Ontario Professional Planners Institute
Institut des planificateurs professionnels de l'Ontario

GREEN PAPER:

ADVANCING SELF-REGULATION OF PROFESSIONAL PLANNERS IN ONTARIO

Introduction

For several decades now, professional planners in Ontario have been considering the desirability and possibility of becoming a fully self-regulated profession. OPPI's Strategic Plan in 2007 authorized Council to "Investigate the feasibility of regulating the planning profession through provincial legislation."

In late 2008, Council appointed members to a Professional Practice Advisory Group ("PPAG"), which met with OPPI's legal counsel as well as a government relations firm. PPAG reported to Council, which endorsed a further exploration of this issue, subject to further Council review and consultation with the members.

In the summer of 2010, PPAG members and OPPI staff held meetings with representatives of 7-8 related professions to discuss this idea. On the basis of those meetings, and its own research, meetings and discussions, PPAG has written this Green Paper for consideration and debate by the membership of OPPI. Part II of this paper is a FAQ (Frequently Asked Questions) which supplements the information in this Green Paper.

PPAG also knows, from the membership survey conducted in spring 2010, that OPPI members have a wide range of opinions on the subject of self regulation for planners. We encourage you to review this material, discuss it with your planning colleagues, and let use know if you have any further questions or comments.

OPPI – More than (just) a Professional Association

OPPI is currently a voluntary, consensual professional association in the form of a statutory corporation with special title protection for the RPP designation. It is important to remember that OPPI as a professional association is a private entity formed by members of a particular profession for the benefit of advancing commonalities in standards of practice, communications and issues common to its members. Although OPPI members have the privilege of membership, those members do not have any special rights that they can enforce against non-members. Moreover, the professional association does not have government enforced obligations to society. Rather, it has articulated, self imposed and accepted obligations within its adopted Professional Code of Conduct. As such, OPPI upholds or enforces standards in the interest of the members of OPPI. However, the OPPI Professional Code of Conduct does itself specifically and explicitly emphasize the importance of the public interest. In this way, arguably OPPI does protect society and public interest more than most other professional associations.

In contrast, a self-regulated profession has, , a regulator established by the government for the benefit of the public. The government can grant the members certain rights (to use certain titles, to perform certain "restricted acts") that non-members do not enjoy. In return, the government can impose certain duties on the regulator and the regulated members. For instance, the regulator must carefully control membership and entry to practice, so that only competent ethical individuals enjoy the right to practice.

Note that with respect to a self regulated profession the government is not itself the regulator. However, every regulator is accountable to the government, and indeed to a particular appropriate Ministry (usually a large one). The Province must remain satisfied that the regulator is complying with the legislation that grants it the powers of self-regulation, and is doing so in the public interest. For planners, the Ministry of Municipal Affairs and Housing appears to be a logical fit as a starting point for discussion about reporting arrangements with the government.

OPPI is a professional association, but under the *Ontario Professional Planners Institute Act, 1994* (a "private" act), the government granted "title protection" for the RPP designation. A non-member who uses that title can be prosecuted for a breach under the *Provincial Offences Act*. This is based, on the Province's longstanding recognition and trust that OPPI sets high standards in accepting new members and conducts membership affairs in a conscientious and diligent manner.

OPPI has long had a complaints & discipline process in place regarding its members. Not all professional associations have such processes, but all self-regulated professions do.

OPPI members often work closely with self-regulated professionals: architects, engineers, lawyers, land surveyors. Unlike those professionals, RPP's do not enjoy any 'restricted acts', being activities establishing a preserve that may be attributable in law or by implication to members of those regulated professions. Currently, apart from the title protection afforded RPP status, and subject to certain other considerations, there is legally nothing to prevent any other individual or self-regulated professionals -from doing exactly the same work that professional planners do. There is debate within the planning profession about whether non-planners have in fact encroached on the work that has traditionally been done by planners. There is also concern and debate about whether such encroachment has been or could be inappropriate and detrimental to the public interest.

