



Professional Regulation and Transfer

*Exploring the Impact of Professional Regulation
on Transfer Activity in the BC Transfer System*

*Prepared by Dr. Fiona A.E. McQuarrie, Special Projects Officer, BCCAT
February 2024*

BCCAT

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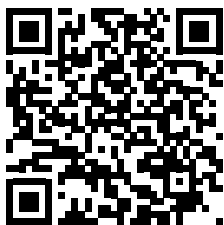
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EXECUTIVE SUMMARY

The regulation of a profession controls access to employment in that profession and sets minimum standards of practice. Professional regulation may also include accreditation of programs that train practitioners; examinations to assess potential practitioners' knowledge and skills; licensing for practitioners, which may also include requirements for ongoing professional development after licensing is granted; or a registry of licensed practitioners.

The BC Transfer System (BCTS) includes member institutions with programs that educate learners for entry to regulated professions. It also includes articulation committees whose members are representatives of those programs. If a regulated profession requires a standardized curriculum or other program features as part of program accreditation or practitioner licensing, this creates a potential conflict with institutional membership in the BC Transfer System. Externally mandated requirements may not respect the autonomy of individual BCTS member institutions to determine the most appropriate curriculum, program structure, or delivery mode for their students or their institutional mandates.

This report was commissioned by the Transfer and Articulation Committee (TAC) of the BC Council on Admissions and Transfer (BCCAT) to investigate these issues. The purpose of the report is to examine the types of professional regulation in British Columbia that interact with institutions and programs in the BCTS, and to assess the extent to which professional regulation affects transfer activity within the BCTS.

Thirteen articulation committees within the BCTS represent programs that are accredited or that prepare graduates to become licensed practitioners. Survey respondents from four of those committees indicated that conflicts do not usually occur between accrediting organizations and programs around transfer credit issues. However, there may be conflicts between these organizations and post-secondary institutions in other areas, such as program admission criteria.

The report makes three recommendations.

1. Receiving institutions and programs that are accredited should ensure that the accrediting organization is aware that the institution belongs to the BC Transfer System, and is aware of the responsibilities and processes associated with BCTS membership.
2. Receiving institutions and accredited programs should examine the relevant requirements for program accreditation and/or practitioner licensing, and identify areas where transfer credit considerations may be relevant.
3. If an accrediting organization does not have policies or guidelines on transferring credit into or out of accredited programs, accredited programs at BCTS member institutions may want to consider working with the organization to develop and implement such policies and guidelines.



The purpose of this report is to examine the types of professional regulation in British Columbia that interact with institutions and programs in the BC Transfer System, and to assess the extent to which professional regulation affects transfer activity within the BC Transfer System.

INTRODUCTION

The regulation of a profession controls access to employment in that profession and sets minimum standards of practice. To ensure that practitioners are sufficiently trained to meet those standards, most professions' regulatory structures identify a body of knowledge that practitioners are expected to be familiar with, and are expected to use appropriately. Regulation of a profession may also include accreditation of programs that train practitioners; examinations to assess potential practitioners' knowledge and skills; practitioner licensing, which may also include requirements for ongoing professional development; or a registry of professional practitioners.

The BC Transfer System (BCTS) includes member institutions with programs that educate learners for entry to regulated professions. It also includes articulation committees whose members are representatives of those programs. The Principles and Guidelines of the BCTS (BCCAT, 2023) state that the system is based on the values of "transparency, fairness, autonomy, predictability and accountability" (para 1) while respecting "differing missions, context, expertise, and modes of delivery" (sec. 4a). However, if a regulated profession requires a standardized curriculum or other program features as part of program accreditation or practitioner licensing, this creates a potential conflict with institutional membership in the BC Transfer System. Externally mandated requirements may not respect the autonomy of individual BCTS member institutions to determine the most appropriate curriculum, program structure, or delivery mode for their students or their institutional mandates.

Another potential source of conflict is institutions with non-accredited programs, or institutions that are not members of the BCTS, offering professional programs similar to those offered by BCTS member institutions. If students with credits from unaccredited programs request transfer credit at BCTS member institutions, accepting non-accredited credit may affect the program's own accreditation, even if the students in the non-accredited program have acquired equivalent knowledge.

This report was commissioned by the Transfer and Articulation Committee (TAC) of the BC Council on Admissions and Transfer (BCCAT) to investigate these issues. The purpose of the report is to examine the types of professional regulation in British Columbia that interact with institutions and programs in the BCTS, and to assess the extent to which professional regulation affects transfer activity within the BCTS.

