
OAA Policy on Acceptable Alternatives to Qualification Documents

Procedure Reference	Alternative Documentation Policy as Required by the Regulations of the <i>Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)</i>
Issue Date	January 1, 2026
Revision Dates	TBD

Background

This policy establishes a framework for individuals to have a reasonable option to submit alternative evidence, in accordance with the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)* and Ontario Regulation 261/22.

Individuals may encounter circumstances beyond their control that prevent them from obtaining the documents required for registration. These barriers can arise from conflict or crisis situations, including war, political instability, or natural disasters, which make it difficult to access records. In some cases, institutions may be closed or uncooperative, or they may refuse to provide necessary documents. In other instances, records may be lost or destroyed due to unforeseen circumstances.

This policy is intended to apply to individuals applying for licence, limited licence, temporary licence, or certificate of practice (CoP), and to individuals pursuing licensure through the OAA's registration practices. When individuals can provide evidence that they have made reasonable efforts and been unsuccessful in obtaining required documents in the required manner, they may be allowed to provide alternative proof that they have fulfilled a particular registration requirement.

Ontario Association of Architects

This policy outlines the alternative documentation process for individuals who are unable to obtain required documents due to circumstances beyond their control, such as war, natural disaster, political persecution, or institutional closure.

The OAA requires verified documentation or proof for the following items:

- citizenship or permanent residency;
- date of birth;
- architectural experience records and proof of licensure of the Supervising Architect;
- proof of the eligible employment situation for the Internship in Architecture Program (IAP) and/or proof of business registration; and
- legal name change certificates (if applicable).

In circumstances where required documentation cannot be provided, alternative evidence such as affidavits or sworn statements may be accepted. Where feasible, the OAA commits to accept alternative documents. Where alternative documentation is limited or insufficient to validate qualifications and precludes the Registrar from issuing any form of licence, limited licence or certificate of practice, the applicant has the right to request a hearing before the OAA's [Registration Committee](#).

Translation of Documents

To ensure the accuracy and integrity of submitted documents, translations provided to the OAA must be translated by a certified translator who is registered with a recognized professional body (such as ATIO) to guarantee the translation is both accurate and reliable. The translator must possess the necessary qualifications to translate documents in the relevant language(s). All translated documents must meet these standards to ensure they are deemed valid for processing by the OAA.

Examples of recognized translation organizations include:

- [Association of Translators and Interpreters of Ontario](#); and
- [Canadian Translators, Terminologists, and Interpreters Council](#).

The translated document must be notarized or include an official translator's seal. It must be accompanied by:

- a signed statement from the translator confirming it is an accurate translation of the original document;
- the translator's credentials (e.g. ATIO certification number); and
- the original document in the source language (or a certified copy).

Translations must be in English or French. If a document is in a language that requires specialized knowledge (e.g. architectural terminology), it is recommended that the translator be experienced in that field. The OAA requires direct submission from the translation agency. The OAA reserves the right to verify the translation with the translator or agency if there are concerns.

Where an individual is unable to obtain translation services through a recognized professional body, the OAA may accept translations completed by another qualified translator. Such translations should ideally be conducted by a qualified professional, which may include translators associated with embassies, consulates, or recognized authorities in the applicant's home jurisdiction. In all cases, the translation must bear the official stamp or seal of the translator and include their name and licence or certification number (if applicable) and contact information.

Circumstances and Alternative Evidence

Any individual who can provide evidence to demonstrate the difficulty in obtaining standard required documentation, due to circumstances beyond their control, may request to have alternative documentation considered in support of meeting requirements for registration or assessment.

Individuals are expected to make reasonable efforts to obtain documents before requesting alternatives. This policy applies to individuals who cannot access standard documents due to extenuating circumstances. These circumstances typically include, but are not limited to:

- lost or destroyed documents (the individual's original records may have been lost or destroyed due to natural disasters, conflict, or other circumstances beyond their control);



- institution closure or challenge (if the institution or government organization has closed or no longer exists, obtaining official documents may be difficult or impossible—this may include instances where the document-issuing institution refuses to provide the documents without justifiable reasons or takes an unreasonable amount of time to respond; and
- risk of harm (instances where there could be harm to the individual from seeking the required documents).