As noted in the companion FAQ, professional planning is not a fully self-regulated profession in any jurisdiction of which we are aware.

Public Interest Test for Attaining Self-Regulation

Since the government grants a profession the privilege of self-regulation not for the good of members of the profession, but for the benefit of its citizens, the test that must be met to justify self-regulation is a "public interest" test. Articulation of the public interest supports the rationale for self-regulation of the planning profession and as such, it must be evident

and compelling. The articulation of public interest for self-regulation will evolve as stakeholders and the government are consulted.
Below is a "public interest" argument for the self-regulation of the planning profession in Ontario. Comments and feedback from the membership regarding this argument are invited.

The Case for Self Regulation of the Planning Profession

What is the public interest and is it in need of protection regarding land use planning in Ontario today?

The **public interest** refers to "common well-being" or "general welfare." While aiding the common well-being or general welfare is positive, there is little consensus on what constitutes the public interest. Does an action have to benefit every member of society in order to be truly in the public interest? Is any action in the public interest as long as it benefits some of the population and harms none? Or is it best expressed as the greatest possible good for the greatest possible number of individuals?

With respect to the planning profession, most planners are keenly aware that the public interest is difficult to define and assert, particularly when it comes to planning issues related to managing growth and the health of our communities because the public interest is multi-layered, atomistic, and the interests or benefits (which may be monetary or related to quality of life/culture) are valued and thus highly competed for.

Central to the estate or interest of the professional planner is the stewardship of a tangible asset, real property. A fundamental pillar of societal organization is the use, preservation, protection, stewardship, organization and goal of improvement to balance, sustain and manage the use of elements, including the land resource.

It has been said that the planner needs to "understand, analyze and influence the variety of forces-social, economic, cultural, legal, political, ecological, technological, aesthetic, and so forth –shaping the built environment".

It is often only after lengthy study and the input of many stakeholders, including other professionals, that a planner is able to form an opinion of whether a proposal is truly in the public interest. Consider further that with complex matters requiring interpretation of legislation and weighing of conflicting policies, professional planners may not share an opinion on what is in the best public interest. Challenges occur with some frequency and information is then further reviewed and debated. It is this intrinsic challenge that comes with defining the public interest related to disposition of land and other activities that planners engage in that also frames why there is a public interest in regulating planning - the planning process must work effectively if it is to find a position that supports the public interest.

Consider further that Ontario is in the midst of rebuilding and expanding critical public infrastructure and is actively shaping the long-term composition of communities across the Province. The successful implementation of this government's initiatives relies on good

planning which relies on good planners. The government understands that planning and the physical layout of our communities and neighbourhoods have long-term, or even irreversible, effects on the medical, economic and social health of our citizens, the environment and agricultural and food issues.

Can we say that self-regulation will end poor planning? One answer is "no" because politicians, not planners, are among the decision-makers and there are often influences beyond those issues that are publicly debated which impact decisions.

However, planners make recommendations to clients rooted in the best long term uses and relationships related to real property and associated variables. These clients include politicians, they, in turn, prioritize and define the public interest. Self-regulation of the planning profession will ensure that anyone who calls himself/herself a planner has met certain standards and is guided by a code of practice and ethics. Demonstrably, self-regulation should ensure that the information and recommendations being presented to developers and decision-makers collectively will be assured a higher standard and quality of contemporary best practices, educational certification, peer assessment and independent professional opinion practice.

Self-regulation will support the trust that the public attributes to planners today because the field has become complex and specialized. Many countries have respected planning associations. Unlike aspects of an association, a regulatory body's decisions and activities would of necessity be conducted in the public view and in the public interest, not in the interest solely of the client, the profession or the practitioners or any definable interest group. The regulatory body's actions would be charged to protect the public from incompetent or unethical practitioners.