The scope of this report does not include trades programs. Although there are trades articulation committees in the BCTS, trades training in BC has its own regulatory and oversight body (Skilled Trades BC) that mandates standardized curricula and program structure. Each program includes apprenticeship training and curricula are designed to fulfill interprovincial requirements for the Red Seal endorsement (the Canadian qualification to practice a specific trade). This report also does not address the changes proposed in late 2023 by the BC government to facilitate the recognition of professional credentials acquired outside BC. As noted within the report, the specifics of these changes to current professional accreditation processes in BC have not yet been detailed; however, these changes should be monitored for any potential future impacts.

The *Principles and Guidelines for Transfer* state that the system is based on the values of "transparency, fairness, autonomy, predictability and accountability" while respecting "differing missions, context, expertise, and modes of delivery".

However, if a regulated profession requires a standardized curriculum or other program features as part of program accreditation or practitioner licensing, this creates a potential conflict with institutional membership in the BC Transfer System.

This report begins with a review of published literature on professional regulation. It then outlines the regulatory structures in BC that relate to post-secondary institutions and their programming, assesses the extent to which regulatory structures might affect credit transfer among institutions and programs, and concludes with recommendations for post-secondary institutions and programs that offer curriculum relating to regulated professions.

RESEARCH ON PROFESSIONAL REGULATION

The history of professional regulation dates back to the Middle Ages, when artisans joined together in craft guilds to promote mutual aid, training, and quality control within their own occupations (Kroezen, Ravasi, Sasaki, Żebrowska & Suddaby, 2020). Not surprisingly, with such a long history, there is an extensive body of research on professional and occupational regulation. Researchers have explored topics such as the evolution of regulatory structures and practices, the reasons why a profession or occupation might be regulated, and whether regulation results in desired outcomes such as appropriately educated practitioners and fewer incidents of malpractice.

Research on professional regulation generally does not explicitly address credit transfer between accredited programs or institutions. However, professional regulation of educational programs, or of post-graduation licensing, implicitly involves equivalencies in the content or knowledge acquired by practitioners. Equivalency is also the basis for credit transfer in the BCTS. Individual programs or faculties accredited by a discipline-specific association, such as the Association to Advance Collegiate Schools of Business (AACSB), may refuse to accept credit from programs not accredited by the same association (Quinn Trank & Washington, 2009), but transfer credit does not usually appear to be a consideration in regulation or in granting accreditation.

It has been estimated that approximately 30% of occupations in the US and 20% of occupations in Canada are regulated (Cassidy & Dacass, 2021; Banerjee & Phan, 2014). Regulated occupations include a wide range of types of work, from nursing to real estate sales. There are several reasons why occupations might be regulated, either by the occupation itself, or by governmental agencies. These reasons include:

- Ensuring the public's health and safety
- Enforcing a minimum standard of quality for goods or services provided by practitioners
- Ensuring that practitioners are appropriately trained
- Ensuring consistency in practitioner education
- Ensuring that standards of professional practice are established and maintained
- Ensuring that standards of professional practice are publicly available
- Ensuring that professional titles and designations indicating specific expertise are only used by licensed and qualified practitioners
- Providing a reliable, effective and accountable dispute resolution mechanism to resolve issues around practitioners' performance
- Defining a scope of practice (specific tasks or job responsibilities) that can only be carried out by a licensed practitioner
- Advocating for the profession and its practitioners

The research literature identifies several different forms of professional regulation. These are summarized in **Table 1**.

Table 1: Forms of Professional Regulation

Type of Regulation	Structure	Role of Legislation	Other Features	Examples of Occupations in This Category in Canada
Informal	There are accepted norms of professional practice, but no formal requirements to practice the profession, and no formal regulation of practice.	None	There may be a professional association for practitioners, but these generally have no formal regulatory power.	Journalist Personal trainer
Informal regulation by an association and/or professional designation	An association manages and confers a professional designation, which is granted after completion of standardized education and/or testing. However, the designation is not required to work in the profession.	None	The association may establish required competencies, administer exams to qualify for the designation, and oversee ongoing professional development. It may also accredit educational programs.	Human resource manager Public relations practitioner
Regulation through licensing	Entry to the profession is regulated through passing a licensing exam administered by a professional organization, and/or being included on a registry of practitioners. Some workplaces (e.g. publicly funded or licensed organizations) will only hire licensed or registered practitioners.	Legislation may authorize a professional organization to regulate the profession. Legislation may also define specific workplace tasks that can only be carried out by licensed or registered professionals. Generally, licensing or registration is required to work in the profession.	Completing specified education may or may not be required prior to taking the licensing exam or being listed on the registry. There may be other requirements that candidates must fulfill prior to taking the exam or being listed on the registry, such as completing a work placement.	Early childhood educator Pharmacy technician
Regulation through education and licensing	Entry to the profession is regulated through a licensing exam administered by a professional organization. To be eligible to write the exam, candidates must have completed an accredited program of study at a designated educational institution.	Legislation may authorize a professional organization to regulate the profession. Legislation may also define specific workplace tasks that can only be carried out by licensed professionals. Generally, licensing is required to work in the profession, or in designated workplaces.	The program of study may have to be at a specific level of study (e.g. undergraduate degree-granting). Programs may have to include specific content in order for graduates to qualify for licensing, even if the program itself is accredited. This is usually seen in professions where there are different options for practice.	Primary and secondary school teacher Nurse Accountant Engineer

