership as a certified general accountant. In-depth analysis was conducted on the necessity and relevance of the work experience requirement, while summary analysis was performed on the efficiency and timeliness of decision-making and reasonableness of fees.

The questions asked through the review were:

A. Requirements for Practical Work Experience

- How does the work experience requirement relate to competent and safe practice of the profession to ensure public safety? How well does it predict competence?
- How did the work experience requirement emerge? Is there relevance to its existence?
- To what extent is international experience sufficient to meet the objectives of the workplace requirement? To what extent is Canadian or Ontario experience necessary to become familiar with the specifics of practice in Ontario?
- Are the length of time, conditions, location and nature of the work experience requirement relevant to ensure competent practice?
- Are there barriers that may unfairly restrict access to workplace positions?
- Is the work experience requirement clear and easy to understand?

B. Efficiency and Timeliness of Decision-Making

- What formal policies and procedures are in place for communicating decisions, responses and reasons to applicants?
- Are applicants notified of gaps before a decision is made so that they have a chance to upgrade their qualifications or provide further documentation?
- What monitoring is done to ensure procedures are followed and time standards are met? How quickly are assessment decisions, registration decisions, internal review decisions and appeal decisions completed and communicated? Are reasons given?
- What parts of the registration process could be streamlined? Could certain timelines be reduced?

C. Reasonableness of Fees

- How are CGA Ontario's fees set? What is the rationale for the amounts, and is there an objective basis for the amounts? Are fees higher than the costs of providing services? Are fees higher than those charged by similar regulatory bodies?
- Do fees discourage potentially qualified applicants or create hardship for those who apply? Who contributes toward the direct program expenses for students? In what circumstances can fees be waived or paid in instalments?

- Are there measures to ensure that fees charged by qualifications assessors are reasonable?

Methodology

CGA Ontario's entry-to-practice review was conducted by its student services department. Guidance on project planning and implementation was provided by an advisory committee comprised of the vice-president, student services; vice-president, member services and regulatory affairs; and vice-president, government and corporate affairs. Project implementation was conducted by the business manager, student services with assistance from the coordinator, student advisement, from December 2010 to February 2011. Conducting the review during this period allowed staff to reflect on their impressions and recent experiences from the academic year's fall and winter enrolment periods and CGA Ontario's annual November admission to membership ceremony.

For the purposes of gathering qualitative data, several meetings and discussions were conducted with various groups and individuals. Information and feedback were sourced from the following:

- Three business development representatives, who shared their experience from working with settlement groups, cultural organizations, and employers; and provided insight to how the work experience requirement is perceived by prospective students, international applicants, and industry employers.
- Two business development representatives, who relayed the experiences of applicants who undergo the transfer credit assessment process.
- Eight admissions and registration staff in the student services department, who shared their experiences with processing applications, conducting assessments, answering inquiries and providing advisement.
- Two academic credentials coordinators, who described their process for assessing transfer credits and degrees.
- Three student services staff involved in the internal review process and academic credentials review panel, who proposed suggestions on how to improve the process for receiving requests for additional transfer credits.
- A member of the registrar staff, who contributed information on the entry to membership application process.
- The vice president, finance, who explained the processes for reviewing and setting fees.
- A manager of a third party service provider, who provided details on their academic credentials assessment services, customer service strategies, appeals option and processes for quality management and document control.
- CGA Canada's national practical experience committee, who supplied clarification on the practical work experience requirement's framework and rationale.
- Five new CGAs and five new students in the CGA program of professional studies, who responded to an invitation to participate in a 30 minute telephone survey.

Participants in the telephone survey responded to a call-out for volunteers to take part in a 30 minute student experiences interview. They contributed their time without compensation. The invitation was issued to new members, who had recently celebrated their certification at CGA

Ontario's annual admission to membership ceremony in November 2010. It was also sent to new students, who had recently enrolled in the CGA program of professional studies for the 2010-11 academic year. Half of these survey participants had entered the CGA program with education completed outside of Canada.