A profession serves people by bringing specialized training and expertise to bear upon the issues. Lacking this training, the public cannot fully engage, understand or hope to replicate what professional planners do, in like manner to what other specialized professions assess and apply, in terms of gained and applied knowledge, expertise and perspective. The public therefore, cannot readily be expected to evaluate the appropriateness or quality of the services and recommendations. The public must trust planners to act in its best interest. Damage done by unqualified, unprepared or unethical planners can significantly harm public, environmental and economic health. Avoidance of undermining the integrity of public and private planning practitioners has value both to avoid calling into question the integrity of the professional advice and the creation of suspicion as to the role and effectiveness of planners and planning in the advisory process of real property decision making.

Land resources are limited and need to be carefully conserved and leveraged to ensure future generations continue to have choice and opportunities. Why would government want to leave the protection of the public interest in land use matters at risk? The right to practice as a planner if legislated can ensure the public interest is held paramount. Without a planner's assessment, the presentation of a proposal to a client, a Council, the OMB, or other tribunals, removes the public interest obligation to be sufficiently comprehensive, rational, and sophisticated to permit objective evaluation and

contemporaneous consideration when balanced against the evidence of others. Public concerns may be heard, but the information put forward may lack depth, analysis and support. This gives decision-makers little to consider. In the same vein, compare a layperson commenting on the correct medical treatment for internal injuries. Fully regulated professional planners must necessarily bring knowledge based on research and observation of how we build successful communities across the globe to the table. Regulated professionals must also bring an objective analysis of the tradeoffs inherent in land use decisions.

Planners require certain skills and knowledge to perform their work. Universities in Canada and across the world have recognized accredited planning degree programs at undergraduate, masters and doctorate levels. In Ontario, these programs receive financial support from the Provincial Government. Why should tax payers support these specialized programs if there is no need for planners to be accredited to undertake planning work? In a tough economic market, it is difficult for decision-makers to address decisions when faced by the fear of losing jobs, tax revenues and constituents' votes. The complexities of land regulatory matters before decision-makers, can disguise whether the public interest has not been considered as a priority thereby compromising the ability to fully understand the full impact of a decision. Ontario politicians should be able to rely on opinions provided by qualified planners. Self-regulation can weed out and prevent unqualified and unethical persons who are not acting for the long-term benefit of our communities and environment, from being able to participate in the planning of communities under the guise of the Planner title.

Some businesses are not interested in hiring Registered Professional Planners (RPP) for the very reason that a RPP must plan with the public interest as a primary concern. With the public interest a non-issue or secondary issue at best, the client's interest comes first. Relatively few issues end up before adjudicative judicial tribunals, such as the Ontario Municipal Board, to test or provide qualitative assurance for the qualification of experts. In summary, the vast majority of planning decisions could be made based on an unqualified or partial opinion.

With regulation, the speed of the planning process should increase and therefore the cost of development decrease because qualified and ethical planners would be involved with a common knowledge base and goals.

Today, if that planner is a member of OPPI, a formal complaint can be made to the Discipline Committee and action will be taken. However, if the planner is not a member there is likely little recourse beyond a civil suit; at great cost and risk to the aggrieved party. A self-regulated profession must also have a formal complaint process, not dissimilar to the OPPI process. The benefit to the public is that all practicing planners would be covered by a standardized level of oversight and accountability.

Most self-regulated professionals must undertake continuous professional learning to maintain their accreditation and competency. Continuing competency is both important and relevant. It goes without saying that the world is ever changing. The public interest must be determined in light of these changes and only by planners staying current to new practices,

legislation, research and idea development can this happen. Continuous professional learning is in the public interest and is an important component of self-regulation.
The public, reflected in both the public and private sectors, has much to gain and lose in the land-use development realm. Legislating the self-regulation of planners can best serve the public interest in the many matters affecting land use, development and preservation of real property.

Defending Against the Status Quo

Playing devil's advocate, a cautious position might be attractive and thus it is necessary for OPPI to consider a response:

"Sure, if only licensed and qualified professional planners were allowed to practice, the overall quality of planning might go up. But is the quality that bad now? Are there any real problems being caused by incompetent or unethical planners? There might be an incompetent planner on one side of an issue or application, but wouldn't there likely be a good planner on the other side? And even if they're both incompetent planners, isn't it really up to the municipal council (or whoever) to make the right decision? Similarly, even if there are good planners on both sides, the council can make its own incorrect decision – there's no self-regulation solution for that!"