Note: The categorizations in this table are general; the structure and scope of regulation may vary depending on the occupation and the specific jurisdiction. For example, some US jurisdictions only permit graduates of accredited law programs to write the licensing exam for lawyers, while some jurisdictions allow candidates with other forms of training or experience to write the exam.

An extensive body of research has examined the effects of professionalization and professional regulation on occupations, and some of the unintended side effects.

Experiences of Entering Regulated Professions

Cassidy and Dacass (2021) used US census data from between 2016 to 2019 to examine the labour market experiences of immigrants in licensed occupations. They note that workers in licensed occupations tend to earn a “wage premium” because the licensing requirement limits the numbers of qualified practitioners. Acquiring professional licensing is a way for immigrants to enter more highly paid occupations. The researchers found that while educational attainment increased for both immigrants and non-immigrants during the period covered by the data, immigrants were significantly less likely than non-immigrants to hold any kind of occupational license, credential, or certificate. This was true regardless of whether the license was required to practice, and whether licensing was at the state or federal level.

Interestingly, women were slightly more likely than men to have an occupational license, which the researchers attribute to female immigrants being more likely to enter licensed occupations such as nursing or cosmetology. Additionally, workers who were not proficient in English were less likely to have an occupational license. The researchers suggest that English language proficiency may be more of a barrier to immigrants’ ability to obtain a license than training or job skills. They also suggest that licensing may inhibit rather than improve immigrants’ occupational and economic mobility if licenses are not transferable across jurisdictions.

Banerjee and Phan (2014) conducted a similar study using longitudinal Statistics Canada data. These data tracked 2,935 immigrants who arrived in Canada between 2001 and 2002, and who were admitted as “skilled workers”. On average, these individuals had 16 years of education prior to emigrating, and just over half had obtained additional education after arriving in Canada. About half had worked in a regulated occupation before moving to Canada. The researchers found that while more than 80% of the immigrants with an occupational license obtained outside Canada intended to continue working in their occupation in Canada, only 34% of men and 27% of women were able to obtain Canadian employment in their occupation. Twenty-one percent of immigrants who worked in unregulated occupations prior to emigrating intended to work in a regulated occupation after entering Canada, but only 14% of men and 11% of women were able to do so. Immigrants with previously obtained licenses related to financial and accounting occupations experienced the least post-immigration “occupational downgrading” – working in an occupation unrelated to their licensing - while immigrants with previously obtained licenses related to health care, teaching, and social sciences experienced the greatest occupational downgrading.

The researchers suggest that immigrants being unable to work in licensed occupations in Canada, including occupations they were licensed to practice before they moved, may relate to a lack of clear and transparent Canadian licensing requirements for individuals trained outside Canada. They propose that the process of immigrating to Canada should include more assistance for foreign-trained workers, such as providing detailed information on occupational expectations and requirements in Canada prior to granting an individual permission to emigrate.

George and Chaze (2012) surveyed 309 engineers who had emigrated to Canada about their experiences with the assessment of credentials obtained outside Canada. Seventy-six percent of those surveyed were not aware or only partially aware of the process to become a licensed engineer in Canada. The majority of respondents had approached professional organizations or a college, university, or technical school to have their credentials assessed. Educational institutions’ assessments of non-Canadian engineering credentials were usually the fastest and least expensive form of assessment; however, these assessments were generally not accepted by employers or by professional licensing bodies, which preferred to conduct their own assessments. As a result, at the time the survey was conducted, most of the respondents were not working in the engineering field.

The researchers' data indicate that assessments by professional bodies are the most widely accepted assessments of non-Canadian engineering credentials, but these are generally the most expensive and slowest assessment options. The researchers note that while provincial and federal agencies inform potential immigrants that engineers must be licensed to practice in Canada, the information provided does not clearly identify the assessment sources that will provide the best opportunities for transferring non-Canadian credentials.

