Online Submission to Immigration, Refugees and Citizenship Canada on the National Conversation on Immigration Consultation

Chartered Professional Accountants of Canada

August 2016
Chartered Professional Accountants of Canada is pleased to respond to Immigration, Refugees and Citizenship Canada’s invitation to comment on this consultation which will determine the way forward on immigration to Canada.

Chartered Professional Accountants of Canada is the national body of Canada’s newly unified accounting profession, representing more than 200,000 professional accountants across Canada and abroad and is one of the largest accounting bodies in the world. The Canadian CPA profession unites the members of three legacy accounting bodies: Chartered Accountants, Certified Management Accountants and Certified General Accountants. The observations and recommendations submitted here are limited to immigration issues directly relevant to CPA Canada and our members, and more broadly relevant to regulated professions and the skilled worker class.

**Theme 1: Strengthening our Canadian fabric**

The current demographic realities of Canada’s labour market are well known. An aging population, baby boomer retirements, and birth rates significantly below replacement combine to create the need for immigration to ensure labour market requirements are met. The Conference Board of Canada’s National Immigration Centre, of which CPA Canada is a sponsor, predicts that within the next 20 years, five million Canadians will retire, and a quarter of the population will be 65; according to their projections, by 2035 we will need 350,000 immigrants per year (about 1% of the population) to choose Canada and become citizens and continue to build our nation.

CPA Canada supports this recommendation to ensure ongoing prosperity, and notes that this significant increase in annual intake allows room for Canada to welcome skilled workers, families, and refugees.

These general demographic forces are true for the accounting profession. Canada’s 200,000+ professional accountants work in every sector of the economy, including large and small organizations in business, industry, public practice (accounting firms), not for profit organizations, government and education. Our own ten-year occupation demand study undertaken last year suggests that demand for professional accountants is growing. At the same time, fully half our membership is now over 45; 10,000 are over 65. Our projections suggest that over the next decade we will need to admit to membership 10,000 to 13,000 new CPAs each year to meet the combined demand created by growing opportunity and projected retirements.

It takes at least seven years of post-secondary education and 30 months of defined progressive experience (generally gained concurrently) to earn a Canadian CPA designation. Based on current and projected enrolment in post-secondary institutions and our own professional programs, the profession cannot meet this projected demand domestically, and will require the successful integration of internationally educated professionals.
For these reasons CPA Canada recommends continued emphasis on the skilled worker class.

Family class immigration also supports efforts to attract top global talent. While CPA Canada does not have a recommendation on family class numbers, we do have qualitative research that suggests the ability to bring families to Canada is a motivating factor in attracting and keeping top talent.

Supporting skilled workers to ensure their timely integration into the Canadian workforce is a major challenge, particularly for regulated professions where protection of the public interest demands that all professionals meet Canadian standards. Technically skilled immigrants from many of today’s top source countries do not share the same language, professional standards, and / or workplace culture as Canada, and these are critical challenges to labour market access.

In the past the Government of Canada has provided support to regulatory bodies to encourage the fast, fair, transparent assessment of international credentials. CPA Canada recommends that the Government of Canada continue to provide and expand this support, particularly in the areas of:

1. Pre-arrival supports: to develop and offer bridging and other programs pre-arrival to enable immigrants to begin preparing for Canadian qualification before they arrive in Canada, including online learning programs and international test centres.
2. Prior Learning Assessments: foreign credential and other prior learning assessments, in particular the assessment of experiential learning is a major challenge for many professions long accustomed to measuring education inputs rather than competency outputs.
3. Bridging programs: that provide the required competencies without demanding unnecessary repetition of education and experience to meet Canadian standards.
4. Data analytics: measuring and analyzing the progress of internationally trained professionals can identify appropriate interventions that will aid in their success.
5. Language proficiency: addressing the challenges of language proficiency for skilled workers in general and for regulated professions in particular, through transparency and support of occupational language benchmarking and training programs that provide professional language proficiency development; while the increase in language requirement to CLB 7 for the skilled worker class is a big step forward, it is still insufficient for many skilled jobs and regulated professions. Occupation specific language benchmarking is beyond the financial capability of many regulatory bodies. Internationally trained skilled workers deserve transparency around the language requirements for job access and promotion.
6. Workplace culture: addressing the challenges of workplace culture through the support of programs for both international professionals and Canadian employers to encourage workplace cultural understanding and appropriate accommodation. Many internationally trained professionals with strong credentials fail to find jobs in Canada or to progress in those jobs for reasons directly related to the challenges in recognizing and adapting to workplace and profession-specific norms.
7. Mentorship programs: especially programs that link newcomers with members of their own international professional bodies who have been successful in earning Canadian credentials and integrating into the Canadian workplace.

**Theme 2: Unlocking Canada's diverse needs**

As we move toward a global economy, diverse thinking will be critical in making Canada competitive. Viewing the world through a Canada-only lens will hinder our ability to see new opportunities and result in our businesses doing things “as they’ve always been done.” Newcomers offer new, fresh, global perspectives and connections.