A possible answer is that the "system" needs to be protected as much as the participants in it are protected. For instance, in the legal system, it is judges and juries who make the ultimate decisions, so why should the government regulate who represents parties in the courts, or how competent or ethical those representatives are? But there is in fact a restriction that only individuals who belong to the self-regulating body for lawyers and paralegals may represent clients before judges and juries (although the parties can of course represent themselves). This restriction attempts to protect those **clients** by ensuring that the lawyers are qualified etc. – but it also attempts to protect the justice system itself and **society as a whole** from the damage it would suffer if incompetent lawyers caused their clients to lose cases that they should have won, or if the public came to believe that the justice system was operated by unethical or unprofessional individuals, or too often led to unfair results. Of course, the legal profession and its members – and the planning profession and its members – will never be perfect, whether they are unregulated, self-regulated, or state-regulated. The question is "Which option will work best for the clients and society as a whole?"

What would (or would not) change? – Aspects of Self-Regulation

Independence: As noted above, a professional association, even a consensual membership corporation, is basically different from a public interest professional regulator. The basic aims can differ: promote the interest of the profession vs. promote the public interest. These two objectives could be pursued by two separate bodies. Public regulation, if it found it appropriate, could determine to ensure that no one body is placed in a conflict of interest where it might have to decide which of these interests to favour in a particular case.

However, in the past the government has recognized that it may be too expensive and impractical (at least at first) to insist on two separate bodies (examples include the Ontario Professional Foresters Association, and the Ontario Association of Architects). Since OPPI already undertakes many of the duties of a regulator, as noted below, it might especially be logical to have OPPI (or other New Entity) be both the regulator and the professional association. In the long term, a model might evolve that sees shared administrative infrastructure, but a separation between the professions advocacy arm and its regulatory/ disciplinary/education/public communication arm.

Entry to practice: OPPI, in a manner that is more like a regulating body than a professional association, sets strict standards regarding who it admits to membership. Indeed, those standards have recently been comprehensively reviewed and revised as part of the "Planning for the Future" project.

Quality Assurance (QA): It is increasingly recognized that after they are admitted to a profession, professionals have an obligation to ensure that they remain competent and stay abreast of new developments. Professional regulators use very different approaches to this quality assurance function, depending on how dangerous it would be for their members to let their competence erode (e.g., pharmacists vs. foresters; pharmacy inspections, prescription record reviews, random selection for peer review doing "standardized patient" exercises (mock interviews) vs. simple encouragement of continuing education). The trend now is that the bare minimum QA that will be imposed on a self-regulated professional is "mandatory continuous professional learning (CPL)." This is a basic and necessary feature of any mature and respected profession, and certainly a cornerstone of enhanced self-regulation. Mandatory CPL is already in place at all the other affiliates of CIP and is presumed and encouraged in the "Planning for the Future" reports. In response to an OPPI strategic plan direction mandatory CPL is currently being investigated by the Professional Practice and Development Committee, a working committee of OPPI and it is anticipated that Council and the membership will be asked to consider implementation of CPL later this year.

Standards of Practice: Again, OPPI has always had a code of ethics, a professional code of practice, and has established and published more specific "standards of practice."