The Effects of Licensing Standards

Researchers have also questioned the validity of measures of candidates' qualifications for professional licensing. Meehan and Stephenson (2020) examined pass rates for first-time exam writers of US certified public accountant exams (the exams that candidates must pass to acquire the CPA credential). They compared the exam outcomes in states that required CPA candidates to have 150 credit hours of post-secondary education with the exam outcomes in states that required candidates to have 120 credit hours of education. More candidates wrote the exams in states with the lower credit hour requirement, but there was no difference between the two groups of states in the exam pass rates. The researchers characterize the higher credit hour requirement as a barrier to entry to the profession. Requiring exam candidates to have 150 post-secondary credit hours rather than 120 hours apparently had no impact on exam outcomes, and in many states the additional 30 credit hours did not even need to be in accounting or a related field.

Newman and Surrett (2021) explored whether licensing is an effective method of controlling information and professional practice in an occupation such as dietetics. Professional standards and scopes of practice in dietetics are not consistent across jurisdictions, and therapies involving nutrition can be ordered or administered by medical professionals who are not licensed dietitians. The researchers contend that professional licensing restrictions on sharing supposedly proprietary information may conflict with other broader principles, such as the right to free speech. They recommend that professional standards of practice explicitly identify the information or knowledge that is within the exclusive scope of a profession's practice.

The Effects of Professionalization on Occupations

Aspøy (2020) examined the effects of licensing on a newly designated profession by following the experiences of household and business cleaners when Norway introduced a trades certificate for that occupation. The Norwegian government created the certificate with the intention of improving working conditions for cleaners; increasing compliance with norms for industrial cleaning; and encouraging employers to hire licensed cleaners. At the time the certificate was introduced, a vocational track was also introduced in Norwegian secondary schools, giving students the opportunity to earn a trades certificate which could also be used for admission to designated post-secondary programs. Cleaning was considered "an occupation with a bad reputation" (p. 233); embedding it in an educational system that was perceived as legitimate was intended to improve perceptions of the occupation and thus improve its pay rates.

However, the structure of the industry meant that the introduction of the certificate did not initially result in meaningful change in the cleaning profession. Most cleaning work was acquired by agencies bidding on tendered contracts, which meant that employers tried to keep cleaners' wage rates as low as possible in order to make competitive bids. It was only when cleaning work began to be covered by collective agreements with set pay rates and with language around working conditions that there were improvements in cleaners' pay rates and working conditions. Aspøy concludes that professionalizing an occupation may help promote "upskilling" and better education for workers, but may not result in the workplace autonomy that characterizes traditional professions.

Cai and Kleiner (2020) traced the US pay rates and employment numbers for two similar occupations – occupational therapists (OTs) and physical therapists (PTs) – as these occupations gradually became regulated professions. The researchers note that these professions have different scopes of practice, but some job tasks (e.g. educating patients on injury prevention) can be performed by practitioners of either profession. Their analysis showed that when education requirements increased for PTs, employment increased for OTs, even when OT wages were lower. This suggests that entrants choosing between two similar regulated professions may choose the profession with the lowest barriers to entry. However, a factor that also affected wage rates across time was whether patients were referred directly to practitioners by physicians. In many jurisdictions, physicians could refer patients to PTs but not to OTs. This ongoing demand for PTs' skills kept their wage rates higher, even when there was increased labour market competition from OTs.

Gabre, Fisher, and Ross (2017) explored how licensing may indirectly result in exclusion of specific demographic groups. Their research focused on the low numbers of Hispanic accountants with the CPA designation in the US, despite Hispanics being one of the largest "ethnic" groups in the country. The reasons they identified for this lack of representation include a lack of visible role models, which is especially critical since accounting is not a highly visible occupation; the costs of obtaining the required number of post-secondary credit hours to take the CPA qualifying exams; the cost of participating in pre-exam review courses, and the cost of the fee to take the exam itself; and the reality that individuals can work in accounting, albeit with a restricted range of practice, without having the CPA designation. A survey of 196 Hispanic CPAs indicated generally positive perceptions of the CPA credential and its relationship to job security and higher salaries. The researchers suggest that employers offering assistance to candidates, such as paying exam-related and educational expenses, and giving candidates time off for education and exams, could result in more individuals from under-represented groups in regulated professions.

