

ACTION PLAN -YEAR 1 PROGRESS UPDATE
NOVA SCOTIA ENVIRONMENT – PETROLEUM STORAGE TANK INSTALLER

As per the following Action Plan Progress Report and FRPA Review Officer comments, all areas of non-compliance, as originally identified in the May 2021 FRPA review report, have now been addressed.

ACTION PLAN TIMELINES:

TIMELINES FOR ACTION PLAN PROGRESS UPDATES					
	Action Plan Deadline	Action Plan Progress Update 1			
Due Date	2021-03-31	2022-06-08			
Actual Completed Date	2021-05-20	2022-06-08			

ACTION PLAN:

ACTION PLAN – AREA #1:	Response to FRPA Review Question #2 (Communication of registration/application process to applicants):
FRPA SECTIONS:	Sections 6, 7(a), (c), 9(a), 16(3)(a), (b) and (g)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	Areas of non-compliance to be addressed in an action plan are as follows: <ul style="list-style-type: none"> - provide clear instructions on what documentation must accompany applications - ensure that information regarding registration requirements and how requirements are to be met is clear and easily accessible in the public domain through print and electronic media.
REGULATOR ACTION PLAN:	<ul style="list-style-type: none"> • Update the application process to ensure instructions and all requirements including supporting documentation are clear. • The website will be updated to communicate the corresponding requirements in a manner that is easily accessible.
INTENDED COMPLETION DATE:	March 2022* *CNS advised of delays for website changes due to Covid response.
Year 1: Action Plan update. Due: 2022-06-08	The application process has been clarified and updated. The website has been updated to reflect the new information
FRPA Review Officer Comments (2022-06-28)	The above noted areas of non-compliance have been addressed.

ACTION PLAN – AREA #2:	Response to FRPA Review Question #3 (Registration of International Applicants):
FRPA SECTIONS:	Sections 6, 7(a), (c), 9(a), 16(a), (b) and (g)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	Areas of non-compliance to be addressed in an action plan are as follows: <ul style="list-style-type: none"> - ensure that information regarding registration requirements and how requirements are to be met by applicants who received their qualifications outside of Canada is clear and easily accessible in the public domain through print and electronic media. - provide clear instructions on what documentation must accompany applications
REGULATOR ACTION PLAN:	<ul style="list-style-type: none"> • Update the application process to ensure instructions including accompanying documentation and all requirements for applicants outside of Canada are provided. • Update the website information with clear and readily accessible instructions and required documentation for applicants seeking reciprocity. • The Department has contacted the Labour Mobility Coordinator for assistance and advice. • Integral to this Action will be completing and implementing the revised Standards referred to in the Overview of the Regulating Body portion of this Report. • When the revised Standards are approved, we will inform all affected stakeholders as well as update our website

INTENDED COMPLETION DATE:	March 2023*.
Year 1: Action Plan update. Due: 2022-06-08	The Department has received limited feedback from jurisdictions responding to inquiries from the Labour Mobility Coordinator. The revised Technical Standards have been completed, approved and issued to stakeholders and are available on the Department's website. Information gathering and analysis continues with a goal of meeting the completion date of March 2023
FRPA Review Officer Comments (2022-06-28)	The information currently available on the website is sufficient to meet all the requirements of the FRPA Sections quoted above as they pertain to international applicants.

ACTION PLAN – AREA #3:	Response to FRPA Review Question #4 (Registration of Interprovincial Applicants):
FRPA SECTIONS:	Sections 3, 6, 7(a), (c), 9(a), 16(a), (b) and (g)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - ensure that information about registration requirements and how requirements are to be met by applicants who received their qualification outside NS but within Canada is clear and easily accessible in the public domain through print and electronic media. - ensure that information about registration requirements and how requirements are to be met by applicants registered in another Canadian jurisdiction are based on certificate-to-certificate recognition and are clear and easily accessible on the public domain through print and electronic media. - provide clear instructions on what documentation must accompany applications
REGULATOR ACTION PLAN:	<ul style="list-style-type: none"> • Update the application process to ensure instructions including accompanying documentation and all requirements for applicants in another Canadian jurisdiction are provided. • Update the website information with clear and readily accessible instructions and required documentation for applicants seeking reciprocity. • The Department has contacted the Labour Mobility Coordinator for assistance and advice. • Integral to this Action will be completing and implementing the revised Standards referred to in the Overview of the Regulating Body portion of this Report. • This will involve a jurisdictional review to inform the final result as well as build in resiliency where possible to ensure that the revised Standards remain current with changes to industry-lead standards such as ULC and CSA.
INTENDED COMPLETION DATE:	March 2023.
Year 1: Action Plan update. Due: 2022-06-08	Information on other jurisdictions is being collected and analysed. Target date for completion is still March 2023
FRPA Review Officer Comments (2022-06-28)	The information currently available on the website is sufficient to meet all the requirements of the FRPA Sections quoted above as they pertain to interprovincial applicants.