Past student services surveys provided quantitative data which was utilized to complete the review. CGA Ontario commissions surveys regularly to gather feedback on its program services and policies from CGAs, current students and lapsed students who discontinued studies in the CGA program. Information from student surveys completed for academic years between 2000 and 2008 was assessed. These surveys were conducted by telephone, with the exception of the most recent survey during academic year 2008-09, which was done online. Participation volumes for these past student surveys were as follows:

- 2000: 250 current students and 50 lapsed students
- 2003: 250 current students and 50 lapsed students
- 2006: 250 current students and 50 lapsed students
- 2008: 635 current students and 69 lapsed students

Findings from a spring 2010 member survey, which received responses from approximately 3,000 individuals, were also reviewed.

Documents that were referenced during the review included CGA Ontario's 2010-11 Student Handbook, website, bylaws, and code of ethical principles and rules of conduct. In addition, template letters and application forms were collected to review wording and content. External documents included CGA Canada's Competency Framework and 2010-11 Syllabus and the International Federation of Accountants (IFAC)'s international education practice statements and guidelines.

Results of the Review - Work Experience

Part One: Questions, Analysis and Findings

1. How does the work experience requirement relate to competent and safe practice of the profession to ensure public safety? How well does it predict competence?

The CGA program is designed to allow part-time study while pursuing employment and career advancement. Gaining work experience during studies is relevant to the success of a student's learning in the CGA program. Students are encouraged to gain employment that is progressive with their level of studies, so that education and experience are integrated and complement the student's development. Work experience encourages students to take opportunities to apply the knowledge gained through courses to actual, real-world business activities. It allows students to exercise professional judgment, problem analysis and problem-solving skills. Practical work experience also fosters understanding of organizations and business functions.

The work experience requirement is necessary to assess a student's ability to competently apply the knowledge gained through education and to demonstrate professional level knowledge, skills, values, ethics and attitudes. Practical experience enables students to gain an understanding of the

business environment and relate the practice of accounting to other business functions and activities.

Verifying a student's experience, skill level and competence is relevant to the Association's responsibility of protecting the interests of the general public and employers and its commitment to providing knowledgeable, skilled and ethical professional accountants. Students are assessed on their breadth and depth of experience in applying professional technical knowledge, general management, leadership and professionalism. Students are also assessed on their demonstration of core competencies, which include communications and business relations skills, management of confidentiality and ethical standards and professional judgment. Development of these skill areas provides confidence that students who are admitted to membership will be equipped to maintain their professional competence and further progress through participation in professional development activities.

2. How did the work experience requirement emerge? Is there a relevance to its existence?

The work experience requirement of the CGA program is framed by guidance issued by the International Federation of Accountants (IFAC), the international accounting standards-setting organization of which CGA Canada is a full and active partner. IFAC's International Accounting Education Standards Board develops generally accepted good practices in educating and developing professional accountants, including standards for setting the practical experience requirements for candidates' initial professional development and for qualification as a professional accountant. IFAC requires its member bodies to ensure the acceptability of the practical experience candidates have gained before admission to membership.

The practical work experience requirement is implemented and reviewed at a national level with the participation of CGA Canada's provincial affiliates, including CGA Ontario. Guidelines and standards are set through the national education committee, with participation and input from the national practical experience committee. The national practical experience committee meets regularly to discuss suggestions, observations and feedback to initiate recommendations for updates to policy, guidelines and practices.

The competencies assessed through the work experience requirement are selected to reflect CGA Canada's competency framework. Every three to five years, CGA Canada updates its competency framework through a practice analysis. The update ensures that the initial, pre-certification competencies required of students in the CGA program are relevant and reflect the current and future skills required of professional accountants in the marketplace.

Practical work experience is a relevant and important part of developing and demonstrating competence as a professional accountant. It provides students with opportunities to observe and engage in real-life situations which require them to recognize ethical dilemmas, exercise professional judgment and be accountable for their decisions and actions.

Survey results reveal that students and CGAs feel that practical experience provides important practice and training on how to perform what was learned through education. Work experience was recognized as part of one's development toward being a professional. The most common importance

noted was the value of developing skills in managing people, relationships and teamwork, as well as developing flexibility, strategy and planning skills.

3. To what extent is international experience sufficient to meet the objectives of the workplace requirement? To what extent is Canadian or Ontario experience necessary for applicants to become familiar with the specifics of practice in Ontario?

International experience can count towards a maximum of two-thirds of the work experience requirement. Students in the CGA program are required to achieve a minimum of three years of work experience, including a minimum of one year in Canada performing in a role with senior/professional level responsibilities. The period of Canadian experience can be in any province.