Moore (2023) suggests that professional regulation in general "promotes adherence to conservative mores" within professions (p. 130). She contends that regulatory bodies may not quickly respond to issues such as a lack of diversity within the practitioner community. Moore examined the US public accounting profession's attempts to diversify practitioner demographics, in the context of accounting in the US being dominated by White males. In Moore's view, the accounting profession's strategies for diversifying have focused on recruitment and image, rather than on addressing structural factors within its regulatory mechanism that may discourage broader participation. For example, the use of subjective terms such as "appropriate" in descriptions of core competencies may lead to culturally-bound interpretations, and vague disciplinary language such as "discrediting the profession" could be used to silence critics who challenge the profession's norms.

Moore also notes the role of regulation in perpetuating historical discrimination. For example, when accounting was professionalized in the US in the early 20th century, Black accountants were effectively excluded from certification, because employment discrimination by White-dominated firms meant that many Black accountants lacked the work experience required to be eligible for licensing.

Givati, Markham, and Street (2018) examined how changes in educational requirements affect practitioner licensing. They studied training requirements for UK paramedics at a time when mandatory education in the profession was shifting from in-house apprenticeships to university-based programs. They observe that the role of universities in training professionals has shifted from "the mere delivery of certificates and credentials" (p. 356) to also providing the ongoing academic education required to maintain licensing. University education also has become a site where common professional values and identities are developed.

Participants in interviews and focus groups indicated that more complex and frequent demands in paramedic work made university-level training more necessary. However, experienced paramedics felt that university programs did not always acknowledge or respect their practical experience. In their view, younger university-educated staff had theoretical knowledge but lacked "discretionary decision-making capacity" (p. 364). Universities providing paramedic training also faced tensions between their own academic

standards and the requirements of the profession: for example, whether to admit applicants with extensive practical experience but lacking the qualifications for general post-secondary admission.

Langbert (2005) describes the challenges of professionalizing an occupation when educational programs offering the same credential do not have consistent curricula. He surveyed 49 master's programs in human resource (HR) management, focusing specifically on master's degrees in that discipline, rather than on MBA programs with an HR concentration. He found inconsistencies in program content and also in structure; for example, a required core course in some programs was an elective in other programs. Langbert also surveyed and interviewed 31 senior HR managers on the competencies they felt were most important in their occupation, in relation to the most common curricula in the programs. The majority of respondents felt that programs should put less emphasis on HR competencies and more on change management and interpersonal skills. He concludes that "HR education lacks a coherent identity" (p. 448) and that "better and more consistent specification...would have a meaningful effect on the entire field's status" (p. 449).

Looking at the same occupation, Ferndale and Brewster (2005) surveyed 22 HR professional associations around the world on their structure, their required qualifications for practitioners, and their regulatory power. In most countries covered by the survey, there was more than one association representing HR practitioners. Most associations offered at least one form of certification for HR-related competencies, with practitioners acquiring certification through workplace experience, training offered by the association itself, or post-secondary education. While nearly every association had professional codes of conduct – which the researchers characterize as an "indicator of the will to develop professionalism in HRM standards" (p. 44) – almost none had any penalties for certified practitioners who did not comply with those codes. This poses a problem for the professionalization of HR as an occupation if "the interests of the business[es]" (p. 44) employing HR professionals are implicitly more important than HR's own standards of practice.

Accreditation and Self-Regulation

Curran, Fleet and Deacon (2006) looked at how inter-disciplinary collaboration was assessed in accreditations of Canadian health care education programs. Interviews with 13 representatives of accrediting agencies indicated that most of the agencies had similar accreditation processes, including a self-study by the educational program, site visits by external assessors, and a final report submitted to a council or committee for a decision on program accreditation. However, there was little evidence that collaboration with other disciplines was part of the required curriculum in accredited programs, except in post-graduate medical education programs for specialists that identified collaboration as a key competency. The researchers suggest that while autonomy is important for professions and for professional regulatory bodies, autonomy can also be a barrier to collaboration and cross-practice work that might benefit both practitioners and the publics they serve.

Adams (2017) looked at criticisms of self-regulation of professions, in relation to globalization and the portability of occupational licensing. The structure of professional regulation differs across countries and professions, as does the amount of restriction on entry to and practice of professions. Self-regulation, when the professional organization controls disciplinary processes involving its own practitioners, has been criticized for putting practitioners' needs ahead of clients' needs; for failing to adequately protect the public; for perpetuating discrimination within and outside the profession; and for inadequately addressing practitioner misconduct. As a result, some governments have created external mechanisms to regulate the behaviour of firms and of individual practitioners, and to promote accountability and transparency in professions' internal regulatory processes.

