



Ted Wilson,
Architect
President of OAA

UNDERSTANDING THE ROLE AND SCOPE OF THE OAA'S LICENSED TECHNOLOGISTS

Earlier this year, changes to the Province's [Architects Act](#) and [Regulation 27](#) enabled a new member type for the Ontario Association of Architects (OAA): the [Licensed Technologist](#). These holders of an OAA limited licence can practise architecture, subject to terms, conditions and limitations. They do not require a Building Code Identification Number (BCIN).

In this short article, I want to provide an overview of what these individuals can do and offer resources for building officials looking to learn more.

BACKGROUND ON LIMITED LICENCES

Effective January 1, 2025, the *Architects Act* and its regulation were amended to establish a limited licence class with the title "Licensed Technologist." The scope of practice is set out in Section 32.1 of *Regulation 27*:

32.1 (1) Every limited licence is subject to the following terms and conditions:

1. The holder of the limited licence will engage in the practice of architecture with respect only to the preparation or provision of a design for the construction, enlargement or alteration of a building that,

i. is not more than three storeys and not more than 600 square metres in gross area as constructed, enlarged or altered, and is used or intended for one or more of

A. residential occupancy,

B. business occupancy,

C. personal services occupancy,

D. mercantile occupancy,

E. industrial occupancy, or

F. assembly occupancy, but only with respect to occupancy for the consumption of food or drink in a restaurant intended to accommodate not more than 100 people,

ii. is used or intended for residential occupancy, contains one dwelling unit or two attached dwelling units, and, as constructed, enlarged or altered, is not more than four storeys, or

iii. is used or intended for residential occupancy, contains three or more attached dwelling units, and, as constructed, enlarged or altered, is not more than four storeys and 600 square metres in building area.

2. The holder of the limited licence may only use the titles "Licensed Technologist" and "technologue agréé".

3. The holder of the limited licence must comply with the Act and the regulations. O. Reg. 521/24, s. 10.

(2) Expressions used in paragraph 1 of subsection (1) have the same meaning as in section 11 of the Act.

(3) For greater certainty, paragraph 1 of subsection (1) does not apply with respect to anything permitted under subsection 11 (3) or (5) of the Act.

This limited licence class was approved by the legislature, supported by the Ministry of the Attorney General in 2024 and is not subject to any court order.

LICENSED TECHNOLOGISTS' SCOPE OF PRACTICE

As is the case for Architects who hold a licence with the OAA, those Licensed Technologists with a limited licence are regulated by the Association through provincial statute and do not require BCIN certification. In addition to the exceptions in Section 11(3) of the Act which describes buildings for which a licence or limited licence and certificate of practice (CoP) is not required, they may practise architecture for buildings within a scope that meets specific criteria as outlined above in the excerpt from the regulations.

In oversimplified terms, [Licensed Technologists with a certificate of practice](#) can offer architectural services for buildings with a maximum of three storeys and a gross area of no more than 600 square metres for residential, business, personal services, mercantile, agricultural or industrial occupancies and restaurants designed to accommodate not more than 100 persons consuming food or drink.

For single and duplex residential, Licensed Technologists can design one or two attached dwelling units up to four storeys, with no gross area restriction. For multi-unit residential, the limit is three or more attached dwelling units up to four storeys and a maximum of 600 square metres in building area.

Licensed Technologists must comply with all provisions of the *Architects Act* and its regulations. To be clear, these limited licence holders are members of the OAA and are subject to complaints and discipline processes, the mandatory Continuing Education Program and other facets of Association membership. In fact, at the time of this writing, Council elections are underway that include bringing a Licensed Technologist on to the OAA's board of directors to better serve the public interest. Similarly, applicants for a CoP must be a Licensed Technologist in good standing with the OAA, hold the mandatory professional liability insurance and comply with applicable regulations.

This new limited licence class represents a measured approach to expanding access to architectural services for the public while maintaining professional standards. Building officials play a key role in the proper implementation of this system by understanding the scope, verifying credentials through appropriate channels and treating valid Licensed Technologist submissions with the same professional consideration as other architectural documents.

BUILDING OFFICIALS AND LICENSED TECHNOLOGIST SUBMISSIONS

Building officials should treat submissions from Licensed Technologists as legitimate architectural documents, provided the projects fall in the prescribed scope. For projects within the terms and conditions set out earlier in this article, a limited licence holder's professional seal and signature carry the same legal weight as other professional architectural submissions, with the Licensed Technologist assuming full professional responsibility for their work.

For projects exceeding the Licensed Technologist scope, an Architect must provide the architectural services. Building officials should verify that project parameters align with the Licensed Technologist's authorized scope before accepting submissions. When questions arise about scope compliance, officials can reference the specific terms and conditions outlined in [Regulation 27](#) or contact the OAA via the [Office of the Registrar](#) or the free [Practice Hotline](#).

Submissions from Licensed Technologists follow the same professional standards as other architectural submissions, including properly sealed drawings, technical documentation, and professional letters when required. All submitted drawings or documents that govern the construction, alteration or enlargement of a building must clearly indicate the Licensed Technologist's name, licence number and professional seal.

It is important to note that a key distinction exists between the OAA's Licensed Technologists and Professional Engineers Ontario (PEO) limited licences. PEO's limited licence holders must declare on permit drawings the specific scope that their licence permits them to design, with restrictions varying by individual licence. In contrast, OAA's Licensed Technologists operate under a standardized scope of work that applies uniformly to all holders of this limited licence class. This standardization simplifies the review process for building officials, as the scope remains consistent across all Licensed Technologist submissions within the defined building parameters.

The OAA provides comprehensive resources for understanding Licensed Technologists and their practice scope. For example, the ["Becoming a Licensed Technologist"](#) webpage outlines the path to earning a limited licence (which includes holding status as a Student Technologist and Intern Technologist along the way), while the ["When Do You Need a Licensed Technologist?"](#) page helps determine project suitability for members of the public. Additionally, the ["Professional Scopes"](#) publication, which I have previously highlighted to building officials, provides detailed information about the various professional licence types and their applications.

If you are looking to verify the limited licence or certificate of practice status for a Licensed Technologist or a limited licence CoP, you can do so through the [OAA Directory](#). As mentioned, you can also contact the Office of the Registrar for any additional clarification on the limited licence class or questions on the practise parameters for Licensed Technologists. Having an accurate understanding of these distinctions is essential for effective project oversight, regulatory compliance and the continued protection of the public interest, including safety, in Ontario's built environment.

Ted Wilson is President of the governing Council of the Ontario Association of Architects (OAA). An Architect, he is based in Sudbury, where he currently serves as master lecturer at the McEwen School of Architecture.