The requirement for students to gain Canadian work experience is consistent with IFAC's recommendation that candidates for membership gain practical experience concurrently or after completion of their education. IFAC's international education standards require that the content of professional accounting education programs include knowledge of the business legal environment, including securities and companies laws, appropriate for the role of the profession in a particular country. Canadian work experience is relevant to the requirement that students apply this knowledge and provide current demonstrations and verification of these competencies while completing the CGA program of professional studies.

4. Are the length of time, conditions, location and nature of the work experience requirement relevant to ensure competent practice?

The requirement for a minimum period of three years of work experience is relevant to the assessment of a student's development, integration and accumulation of competencies toward a professional level of responsibility and competency. A student's report of work history over a minimum period of three years allows for the evaluation of his or her path of progression. In addition, it allows for assessment of the student's method of advancement from foundation and intermediate level responsibilities to the achievement of professional level roles. Three years of practical application is necessary to ensure that students in the CGA program, at a time before entrance to practice, have acquired a comprehensive base of experience, with sufficient breadth and depth, upon which they can continue to grow through professional development.

The requirement for a minimum of one year of professional level experience in Canada is relevant to the registration practice of requiring applicants to have citizenship, landed immigrant status or a valid study visa for enrolment in the CGA program. Students are encouraged to seek work experience at a level that is commensurate with their level of studies in the CGA program. Requiring verification of a student's current level of professional and technical skills is necessary to ensure that there has been maintenance and current demonstration of professional level competence at the time before entry to practice.

The requirement for students to seek attestation by a professional accountant of their practical experience and professional competence is necessary for verification and feedback on the

information reported by the student. This requirement is also relevant to the encouragement of students and employers to develop a mentoring relationship, as recommended through IFAC's guidance. Requiring that the student's attester is a professional designated accountant ensures that the individual possesses a current understanding of member body admission processes, issues facing the profession and the current level of knowledge and skills required in the profession. In addition, this requirement provides confidence that the individual is duly performing the verification and attestation duties within the scope of his or her technical abilities and ethical obligations of the profession.

5. Are there barriers that may unfairly restrict access to workplace positions?

A review of student survey feedback shows that students do not experience significant barriers against achieving relevant employment. Over past survey years, the average proportion of respondents who reported they were currently working in accounting related positions was 90 per cent. In addition, a review of feedback from students who did not complete the CGA program indicates that finding employment was not a common reason for withdrawing. When current students in the CGA program were asked what further assistance they would like to see from CGA Ontario, results over survey years show that only 4 per cent of respondents suggested providing help with finding employment.

Data suggests students with international backgrounds do not face additional barriers in securing employment positions that facilitate meeting the work experience requirement. An analysis of students who have completed the education and exam portions of the CGA program, and have only to satisfy the work experience requirement, shows that the number of students with international education backgrounds is proportionate.

Feedback from program representatives, who develop partners-in-employment and employment referral services for CGAs and students in the CGA program, reveal that employers generally accept their role and involvement in providing guidance and verification of students' work experience and competencies. Survey feedback from CGAs included examples of how their employers facilitated their acquisition of relevant experience to demonstrate competence.

6. Is the work experience requirement clear and easy to understand?

CGA Ontario business development representatives, who support and work closely with settlement groups and who conduct orientations to prospective students, suggest that international applicants may have difficulty relating to the language and terminology used in program information about the work experience requirement.

Survey data suggests that students with international education or with English as a second language more often submit work experience for interim assessment than students with domestic education. New students in the CGA program tended to have only a general awareness of the work experience requirement; they had not reviewed the information provided to them upon enrolment. The information included advisement on the online experience reporting requirements, procedures for assessment and encouragement to involve their employer in their planning towards achievement

of the professional level competencies. Students who had reviewed the information suggested that the amount of content was substantial and difficult to summarize in order to do a self assessment.

Surveyed members were satisfied in general with their experience in the assessment process. Some suggestions to improve clarity included providing more examples of positions that would satisfy the requirement and providing a more objective definition of what is considered a professional level of experience. The lack of examples reduced their confidence in drawing comparisons between their individual experience and the required standard in order to identify variances and develop strategies to achieve the requirement.