Adams suggests that “the death of self-regulation in Anglo-American professions has been exaggerated” (p. 85) but also questions whether government or corporate oversight of professions is a feasible alternative to professions regulating themselves, particularly in providing comparable protections to the public. Self-regulation can be perceived as unduly protecting practitioners’ self-interest, but government regulation of professions may lead to oversight by individuals or agencies unfamiliar with the practices of the profession, and create “barriers to efficiency and innovation” (p. 326) that may hinder rather than assist professional organizations (Adams, 2022).

Evetts (2011) examined historical changes in the work of licensed professionals, evolving from self-employment to also encompass employment in organizations with their own sets of regulations and constraints. She draws a distinction between professions as occupations and the concept of “professionalism”, which she defines as working collegially and co-operatively to support democratic and societal ideals. The two are not completely separate, as professional standards in most regulated occupations also reflect the ideal of professionalism, but professionalism can be present even in occupations that are not regulated.

Evetts predicts that globalization will broaden labour markets for qualified professionals, which may require professions to harmonize their qualifications and practice standards across jurisdictions. However, she notes, expansion also raises the issue of who benefits from harmonization and what benefits they may realize. “Professionalism is being used to convince, cajole and persuade employees, practitioners and other workers to perform and behave in ways which the organization or institution deem to be appropriate, effective, and efficient...This leaves space for professional institutions and professional workers to act as a countervailing force against organizational, political, and state bureaucracies of ideological control” (p. 32).

Noordegraaf (2020) acknowledges that professions protect their practitioners by ensuring they have autonomy in their work and can resist commercial pressures on their decision-making. He argues, however, that autonomy may be problematic in workplaces and organizations with internal and external dependencies. He proposes that professionalism be redefined as connective rather than protective. Professional regulators could link practitioners more closely to the communities and demographics they serve through, for example, including inter-disciplinary collaboration skills in core competencies required for professional licensing. Professional education, both pre- and post-licensing, could also be expanded to incorporate disciplinary knowledge and research from other fields of study.

Adams (2022) interviewed 46 representatives of Canadian professional healthcare associations to explore how these associations responded to external changes, such as legislative amendments, which reduced the extent of their professions’ self-regulation. Many interviewees mentioned that external agencies were quick to respond to professions’ perceived failures of self-regulation, but rarely consulted the relevant professional associations or sufficiently investigated the failures. However, interviewees acknowledged that internal changes in associations’ regulatory processes were often necessary to maintain the associations’ perceived legitimacy. Associations often adopted practices from other similar organizations that were seen as appropriate. Adams notes that many association representatives were not members of the professions that their associations oversaw, which brought differing perspectives to the issue of whether the professions should continue to be self-regulating, or should continue to have the same amount of self-regulatory authority.

PROFESSIONAL REGULATION IN BC

Professional and occupational regulation in BC takes several different forms. There are nearly 50 professional regulatory organizations in the province (WorkBC, 2023), with some organizations regulating more than one profession. For example, the BC College of Oral Health Professionals regulates the professional practice of certified dental assistants, dental hygienists, dental technicians, dental therapists, dentists and denturists.

The province has a Superintendent of Professional Governance, whose role is to oversee the administration of the provincial Professional Governance Act. At present, the superintendent's mandate encompasses the regulatory bodies governing the practice of agrology, applied science technology, applied biology, engineering and geoscience, architecture, and forestry (BC Office of the Superintendent, 2023). There is also a provincial Health Professions Act which governs the practice of 25 health-related professions organized into 15 regulated colleges (BC Ministry of Health, 2023); a new Health Professions and Occupations Act, which would create the role of a superintendent for the occupations governed by this act, was approved in 2022 but has not yet been implemented.

In the fall of 2023, the BC government introduced the International Credentials Recognition Act, which will "require regulatory bodies to remove barriers in 29 professions and make it easier and quicker for those qualified professionals to seek credential recognition" (BC Government News, 2023). It is unclear at the time of writing what specific regulatory processes will be changed, how they will be changed, or how these changes may affect post-secondary credential programs related to these professions.

The data collection for this report identified the BCTS articulation committees related to regulated occupations.

Those committees were surveyed on whether programs had experienced conflicts between transfer credit and professional regulation.

METHODOLOGY

The data collection for this report had two steps. The first was to identify the BCTS articulation committees related to occupations that are professionally regulated in BC. The second was to survey those committees on whether any of the programs represented on the committee had experienced conflicts between requests for transfer credit and the accreditation or regulation of their program. These two steps will be discussed separately.

Regulated Professions and Articulation Committees

Table 2 lists the articulation committees in BC whose programs relate to regulated occupations in the province, excluding trades occupations.