Requests from individuals who cannot obtain the documentation normally required for other compelling reasons outside their control may be considered on a case-by-case basis, consistent with the beneficial intent of this policy. Where an individual cannot obtain required documents through conventional means or if the document issuing organization takes an unreasonable amount of time to respond (i.e. more than three months), the OAA may consider alternative forms of evidence, including:

- government correspondence or government-issued documents;
- notarized affidavits or sworn statements from professionally licensed/registered supervisors;
- copies of previously submitted and validated documentation to other regulatory bodies; and
- verification through third-party agencies/regulatory bodies.

Examples

1. The OAA requires proof of citizenship or permanent residency for issuance of a licence or limited licence. If standard government-issued proof (e.g. passport, permanent resident card) is unavailable, the following may be accepted:
 - relevant government correspondence;
 - confirmation letter from Immigration, Refugees and Citizenship Canada (IRCC); or
 - other government-issued identification that verifies status (e.g. driver's licence with citizenship designation).
2. The OAA requires proof of date of birth for issuance of a licence, limited licence, temporary licence, or certificate of practice. If standard government-issued proof is unavailable, the following may be accepted:
 - relevant government correspondence; or
 - other government-issued identification that verifies date of birth (e.g. driver's licence)
3. The OAA requires validation of international architectural experience (where applicable). If an individual cannot obtain architectural experience records signed off by the Supervising Architect due to extenuating circumstances, alternatives may include:
 - reference letters from a Supervising Architect confirming the experience; or
 - third-party attestation from another Architect in the practice or regulatory body (if previously licensed elsewhere).
4. The OAA requires proof of eligible employment situation for the Internship in Architecture Program and/or proof of business registration. If an individual cannot obtain standard government documents due to extenuating circumstances, alternatives may include:
 - notarized affidavits/statements of an Architect from the practice or regulatory body attesting to the eligibility of the employment situation;
 - other government-issued documents that verify the business registration; or
 - copy of the business registration from the local regulatory body/ministry/business registry.



5. The OAA requires proof of legal name change. If standard government-issued proof is unavailable, the following may be accepted:
 - relevant government correspondence; or
 - other government-issued identification that verifies change (e.g. driver's licence).

Other types of alternative documentation may be acceptable if they include sufficient information to allow the OAA to make a reasonable assessment in accordance with the FARPACTA regulations and the registration policies and procedures of the Association.

Alternative Documentation Process

Requests are assessed on a case-by-case basis. Should there be any questions about the process, individuals are encouraged to discuss their specific circumstances with OAA staff prior to submitting a request to consider alternative documentation. It is the responsibility of the individual to demonstrate efforts made to obtain the standard required documents before requesting an alternative.

1. An individual who is unable to obtain standard required documents may submit the OAA's [Alternative Documentation Request Form](#) along with the supporting evidence to the [Office of the Registrar](#). The form will identify which documents they are unable to obtain and detailed reasons.
2. The individual's request will be assessed by the OAA Registrar, who will determine if alternative documentation will be accepted. The OAA reserves the right to verify the authenticity of submitted alternative documents; any falsified or misleading claims will result in application denial.
3. If the documents provided are in a language other than English or French, the applicant must arrange for their translation in accordance with this policy. Individuals are responsible for any fees associated with the translation of these documents.
4. The Registrar may request that the individual provide additional information or evidence to support their request to provide alternative documentation.
5. Once an individual has submitted a complete Alternative Documentation Request Form, the Office of the Registrar will provide written acknowledgement within 10 business days of that date. The Office of the Registrar will transmit the acknowledgement to the applicant by email and specify whether further documents or information are required. Upon receipt of all required information, the OAA will deliver a written decision within 30 business days.
6. Outcome—Request approved: A request may be approved if the Registrar is satisfied that the required documentation cannot be obtained due to exceptional circumstances and the individual has met the requirement(s) that would otherwise be demonstrated by the required documentation which could not be obtained.
7. Outcome—Request denied: A request may be denied if the Registrar is not satisfied that an individual has made efforts to provide persuasive evidence that required documentation cannot be obtained due to exceptional circumstances or if the alternative evidence is unable to reliably demonstrate that the individual has met the relevant registration requirement.
8. In instances where exceptional circumstances can be substantiated but the alternative evidence does not satisfy the Registrar that the requirement has been met, the individual may be requested to provide additional information or evidence as directed by the Registrar.
9. In all cases, alternative documentation must allow for a meaningful assessment of the individual's information.