Part Two: Recommendation

Provide additional transparency to the requirement for one year's experience at a senior/professional level. As students in the CGA program have the flexibility of gaining work experience in a variety of positions and industries, and each student develops his or her own unique portfolio of experiences and achievements, using an objective definition of what constitutes senior/professional work experience would be limiting to the student. However, providing examples of job responsibilities, positions, and career maps would provide frames of reference and assist students in better understanding the concept and planning towards the requirement.

Part Three: Implementation Plan

- Action Item:
 - Provide additional transparency to the requirement for one year's experience at a senior/professional level.

- Delivery Timeline and Individuals Responsible:
 - Review what CGA Ontario's provincial affiliates are doing to learn what employment examples and career maps they provide to their students (coordinator, student advisement, April 30, 2011).
 - Revisit the language used for information on the work experience requirement on CGA Ontario's website and find opportunities to simplify language (coordinator, student advisement, May 31, 2011).
 - Request the national practical experience committee collaborate on the development of a standard set of employment examples and career maps that meet the requirement of achieving professional/senior level experience (student services business manager, May 31, 2011).
 - Solicit input and ideas from CGA Ontario program representatives, who connect regularly with employers and settlement groups (student services business manager, June 30, 2011).
 - Expand the number of experience examples that students can reference during completion of the national online work experience report (national practical experience committee, July 31, 2011).

- Develop examples and career maps with input from CGA Ontario's student experience review committee (coordinator, student advisement, July 31, 2011).
 - Review all draft examples and career maps with the national practical experience review committee to receive feedback and suggestions (student services business manager, August 31, 2011).
 - Finalize the set of examples and career maps that will be posted for purposes of student advisement (student services business manager, October 31, 2011).
 - Update CGA Ontario's website to make the reference material available to prospective and current students (coordinator, student advisement, November 30, 2011)
- Implementation Challenges and Strategies:
 - The selection of examples and career maps should include a variety of career paths and be representative of the variety of educational backgrounds in CGA Ontario's student population. Feedback from CGA Ontario's business development representatives and student advisers can be used to ensure that career maps are reflective of current industry trends and students' frequently asked questions.

Results of the Review - Fairness of Process Timelines to Applicants

Part One: Questions, Analysis and Findings

1. What formal policies and procedures are in place for communicating decisions, responses and reasons to applicants?

For application for transfer credits submissions, CGA Ontario's registration practice is to process applications within five business days of receiving all required documents. Advisement of this practice is posted on CGA Ontario's website and on the application for transfer credit form. If expected documents are still outstanding after 20, 40 and 60 business days, applicants are notified by email. Upon receipt of all expected documents, CGA Ontario sends an email notification to the applicants to advise them that their documentation is complete, their application is being forwarded for processing, and that results should be communicated within approximately five business days.

Applicants are informed of their transfer credit assessment results by email, supplemented by a hardcopy report that is mailed. The results include reasons why credits were not granted. For assessment results of degree qualifications, the report indicates whether a third party service provider was used to evaluate degree equivalency or whether the determination was made by CGA Ontario. The transfer credit report also restates information posted on CGA Ontario's website regarding general policies for transfer credits. This includes the expiry policy for courses in tax, auditing and management of information systems, which are ineligible for exemptions if they were taken prior to a specific timeframe.

The email notification of transfer credit assessment results allows applicants to access their evaluation report online. The report includes a convenient link to an online form for application for enrolment. If applicants require further clarification of their results, they are able to contact CGA Ontario by phone to speak to a client service adviser. They may also email the admissions and registrations department directly at an address dedicated to transfer credit inquiries.

To provide opportunity for applicants to ask questions or seek further clarification about transfer credit assessment results before their enrolment in the CGA program of professional studies, CGA Ontario contacts and follows up with applicants during a period of up to 20 days after the completion of assessment. In addition, email communications are sent prior to each CGA program enrolment deadline to remind individuals of the next enrolment due date and to encourage use of the online enrolment option.

Applications for entry to the CGA program can be submitted online or by a hardcopy enrolment form. Online applicants who complete all declarations favourably and submit registration fees are processed at once, with confirmations of enrolment provided online. Hardcopy enrolment application submissions are processed within 15 business days after receipt of all required documents. This policy is stated on the application for enrolment form.