Table 2: Non-Trades Occupations in BC Represented on Articulation Committees

Occupation	Regulatory Organization	Relevant BC Legislation	Licensing Required to Practice	Articulation Committee
Accountant	Chartered Professional Accountants of BC	Chartered Professional Accountants Act	Only licensed practitioners can provide the regulated services defined in the Act	Business [Business Educators Articulation Committee]
Agrologist	BC Institute of Agrologists	Professional Governance Act	Only licensed practitioners can provide the regulated services defined in the Act	Agriculture & Horticulture
Biologist	College of Applied Biology	Professional Governance Act	Only licensed practitioners can provide the regulated services defined in the Act	Biology, Environmental Studies
Dental assistant	BC College of Oral Health Professionals	Health Professions Act	Yes	Dental Assisting
Dental hygienist	BC College of Oral Health Professionals	Health Professions Act; Dental Hygienists Regulation	Yes	Dental Hygienist
Early childhood educator	Early Childhood Educator Registry	n/a	Yes, to work in a licensed facility	Early Childhood Education
Engineer	Engineers and Geoscientists BC	Professional Governance Act	Yes	Engineering
Engineering technology professional	Applied Science and Engineering Technology Association of BC	Professional Governance Act	Yes	Engineering
Health care assistant	BC Care Aide & Community Health Registry	n/a	Yes	Health Care Assistant and Practical Nurse
Human resource manager	CPHR BC (Chartered Professionals in Human Resources, BC & Yukon)	n/a	No	Business
Landscape architect	BC Society of Landscape Architects	Architects (Landscape) Act	Yes, to use the title of landscape architect	Agriculture & Horticulture
Licensed practical nurse (LPN)	BC College of Nurses and Midwives	Health Professions Act; Nurses (Licensed Practical) Regulation	Yes, to work in a licensed facility	Health Care Assistant and Practical Nurse

Occupation	Regulatory Organization	Relevant BC Legislation	Licensing Required to Practice	Articulation Committee
Music teacher	BC Registered Music Teachers' Association	n/a	No	Music
Professional chemist	Association of the Chemical Profession of BC	n/a	No	Chemistry
Professional forester, forest technologist	Forest Professionals BC	Professional Governance Act	Yes, to practice as a professional forester or technologist	Forestry and Sustainable Resource Management
Psychologist	BC Psychological Association	Health Professions Act; Psychologists Regulation	Yes, to be a registered psychologist and to use the title "psychologist"	Psychology
Social worker	BC College of Social Workers	Social Workers Act	Yes	Human Services

Regulated non-trades occupations in BC not represented by an articulation committee: acupuncturist, architect, chiropractor, dietitian, emergency medical assistant, insurer, lawyer, K-12 teacher, massage therapist, midwife, mortgage broker, naturopathic physician, occupational therapist, optician, optometrist, pharmacist, physical therapist, physician, public notary, realtor, stockbroker, surgeon, speech and hearing therapist, traditional Chinese medicine practitioner, and veterinarian. Some registered nursing programs send representatives to the Anatomy, Physiology and Pathology (the Health Educators) articulation committee meetings.

As can be seen in **Table 2**, the extent of professional regulation varies across professions in BC, from voluntary licensing of practitioners to licensing being required to work in specified workplaces, to carry out specific tasks, or to use specified titles. Table 2 also shows that some articulation committees represent more than one regulated profession. This somewhat complicates the issue of the relationship between articulation and professional regulation, as a single articulation committee may represent programs with different kinds of regulation.

The professions identified in Table 2 that will be affected by the BC government's proposals for recognition of non-BC credentials are: music teacher, professional engineer, early childhood educator, early childhood education assistant, social worker, professional biologist, chartered professional accountant, agrologist, professional forester, and forest technician.

Survey of Articulation Committees

In October 2023, a link to an online survey was sent to the chairs of the 13 articulation committees identified in Table 2. Three of these committees represent more than one type of program related to a regulated profession. The survey questions explored the types of professional regulation relevant to the committee, and explored whether program or practitioner regulation affected transfer credit activity in the programs represented on the committee.

Four survey responses were received, for a 30% response rate. While this is an acceptable response rate for an online survey (Wu, Zhao, and Files-Aime, 2022), because of the wide variety of types of professional regulation in BC, the data from the survey cannot be considered representative of the entire BCTS. Thus the data below are presented for information, not as definitive results.

The number of external regulatory organizations related to the committee's subject area ranged from one to three. Three of the related occupations required practitioners to graduate from an accredited program and pass a qualifying exam; one required

graduation from an accredited program; and one did not require licensing for practitioners. Three of the related occupations required both program accreditation and practitioner licensing, with accreditation and licensing administered by a professional college or association.