Alternative Documentation Checklist

This checklist is designed to help individuals ensure they have completed all necessary steps when making an alternative documentation request.

Step 1: Confirm Eligibility for Alternative Documentation

- Review the circumstances for an alternative documentation request to determine eligibility (e.g. lost or destroyed documents for reasons beyond control or institution closure).
- Ensure reasonable efforts have been made to obtain standard documentation before proceeding.

Step 2: Complete the [Alternative Documentation Request Form](#)

- Complete the Alternative Documentation Request Form.
- Clearly state the reason documents cannot be provided.
- Provide necessary details of the missing document(s).

Step 3: Gather Supporting Information

- Gather proof of attempts to obtain documents (if applicable), this can include but is not limited to:
 - copies of emails or letters sent to the issuing institution; and/or
 - evidence of institutional closure (e.g. news articles, government statements).
- Collect alternative evidence (as applicable)
 - sworn statements or notarized affidavits;
 - government correspondence or government-issued documents; and/or
 - other evidence as outlined in this policy.
- Write personal statement
 - a brief statement explaining the circumstances preventing access to documents.

Step 4: Submit the Request

- Ensure all documents are translated in accordance with the OAA's document translation requirements (if applicable).
- Submit the completed request form and supporting documents to officeoftheregistrar@oaa.on.ca.

Step 5: Next Steps After Submission

- Receive confirmation of receipt of alternative documentation request form within 10 business days.
- Respond to any additional requests for information within the given time.
- Once the OAA is in receipt of all requested information, await the review decision within 30 business days.



Submission to the Fairness Commissioner

This policy regarding reasonable alternatives to required documentation shall be submitted to the Office of the Fairness Commissioner (OFC) for review. Whenever there is a change in circumstances that may affect the policy, the OAA shall consult with the OFC when considering updates to determine whether the changes are material enough to warrant a formal submission for review and approval.

Before implementing a policy or updated policy, the OAA shall respond to any input from the Fairness Commissioner regarding the policy or updated policy and, if the regulations so provide, obtain the Fairness Commissioner's approval of the policy or updated policy or implement the changes to the policy or updated policy required by the Fairness Commissioner.

The OAA will conduct periodic reviews of this policy in accordance with the OAA's policy review procedures.

This policy will be publicly accessible on the OAA Website.

Definitions

"Affidavit" means a written statement of fact that is sworn under oath or affirmed to be true. An affidavit must be signed before an individual who is authorized to administer oaths.

"Certified Translator" means an individual who is certified to provide translation services through a professional organization.

"Certified Copy" means a photocopied document that has been certified and signed by a notary/commissioner of oaths to verify that the document is a true copy of the original document.

"Commissioner of Oaths" means an individual who is qualified and authorized to certify the oath of another individual. A commissioner can take and receive affidavits, declarations, and affirmations within the province in which they are authorized.

"Notarized" means to have an appointed and authorized individual (i.e. a notary public) witness the signing of a document. The document must be signed and stamped to certify that the notary has verified the parties' identities and witnessed the required signatures.