Work experience report submissions are assessed and processed within two to four weeks of receiving all required information. Assessment results are sent by letter. The letter includes an assessment of the student's current level of experience and, when applicable, recommendations to the student for continued development towards meeting the work experience requirement.

Students who have successfully completed the CGA program of professional studies are forwarded applications for entry to membership. The application must be completed and submitted by specified deadlines, which are aligned to the Association's board of directors meeting schedule. The Student Handbook and CGA Ontario website list the deadlines to submit applications for membership and the six membership intake periods during the academic year. Applications for admission to membership are submitted to the member registrar. Acceptance into membership confirmations are mailed to applicants approximately three weeks after each application deadline.

Feedback in student surveys indicates that there are no significant concerns about the timeliness of processing applications for transfer credits, enrolment and/or membership. Current students with international education and English as a second language gave the same level of positive feedback on the transfer credit assessment process as students with domestic education and English as a first language. From both groups, positive ratings were given by over 80 per cent of respondents. When asked which policy was most helpful to them, the transfer credit policy was most favourable, representing 92 per cent of responses.

A review of transfer credit assessment information posted on CGA Ontario's website reveals that the minimum grade criteria to qualify a past course for exemption towards a course in the CGA program is not identified in the general transfer credit policy information posted.

A review of the entry to practice requirements reveals that, while advisement regarding admission requirements and process for entry to the CGA program is detailed, information about the application process for entry to membership is less transparent to students. Although this information is

available within the Association's bylaws, posted on CGA Ontario's website, students are not guided to reference the document.

2. Are applicants notified of gaps before a decision is made so that they have a chance to upgrade their qualifications or provide further documentation?

During the assessment for transfer credits, there is an intermediary process in place to advise applicants if additional information is required to complete the assessment. A letter is sent informing the individual of the supplementary information needed. If the additional documentation is not crucial for the initial transfer credit assessment, the assessment report is completed and a note is put in the comment section advising that additional transfer credits may be considered if supplemental educational documents are provided.

If an application for transfer credits, program enrolment or admission to membership includes a declaration of past offences or sanctioning by another regulatory body, the applicant is contacted and given the opportunity to provide further information and documentation. After review of this information, a decision on the application is made by the admissions and registration manager or member registrar. This registration practice is relevant to the requirement that students and members display good character and abide by the standards of conduct prescribed in the Association's code of ethical principles and rules of conduct. The code of conduct is relevant to the Association's commitment to protecting public interests.

If a student submits a work experience report with incomplete information, he or she is advised and given an opportunity to correct the information and have their updated report verified. If an assessor has questions about the information claimed in a work experience report, the student or employer is contacted to clarify details before a decision is made.

3. What monitoring is done to ensure procedures are followed and time standards are met?

Upon receipt of an individual's initial application for transfer credits, a unique identification number is assigned to the applicant. An online application is used to track the receipt and aging of transfer credit applications, identify pending or delayed files, and to add notations on circumstances and reasons affecting a file's processing. In addition, application forms and related documents are date stamped, electronically tracked and initialled by administrators through the assessment process to ensure that procedures are followed. Monitoring and reporting on the timeliness of processing applications and assessments within published timelines is performed. Metrics are analyzed to support efforts in continuous process and service improvement.

Work experience reports are also tracked to monitor the receipt and aging of submissions and record when results have been mailed to a student. Assessments are signed and dated by staff and work experience assessors.

A memorandum of understanding is being developed between CGA Ontario and a third party assessment agency which provides evaluation of degrees. The memorandum will include sections stating the service provider's quality procedures and customer service levels.

4. How quickly are assessment decisions, registration decisions, internal review decisions and appeal decisions completed and communicated? Are reasons given?

Results of a transfer credit assessment are normally completed and communicated to applicants in approximately five business days after receiving all required information and expected documents. The report includes additional explanation of why some exemptions were not granted.

Applications for program enrolment are processed immediately when submitted online. Hardcopy applications are processed within 15 days of receiving all required information and expected documents. Any letter of denied program entry includes reasons for the decision and advisement of the option to appeal. Appeals for entry to the CGA program are decided within 20 business days after receiving the appeal.