The respondents reported that for a program to be accredited it needed to have a minimum number of hours or semesters of instruction (two respondents), a minimum level of qualification for instructors (two respondents), and/or specific admission standards (two respondents). A specific curriculum or required courses was mentioned as an accreditation requirement by one respondent.

There were varying amounts of interaction between the programs and the accrediting organizations. Two respondents indicated that program staff or faculty participate in the activities of the accrediting organization, such as being on committees making recommendations on accreditation applications. Two respondents indicated that their accrediting organization consults with them regularly or on specific topics.

None of the responding committees reported non-accredited programs in BC offering similar curricula or courses in their subject area. Two responses indicated that it was very rare for graduates of non-accredited programs to apply for admission or transfer credit in accredited programs.

Respondents were not aware of any accredited institutions experiencing accreditation-related difficulties around granting transfer credit to courses from non-accredited institutions or programs. One response indicated that if such credit was granted, the accrediting organization might require the program to provide an explanation for that decision. Another response indicated that courses taught by instructors without the appropriate qualifications might mean that those courses would not count towards the number of courses required to maintain accreditation.

Finally, one respondent noted that their accrediting organization relies on their institution to provide post-degree courses that practitioners must take to qualify for licensing. Another noted that in their discipline, receiving institutions are responsible for informing sending institutions of the courses, curriculum and program standards required for students to be able to transfer, and that receiving institutions will only deal with sending institutions that meet those requirements.

DISCUSSION AND RECOMMENDATIONS

Although the potential exists for conflict between program accreditation and/or practitioner licensing requirements and transfer credit mobility within the BCTS, the data collected for this report indicate that such conflicts are not a significant or frequent problem.

Anecdotal evidence indicates that if accreditation-related conflicts occur at BCTS member institutions, these may be occurring in areas other than articulation or transfer. For example, accrediting organizations' minimum admission requirements for accredited programs may be more rigorous than institutions' or programs' own admission requirements. This may be a problem for institutions or programs if, for example, an accreditation requirement for English language proficiency at admission is more rigorous than the institution's or program's own language proficiency requirement. An admission requirement for a higher level of English proficiency may exclude applicants whose first language is not English, or who have previously trained or worked in settings where communication was not in English, even if their qualifications meet or exceed all the other admission criteria.

It is also apparent from the limited survey data that programs related to regulated occupations offer more than standard undergraduate degree programs. Some offer courses for professionals accredited in other jurisdictions, to prepare them for eligibility to practice in BC. Some offer post-graduation courses or credentials that qualify as professional development for practitioners. This programming is particularly important for occupations or professions whose practitioners must fulfill professional development

requirements to maintain their licensing. It is unlikely that transfer credit would be relevant to these types of programs, given their specialized nature, but accreditation standards that recognize these programs as professional development may conflict with institutional or program standards in areas such as admissions.

An obvious topic for further research is investigating areas other than transfer where accreditation requirements and institutional policies might conflict. The following recommendations are intended for programs, administrators, and articulation committees in areas related to regulated or professionalized occupations in BC, and for any readers interested in professional occupations or transfer credit issues in general.

- 1. Receiving institutions and programs that are accredited should ensure that the accrediting organization is aware that the institution belongs to the BC Transfer System, and is aware of the responsibilities and processes associated with BCTS membership.**

This may be particularly important for programs accredited by organizations that are unfamiliar with BC's well-established transfer credit system, which is the most extensive in Canada. Accrediting organizations may be more familiar with post-secondary environments that have less transfer activity, or less effective transfer systems. It is important for organizations accrediting BC programs to understand the role of articulation in BC's post-secondary system, and to understand how institutions' commitments as BCTS members might intersect with the organization's own accreditation requirements and expectations.

- 2. Receiving institutions and accredited programs should examine the relevant requirements for program accreditation and/or practitioner licensing, and identify areas where transfer credit considerations may be relevant.**

These areas may include transfer of credit to and from non-accredited programs, or students with credentials from other institutions wanting to transfer credit into a more advanced credential program. Identifying areas of potential conflict may be particularly important if granting transfer credit may threaten the program's continued accreditation or eligibility for re-accreditation.

- 3. If an accrediting organization does not have policies or guidelines on transferring credit into or out of accredited programs, accredited programs at BCTS member institutions may want to consider working with the organization to develop and implement such policies and guidelines.**

The issue of transferring credit may be particularly timely for accrediting organizations, with more attention now being paid to improving inter-provincial and international mobility for licensed practitioners. This mobility can be facilitated by accrediting organizations clearly explaining if or how credit from previously acquired credentials can be transferred to accredited programs in BC or in Canada.

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