In terms of the accounting profession, the immigration of internationally trained professionals can help fill the gap left by the large numbers of members we expect to see retire over the next decade, contributing to meeting projected demand as identified above. Further, we know there is significant internationally trained talent both here in Canada and internationally who want to earn their Canadian credentials and contribute fully to the Canadian economy. Currently we assess over 20,000 applicants to our prerequisite and professional programs each year; half of them have at least some international accounting education. Consultation with World Education Services (WES), which is accredited to assess international qualifications for immigration purposes under the Federal Skilled Worker program, reveals that accountants are the second largest group; in 2015 alone they assessed the accounting education of more than 7000 international applicants. Accountants were also the only regulated profession in the top 10 occupations of invited applicants in the first year of the new Express Entry process.

With regard to Express Entry, however, CPA Canada recommends the Government of Canada re-examine the points awarded for age. Current rules are heavily skewed to benefit young applicants, and penalize mature professionals, IT, and business and management talent. Most regulated professions require many years of study; mature professionals and managers have much to offer, and should not be penalized based on age. We further recommend support for regulated professions to develop bridging programs specifically for mature professionals.

Success in the Canadian workplace is contingent on both the technical skills of newcomers, and on their understanding and ability to adapt to Canadian workplace norms, which incorporate Canadian culture and traditions, and from the perspective of a regulated profession, also incorporate professional standards and ethics. These norms can be substantially different from those of their home countries. Our research with employers of internationally trained accountants reveals that this can be a serious barrier both to job access and to promotion. CPA Canada is making specific efforts to support internationally trained professionals in understanding the norms and expectations of the Canadian
accounting workplace; we suggest that work is needed across all sectors to support both employers and newcomers in understanding and articulating these cultural norms and expectations. Our experience is that education is the key to understanding.

**Theme 3: Modernizing our immigration system**

Yearly planning for immigration is not strategic. As noted in section 1 above, there is a plethora of data on Canada’s demographic trends and workforce challenges, as well as on the need to support our health care systems and national pension plan. CPA Canada recommends that immigration strategy be developed with a much longer-term focus. We also recommend ongoing coordination among federal, provincial and territorial government strategies, which is especially critical for regulated professions, virtually all of which are provincially/territorially regulated.

Data-driven decision-making will be critical to ensure Canada attracts the right skills at the right time. In today’s rapidly changing world, currency is critical, but predictive data on job demand is often weak and outdated; the 2012 NOC codes, for example, due to be updated this year, are seriously outdated and challenging to work with from a projection perspective. A five year update cycle is too long in today’s rapidly changing economy. While we understand that NOC codes are intended to define occupations rather than professions, we struggle with identifying meaningful data, as CPAs work under many different NOC codes, but are included under only one – which covers less than 20% of the profession. It may be possible for regulated professions to partner with government at all levels in identifying and developing reliable occupation demand data, and while it will be a major challenge to aggregate information gathered municipally, provincially/territorially, and nationally under a myriad of incompatible data platforms, we suggest that the Government of Canada consult on a framework to assess the true data needs, ensure appropriate currency in its own data, and engage in dialogue with professions and occupations to develop meaningful information from multiple data sources.

In terms of regulated professions, we also recommend coordination with regulatory bodies in determining market demand and credential assessment. While there has been progress in this area, more is needed.

**Theme 4: Leadership in global migration and immigration**

One way Canada can attract the best talent and international students is by offering globally recognized education and training programs and employment experience. Establishing and maintaining high standards that are attainable and respected worldwide will draw international students to Canada; those who stay will enrich Canada, while those who leave will bring Canada to the world. By establishing
a reputation as a place to develop skills and experience to grow domestically and export globally, Canada will attract people will the skills and experience to contribute to the Canadian and international economies.

Accounting has long been a global profession and has worked through many challenges that other regulated professions are now facing. The Canadian profession has been addressing credential recognition challenges for more than 40 years. Worldwide, accounting is one of the most accessible professions in terms of cost and flexibility, partly because it offers its own education programs rather than delegating education exclusively to post-secondary institutions. Profession-delivered education allows for innovation, adaptation to changing global standards, and superior geographical access. This is especially true in Canada, where the CPA Profession offers a world-recognized graduate level professional education program in both official languages, nationally developed and regionally delivered, using multiple platforms and the latest education technology to provide the widest possible access. The CPA Professional Education Program is designed to be completed part time over two years, generally while the student is employed full time in a relevant, progressive position. On completion, the student earns a globally recognized designation.

Despite our world-recognized standards, the CPA profession is challenged to admit international students, including those with qualifying Canadian undergraduate degrees, into our professional program, which requires both academic and practical experience components. CPA students normally work full time while studying for their designation. Student visas limit work to 20 hours per week; employers of CPA students generally hire for full time positions. Work visas limit access to education programs longer than six months that lead to a professional credential to public post-secondary institutions and Designated Learning Institutions, requiring our bodies to be designated as DLIs. However, our innovative education model requires no “bricks and mortar” institution, and so does not meet DLI requirements in all jurisdictions. Thus under current immigration rules, international students must either have both work and study visas to complete the CPA designation, or must register in university-based programs that we have accredited – programs that are more expensive, less flexible and are only available in larger centres. This can create a barrier for international students wanting to pursue the Canadian CPA designation.

The most efficient way to meet Canada’s demands for skilled professionals through immigration is to be able to draw from the ranks of international students earning a Canadian education. CPA Canada recommends that federal and provincial governments reconsider the rules around DLI requirements for regulated professions and ensure that visa requirements do not pose barriers to qualified international students who wish to pursue a professional designation.