When an applicant submits a request for an internal review to the academic credentials review panel, in order to receive additional transfer credits, a result letter is sent approximately eight weeks after receiving the request. The letter includes which additional exemptions were approved and the reasons why some credits were denied.

If an application for membership and the applicable dues are received by the published deadlines, approval of the application by the board of directors is confirmed within one month of receiving the form. If a completed application is received after a deadline, it is processed for the next scheduled board meeting. The schedule of deadlines is published in the Student Handbook and on the student section of CGA Ontario's website.

If the applicant identifies on the form that he or she has been found guilty of an offence and/or sanctioned by another regulatory body, the member registrar may refer the application to the disciplinary committee or admissions standards committee to determine if the applicant meets the requirement of good character. This additional procedure may delay the decision on the application. Any denied application for admission to membership would include a letter including reasons for the denial. Details of this process are available in the Association bylaws, which are posted on CGA Ontario's website.

A review of the Student Handbook revealed that there is no advisement regarding the Association bylaws which apply to students during the application for membership process. As well, a search on CGA Ontario's website did not find information for prospective students about the option to appeal for entry to the program.

5. What parts of the registration process could be streamlined? Could certain timelines be reduced?

An applicant's process for sending requests for additional transfer credits through an internal review can be streamlined by providing clearer information to applicants on what should be reviewed from the original transfer credit assessment, what additional information can be considered and what the internal review panel can make decisions on. Standardizing the process for submitting requests would assist students in selecting and submitting relevant information, to ensure the panel understands the request and reasons, and reduce the processing time.

Part Two: Recommendations

1. Provide additional transparency to applicants of the objective mark criteria used for granting transfer credits and resources used by CGA Ontario for assessing equivalency of international degrees. Although the minimum mark is identified within separate transfer credit policies with various domestic institutions, there is no advisement within general transfer credit policy information on the required minimum mark or general criteria used during assessments. Details of these registration practices can be added to the CGA Ontario website and on the transfer credit report. This information guides applicants to better recognize whether they have additional information that is relevant for an internal review and make decisions on their next steps towards enrolment in the CGA program.
2. Expand the substantive fairness in conducting internal reviews by removing the requirement that an applicant must submit a letter to the academic credential review panel to request a review for additional transfer credits. A standardized application form can be used in lieu of a letter. The form would provide a checklist of what criteria can be considered and include required fields for additional information.
3. Provide additional transparency to students and finalists on the application process for admission to membership. Information and reference to the applicable bylaws can be added to the Student Handbook and CGA Ontario's website.
4. Provide additional transparency to applicants on the opportunity to appeal for entry to the program. Currently, an applicant is advised by letter of the appeal option when his or her application is denied. Information on the appeal option can be added to CGA Ontario's website for prospective students.

Part Three: Implementation Plan

1. Provide additional transparency to students in the CGA program of the criteria and resources used for granting transfer credits.
 - Action Items, Delivery Timeline and Individual Responsible:
 - Review details of CGA Canada's national transfer credit committee policies to ensure they align with CGA Ontario's assessment practices, and identify key messaging that can be related to applicants (manager, admissions and registration, April 30, 2011).
 - Develop messaging and add details to CGA Ontario's website, in the section related to transfer credits and internationally educated professionals (academic credentials coordinator, May 31, 2011).
 - Add standard messaging to repeat details in applicant's electronic and hard copy transfer credit assessment report (manager, admissions and registration, June 30, 2011).
 - Implementation Challenges and Strategies:

