The Chartered Institute of Management Accountants Canada Inc.
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18 November 2021

Submission to the Standing Committee on Social Policy to consider Bill 27, An Act to amend various statutes with respect to employment and labour and other matters.

Dear Standing Committee on Social Policy:

On behalf of the Chartered Institute of Management Accountants, Canada Inc. (CIMA) and the American Institute of Certified Public Accountants, I thank you for the opportunity to make a submission on Bill 27, *Working for Workers Act, 2021*.

We recognize and welcome the Minister's determination to support Ontario workers with the measures contained in Bill 27*, Working for Workers Act, 2021*. If this proposed legislation is passed, the amendments made to the *Fair Access to Regulated Professionals and Compulsory Trades Act, 2006 (FARPACTA)* would serve as a powerful step to addressing the barriers internationally trained individuals often face when seeking to access work in their trained profession in Ontario.

We understand that these amendments should expedite a newcomer's transition into the workforce, support employers who are seeking to access pools of talent, and fill labour market needs in regulated professions. However, if an overarching goal of this new legislation is to remove barriers foreign-trained professionals experience when trying to access work in their chosen field, we believe there is more work to be done.

This submission focuses on a solution that can encourage greater business investment, strengthen innovation, and fill the gaps seen in many of Ontario's largest companies who struggle to recruit working professionals with leadership experience in business strategy.

CIMA and the CGMA Designation

CIMA, founded in 1919, is the world's leading and largest professional body of management accountants. Its members and students operate in 179 countries, working at the heart of business. CIMA members and students work in industry, commerce, the public sector, and not-for-profit organizations. In 2012, through a joint venture, CIMA and the American Institute of Certified Public Accountants (AICPA) created the CGMA designation to recognize a unique group of management accountants who have reached an advanced proficiency in finance, operations, strategy, and management.

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The CGMA designation is built on extensive global research to maintain the highest relevance with employers and develop the competencies most in demand. GCMA designation holders qualify through rigorous education, exam, and experience requirements. They must commit to lifelong education and adhere to a stringent code of ethical conduct. Businesses, governments, and nonprofits around the world trust CGMA designation holders to guide critical decisions that drive strong performance.

Critically, the CGMA designation is about management accounting – a discipline focused on business strategy, operations, and management. This is distinct from public accounting, the designations for which are overseen by Chartered Professional Accountants Ontario (CPAO).

CGMA and Red Tape

In Canada, CGMA designation holders are unfortunately stifled by red tape that threatens them with prosecution for transparently describing their skills. In Ontario, the prior provincial government passed legislation in 2017 limiting the use of accounting-related credentials working professionals who are not members of CPAO can use. Despite some of Ontario's largest companies, including Magna International, Canadian Tire, Loblaws, and governments, including the City of Toronto and the Province of Ontario, hiring CGMA designation holders to fill senior level management and analytical positions, under the *Chartered Professional Accountants of Ontario Act*, these individuals are unable to use their credential in public, on LinkedIn, or other forms of social media. These skilled working professionals, like those who are being supported through the proposed amendments to FARPACTA, are able to immigrate to Canada because of their professional designation. But once in Canada, red tape prevents them from properly using their hard-earned designation, reducing their job prospects and preventing Ontario companies from successfully recruiting these skilled individuals to address labour demands in their workforce.

The provision in the *Chartered Professional Accountants of Ontario Act* limits a trained CGMA professional's ability to take on a leadership position in building a resilient economy, and harms Ontario employers as this creates difficulties recruiting individuals with these specific and in-demand skill-sets.

Changing the statute to allow for the use of the CGMA designation will benefit the Province and will allow all designation holders to publicly use their credential without the financial burden and bureaucracy of an additional membership. Appropriately, CPAO will continue to have full regulatory authority over public accounting.

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As a result, to fulfill the spirit of the amendments to FARPACTA contained in Schedule 3 of Bill 27, our recommendation to the Committee is that the *Working for Workers Act, 2021* should be amended to include an additional Schedule that amends the *Chartered Professional Accountants of Ontario Act.*

Specifically, subsections 29(2) should be amended to add the following subsection:

(2.1) Notwithstanding subsection (2), clauses 1 (a) and (b) do not apply if an individual uses a term, title, initials, designation, or description that includes the word "management" or its initial when making reference to an authentic professional accounting qualification obtained by the individual if the qualification does not authorize the individual to practise public accounting and is offered by,

(a) an authentic accounting organization for certified public accountants with which Chartered Professional Accountants of Canada (CPA Canada) had entered into a mutual recognition agreement prior to the coming into force of this subsection; or

(b) any other authentic accounting organization that offers the same qualification as an organization under clause (a).

As Ontario looks towards economic recovery, qualified immigrants will be needed for new investment and innovation. Adding the proposed Schedule to allow for the use of the CGMA designation will benefit Ontario's economic recovery and will allow all designation holders to publicly use their credential without the financial burden and bureaucracy of an additional membership (not to mention removing the stress of potential prosecution). We strongly encourage the Standing Committee to make this proposed amendment to help address Ontario's labour shortage, advance Ontario's economic recovery and allow foreign-trained workers to realize their potential.

Sincerely yours,

Keren Stephen
Chair, CIMA Canada

Martin Buckle
Immediate Past Chair, CIMA Canada