ACTION PLAN – AREA #4:	Response to FRPA Review Question #6 (Allowance for Alternative Documentation):
FRPA SECTIONS:	Sections 9(b), 16(3)(c)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document guidelines that describe alternatives that would be acceptable when documentation that must accompany an application cannot be obtained for reasons beyond the applicant's control
REGULATOR ACTION PLAN:	Update and document guidelines that describe acceptable alternatives for documentation to accompany an application that cannot be obtained for reasons beyond the applicant's control.
INTENDED COMPLETION DATE:	March 2022
Year 1: Action Plan update. Due: 2022-06-08	A process for determining acceptable alternatives to required documentation has been included in revised process information and added to website
FRPA Review Officer Comments (2022-06-28)	The above noted areas of non-compliance have been addressed.

ACTION PLAN – AREA #5:	Response to FRPA Review Questions #8 and #9 (Accommodation Practices for Applicants with A Physical or Mental Disability):
FRPA SECTIONS:	Section 16(3)(h)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a description of the accommodation practices for applicants which includes: <ul style="list-style-type: none"> - how to request an accommodation - guidelines regarding types of accommodations - ensure that practices are adaptable if a new situation arises
REGULATOR ACTION PLAN:	<ul style="list-style-type: none"> • Develop and document a description for adaptive accommodation practices for applicants requesting physical or mental accommodations. • Information on accommodation practices will be clear and accessible on our website.
INTENDED COMPLETION DATE:	<p>May 2022*</p> <p>*CNS advised of delays for website changes due to Covid response.</p>
Year 1: Action Plan update. Due: 2022-06-08	A formal accommodation policy has been developed and approved by the Department for applicants for certification
FRPA Review Officer Comments (2022-06-28)	The information currently available on the website is sufficient to meet the requirements of Sections 16(3)(h) of the FRPA.

ACTION PLAN – AREA #6:	Response to FRPA Review Questions #10 and #11 (Assessment Criteria):
FRPA SECTIONS:	Sections 7(a), (d), 16(3)(b) and (i)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document all criteria that are used to assess whether requirements for certification have been met - ensure that information is clear and easily accessible in the public domain through print and electronic media.
REGULATOR ACTION PLAN:	<ul style="list-style-type: none"> • Develop and document all criteria to assess whether requirements have been met, including roles and steps by a third party. The process will be described in a clear, concise written document and will be easily accessible on our website. • Develop and document all criteria to assess whether requirements have been met and made available to applicants. The process will be clearly described and accessible on our website.
INTENDED COMPLETION DATE:	<p>March 2022*</p> <p>*CNS advised of delays for website changes due to Covid response.</p>
Year 1: Action Plan update. Due: 2022-06-08	All criteria for assessing applications have been clarified and added to the website
FRPA Review Officer Comments (2022-06-28)	The above noted areas of non-compliance have been addressed.

ACTION PLAN – AREA #7:	Response to FRPA Review Question #12 (Communicating Reasons for Registration Decisions):
FRPA SECTIONS:	Sections 8(c), 10(1)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a process to ensure that applicants who are not granted registration are provided with a written decision that includes the reasons why registration has been denied - ensure that information about the internal review process is provided to applicants who have not been granted registration.
REGULATOR ACTION PLAN:	Develop and document a process for providing reasons why an application was not approved. This process will be made available to applicants through the website and alternative means where necessary.
INTENDED COMPLETION DATE:	<p>March 2022*</p> <p>*CNS advised of delays for website changes due to Covid response.</p>
Year 1: Action Plan update. Due: 2022-06-08	A process for providing written reasons where an application is not successful has been developed and added to the website
FRPA Review Officer Comments (2022-06-28)	The above noted areas of non-compliance have been addressed.

ACTION PLAN – AREA #8:	Response to FRPA Review Question #14 (Internal Review Process):
FRPA SECTIONS:	Sections 7(a), 10(1)(2)(4) and 16(3)(m)
AREAS OF NON-COMPLIANCE TO BE ADDRESSED:	<p>Areas of non-compliance to be addressed in an action plan are as follows:</p> <ul style="list-style-type: none"> - document a clearly defined process for an internal review of the registration decision which includes: <ul style="list-style-type: none"> - procedures - timeframes - opportunities the applicant has to provide new information and to make submissions in support of their position (e.g. documented evidence, hearing, etc.) - ensure that information on the internal review process is clear and easily accessible in the public domain through print and electronic media - document the timeline and process by which an applicant who has been denied registration is informed about the procedures and time frames for the internal review.
REGULATOR ACTION PLAN:	<ul style="list-style-type: none"> • Ensure the current appeal process with the procedure, timelines and submission requirements is clearly defined, documented and accessible on our website. • The reasons for denying certification will be provided in writing and will include the availability of a review/appeal and a description of the above process. Communication will include a link to the Notice of Appeal Form.
INTENDED COMPLETION DATE:	<p>March 2022*</p> <p>*CNS advised of delays for website changes due to Covid response.</p>
Year 1: Action Plan update. Due: 2022-06-08	A clear process for conducting internal reviews of registration decisions and an appeal process has been provided on the website
FRPA Review Officer Comments (2022-06-28)	The above noted areas of non-compliance have been addressed.

SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

Brent Baxter

Name (print): Brent Baxter, P. Eng
DATE: 2022-07-20