- The manager of admissions and registration will need to assess the current advisement information printed with transfer credit reports and determine what revisions can be made to simplify instructions and minimize content, with a focus on frequently asked questions. The marketing and communications department can assist with editing.
2. Expand the substantive fairness in conducting internal reviews by removing the requirement that an applicant must submit a letter to the academic credential review panel to request a review for additional transfer credits. Provide applicants with a standard request form.
- Action Items, Delivery Timeline and Individual Responsible:
 - Prepare a draft version of the request form (coordinator, student advisement, March 31, 2011).
 - Review and finalize the form with any additional revisions or additions (academic credentials review panel, April 30, 2011).
 - Post the form, information and instructions on CGA Ontario's website (academic credentials coordinator, June 30, 2011).
 - Include details about the form in the 2011-12 Student Handbook and transfer credit assessment reports (manager, admissions and registration, June 30, 2011).
 - Implementation Challenges and Strategies:
 - The manager of admissions and registration will need to assess the current advisement information printed with transfer credit reports and determine what revisions can be made to minimize content and simplify instructions, with a focus on frequently asked questions. The marketing and communications department can assist with editing.
3. Provide additional transparency to students in the CGA program and finalists on the application process for admission to membership.
- Action Items, Delivery Timeline, and Individual Responsible:
 - Create a new web page within the student section of the CGA Ontario website providing advisement on the application for membership process (coordinator, student advisement and manager, admissions and registration, May 31, 2011).
 - Add advisement on the process to letters sent out each session to incomplete finalists, who have only the CGA program's work experience requirement outstanding (coordinator, student advisement, May 31, 2011).
 - Add details to the 2011-12 Student Handbook's section on professional certification requirements and include reference to the applicable bylaws posted on CGA Ontario's website (manager, admissions and registration, June 30, 2011).

- Implementation Challenges and Strategies:
 - The manager of admissions and registration will need to coordinate with the member registrar to ensure information remains current. However, as the student services department meets weekly and website content is reviewed quarterly by content managers, the coordinator, student advisement will regularly follow the process of seeking updates for information accuracy.
4. Provide additional transparency to prospective students on the opportunity to appeal for entry to the CGA program.
- Action Items, Delivery Timeline and Individual Responsible:
 - Add information about the appeal process for entry to the CGA program on CGA Ontario's website, as well as on application forms for transfer credits and program enrolment (academic credentials coordinator, April 30, 2011).
 - Implementation Challenges and Strategies:
 - The manager of admissions and registration will need to identify the student services staff that will be responsible for answering inquiries about the appeal processes.

Results of the Review – Reasonableness of Fees

Part One: Questions, Analysis and Findings

1. How are fees set? What is the rationale for the amounts and is there an objective basis for the amounts? Are the fees higher than the cost of providing the service? Are the fees higher than those charged for comparable services by other regulators?

Fees are set as part of a comprehensive annual planning process involving CGA Ontario's senior management team, audit-finance committee, executive committee and board of directors. Amounts are based upon long-term projections of expenses and student and member bases, as well as assessments of risk and future needs. As a result, over the long-term, fees are not higher than the costs of providing services. CGA Ontario's fees are comparable and competitive with similar professional program opportunities in the province.

Fees are relevant and necessary for the maintenance and continuous development of student and member programs. The delivery of quality programs is relevant to the Association's responsibility to ensure its members are competent and merit the confidence and trust of all who rely upon their professional knowledge, skills, judgment and integrity. CGA Ontario provides a comprehensive and dynamic curriculum with integrated computer technologies for flexible delivery. The CGA program helps students to develop essential skills necessary to perform and succeed in the business

marketplace, ensuring they have a competitive advantage and provides the Association with the tools to measure and validate students' competencies. Survey feedback shows that members rated the importance of the Association most highly with respect to protecting the designation's high standards, keeping members informed and increasing the designation's profile.

All pricing is geared towards a long-term financial result which recovers costs and ensures continuity of operations to service students and members in accordance with Canada Revenue Agency regulations governing not-for-profit organizations.

2. Do the fees discourage potentially qualified applicants or create hardship for those who do apply? In what circumstances can fees be waived or paid in instalments? Who contributes towards the direct program expenses for students?

The CGA program's design provides students with the opportunity to pursue full-time employment and career advancement while completing studies within a flexible schedule. Program enrolment is structured such that students can enrol in a course module one session (semester) at a time. There is no requirement to enrol and pay for all courses in an academic year at the outset of the year, which is effectively a form of instalment payment plan.

Late fees or service fees may be waived for students in circumstances where there was an administrative error or delay.

The CGA program's work experience requirement promotes the notion of current employment, which facilitates access to employer funding assistance. Feedback from student and member surveys shows that a majority of respondents have received financial support from their employer.

A review of survey responses by former students indicates that fees are not the reason most cited for not completing the CGA program. When current students were asked to provide comments and suggest changes to the program, only two per cent of respondents suggested a reduction of fees.

Feedback gathered from student services advisement staff indicates that students have low awareness of the process for submitting membership applications and dues. There is also low awareness by prospective students of the line of credit option available at a major Canadian bank for students in the CGA program of professional studies.