Complaints & Discipline: A sophisticated and longstanding Discipline Committee provides OPPI the mechanism as to how the standards of practice are enforced. As noted above, OPPI has a functioning complaints protocol: a Discipline Committee (made up of volunteers), and a process in place to receive and handle complaints about the conduct of OPPI members. For a self-regulated profession, the process is often set up a little differently:

- The regulator can initiate an investigation even in the absence of an outside complaint (e.g., if the member has lied on an application form, etc.);
- Complaints may be considered by one body (Complaints Committee) before they can be referred (if appropriate) to another body for a hearing (Discipline Committee), so that the hearing is not tainted by any prior knowledge of the facts;
- While the sub-committee of the OPPI Discipline Committee conducts the committee's

investigations, in the context of a self-regulated profession, specialized staff are sometimes hired (full-time or freelance) to do this. This is more a function of the number and complexity of the complaints, than of the fact that the profession is self-regulated;

- In the rare case that a complaint at OPPI is referred to a discipline hearing, the complainant is expected to lead the case against the member. In the context of a self-regulated profession, the prosecution is in the interest of the public, not just the interest of the complainant, so the regulator may be charged with responsibility to lead the case, hire a lawyer to prosecute, etc.
- The regulator can investigate a member's alleged incompetence (this is usual in the health care professions, where professional incompetence could be injurious to individual health);
- The regulator can investigate a member's alleged "incapacity" (i.e., a physical or mental disability, such as a psychiatric illness or substance dependence~~,~~ that makes it dangerous to the public for the member to practice without conditions or supports). This is actually known as a "Fitness to Practice" process and is kept separate from the Complaints & Discipline process; it is even more specific to health professions. Such investigations and hearings are not punitive in nature, and are conducted as confidentially as possible, to protect the privacy of the member);

It is not clear whether there would be more complaints made against planners (and/or more discipline hearings) under a scheme of self-regulation. However, even the same volume of complaints might require an increase in resources, staff and funding, as noted above. As well, responding to ill-founded, nefarious or unsubstantiated complaints costs members time and money – and while this is true even now, it might have an impact on more members if the number of complaints were to increase.

Transparency: Since a professional association exists for the benefit of its members, it is free to decide how much information to reveal to the public about the organization itself and about its members. In fact, current privacy legislation would support the reticence of the professional association to divulge too much information.

However, if legislation grants a profession the privilege of self-regulation, that legislation will also mandate what information the regulator must publish. (And one of the most important means of publishing information is now always recognized to be the regulator's website).

The trend in professional regulation is towards increased transparency. That is, information should be made available to the public (on the "public register") unless there is some good reason to hold it back. Members' work addresses, membership status, educational qualifications, etc. are generally uncontroversial items that are included on the public register, whereas home addresses are not. Such transparency also serves a public protection purpose. If a member has been disciplined or found guilty of professional misconduct in the past, this is obviously information relevant to individuals who are considering hiring or retaining the member.

Complaints that have been received but not reviewed or screened yet would not be public information. Similarly with complaints that a screening committee had considered and

determined did not merit referral to a Discipline hearing. However, matters that the screening committee had referred to a Discipline Committee hearing might be listed on the public register, even before the Discipline hearing took place. These matters would be listed as unproven allegations, and the member would remain "presumed innocent" unless and until proven otherwise. The legislation that allows the health professions in Ontario to regulate them requires the public listing of this sort of information. Current restrictions on a member's practice are important information, for instance for prospective employers. If the restrictions result from incapacity proceedings (see above), then the fact of the incapacity would be published, but not unnecessary details about the member's health or medical condition.

Thus, from the professional's point of view, there is undeniably a decrease in privacy as part of the price of gaining self-regulated status.

Public Participation: In order to ensure that the profession is regulated in the public interest, and not just for the good of the profession itself, the governing council of the regulator and its committees generally include individuals who are not part of the profession. These public or lay members are appointed by the government, and are usually community-minded citizens or other professionals. Public representation may range from a small, token presence, up to a 50% share. (The extent of public representation is set in the self-regulation legislation, so it must be agreeable to the government, as well as to the profession itself.)

OPPI already ascribes to the philosophy of ensuring a lay citizen member on the Discipline Committee.

It is not unknown for professionals to feel that they are not truly "self-regulated" because their Council and committees include individuals who are not members of that profession. Nor does the regulator have any control over the identity and qualifications of the lay members the government appoints. However, most regulated professionals well understand that such public participation is a legitimate and reasonable method of ensuring that the profession is effectively regulated in the public interest.