3. Are there measures to ensure that fees charged by qualifications assessors are reasonable?

CGA Ontario does not influence third party assessment organizations' policies or practices for fee reviews and adjustments. There are no formal measures in place to assess whether fees charged by qualification assessment services and agencies are reasonable. However, CGA Ontario does monitor the fee amounts charged by third party services in order to provide advisement to prospective students and individuals applying for transfer credits.

CGA Ontario endeavours to complete assessments for degree equivalency using its own resources and subscription access to an online database. In cases when CGA Ontario cannot independently determine an applicant's degree equivalency and/or document authenticity, the applicant is required

to have an outside agency evaluate his or her education. Applicants are notified of this requirement and advised on the current fee range charged by third party assessment agencies.

CGA Ontario is currently working with other provincial affiliates to unite resources and develop a national database of transfer credit information. In addition, CGA Ontario is initiating memorandums of understanding with recognized third party education assessment agencies. The agreements will provide assurance that agencies perform their services within declared standards and provide quality assessments within their published timelines.

Part Two: Recommendations

1. Provide additional transparency around membership fee amounts and the registration practice of prorating finalists' initial membership fee upon their application for admission to membership. Students should be advised of the fee calculation and requirement prior to their finalist status and eligibility for membership. Information can be added to the student section of the website and in the Student Handbook.
2. Provide additional transparency around program fees for students. Fee tables and details are available in the Student Handbook, which is available on CGA Ontario's website. Reference to this table can be added to CGA Ontario's website page listing entry fees, dates and forms for students. This information would allow applicants to better understand total program costs, make informed comparisons and plan towards study management and support.
3. Provide additional transparency to prospective students of the student line of credit designed for students in the CGA program. Additional details about the application and approval process are available on CGA Canada's website. Reference to this information should be added to CGA Ontario's website to assist prospective students with understanding and planning for their application efficiently. Details are already posted in the student section of CGA Ontario's website.

Part Three: Implementation Plan

1. Provide additional transparency to students in the CGA program around the registration practice of prorating one's initial membership fee during application for admission to membership.
 - Action Items, Delivery Timeline and Individual Responsible:
 - Create a new page within the student section of CGA Ontario's website dedicated to the admission to membership process and include details about the membership fee calculation for initial dues (coordinator, student advisement, May 31, 2011).
 - Add details to the 2011-12 Student Handbook, in the professional certification requirements section, about the process of prorating

one's initial membership fee (manager of admissions and registration, June 30, 2011).

- Implementation Challenges and Strategies:
 - The coordinator, student advisement will need to coordinate with the manager of admissions and registration and the member services department to ensure content is kept current and updated. However, as website content is reviewed quarterly by content managers, and the admissions department meets weekly, communications will be frequent and monitoring the fee information for accuracy will be manageable.

2. Provide additional transparency around program fees for prospective students.

- Action Items, Delivery Timeline and Individual Responsible:
 - Add a reference to the fee table located within the Student Handbook on CGA Ontario's website. The information should be posted in the section describing fees, dates and forms (academic credentials coordinator, April 30, 2011).
- Implementation Challenges and Strategies:
 - The academic credentials coordinator will need to monitor the website information and ensure that the student handbook posted is accessible. This will be manageable as website content is reviewed quarterly by content managers.

3. Provide additional transparency around the line of credit available to students in the CGA program of professional studies.

- Action Items, Delivery Timeline and Individual Responsible:
 - Add a link on CGA Ontario's website, in the section describing fees, dates and forms, to the PDF information document posted on CGA Canada's website (academic credentials coordinator, April 30, 2011).
- Implementation Challenges and Strategies:
 - The academic credentials coordinator will need to monitor the hyperlink to CGA Canada's website to ensure the document can be found. However, as website content is reviewed quarterly by content managers, monitoring the information will be manageable.

Statement of Approval

I hereby certify that:

- i. I have reviewed the information submitted in this entry-to-practice review report.
- ii. To the best of my knowledge:
 - all information required to be provided in the report is included; and
 - the information contained in the report is accurate.

Name of individual with authority to sign on behalf of the organization: Lori Keith

Title: Vice-President, Student Services

Date: March 1, 2011