Cost: If professional planning were to become fully self-regulated, as noted above either OPPI would have to be expanded or another body would have to be created to carry out the new regulatory duties. In either case, professional planners could expect to pay an increased amount in annual dues or fees. Note that if OPPI carried out both roles, presumably there would be less duplication and overlap, and the increase would be somewhat smaller. Keep in mind that as noted above OPPI already currently carries out many of the duties of a professional regulator. So the increase in costs might not be excessive. On the other hand, there might be one-time costs associated with the establishment of new processes, and the transition to a fully self-regulated profession.

PPAG Recommendations Regarding the Form of Legislation for Self Regulation

PPAG favours a public act providing for the self-regulation of the planning profession in Ontario. PPAG recommends that OPPI Council and OPPI members work with and lobby the

Ontario government to bring this about. There could be several different aspects to such legislation, and each of these is addressed below.

Enhanced Title Protection

OPPI members enjoy title protection, in that only a Full Member in good standing of OPPI can legally use the designation "Registered Professional Planner" or the acronym RPP. However, there is nothing to stop a non-member from calling themselves a "Professional Planner," and many OPPI members find this an unfortunate "loophole" in the statutorily recognized nomenclature.

(Not all protected titles include uppercase letters – see Section 10 of the *Pharmacy Act* regarding "apothecary", "druggist", "pharmacist" or "pharmaceutical chemist".)

A licensing statutory power is recommended as being the symbol of professional regulation and membership.

It is proposed that OPPI seek **enhanced** title protection for its members. Non-OPPI members will continue to look to find some way of describing what they do without offending enhanced title protection (e.g., "development consultant", "real estate expert", etc.) But the most obvious and important titles, that actually are best deserved by Full members of a regulated profession, should not be available to these non-members. Without encroaching on any other professions, it is proposed that the following might be a reasonable aim:

> "No person other than a licensed member shall use the title 'Registered Professional Planner', 'city planner', 'municipal planner', 'urban planner', 'urbanist', 'urbaniste', 'town planner', 'land use planner', 'regional planner', 'community planner', 'development planner' or 'professional planner' or any other qualifying adjective, or any name, title or abbreviation or description in any language implying or which may lead to the belief that the person is a licensed member, including the designation 'RPP'."

The phrase listed above that may be most difficult to protect is "professional planner", since it is such a generic phrase. There is no recommendation or attempt to interfere with other legitimate professional titles, such as "professional financial planner." Perhaps wording could be added to clarify that no prohibition is intended against legitimate titles of the form "professional ADJECTIVE planner."

Scope of Practice

The scope of practice of a profession is the description of the profession, its practice and boundaries, etc. A dictionary will often define "scope of practice" as "the actions and procedures the professional is legally permitted to undertake. This confuses the "scope of practice" (which may be non-exclusive) with the "restricted acts" (which are by definition exclusive to some defined professionals).

The definition of "scope of practice" may be important legally. Indeed, the breadth of a scope of practice may be particularly important to the field of professional planning, since it is such a diverse profession, with many different types of planners practicing in many different settings and specialties.

PPAG proposes that new public act legislation be supported to effect self-regulation of the planning profession and that Council should consider whether there is value to describe the "scope of practice" in the same way that "planning" is defined in the current *Ontario Professional Planners Institute Act, 1994*:

> "The practice of professional planning is the scientific, aesthetic and orderly disposition of land, resources, facilities and services, with a view to securing physical, economic and social efficiency, a sound environment, health and well-being."

Restricted Acts

PPAG has given consideration to whether public legislation should extend to include the delineation of restricted acts requiring the seal of a licensed professional planner.

This is likely to be the most contentious aspect of any self-regulation legislation for professional planners. If OPPI proposes to restrict some activities to OPPI members, it can of course expect opposition from any non-OPPI member (including members of other professional associations and self-regulated professions) who perform those activities (or want to perform them). The more acts it proposes to restrict, the more opposition it can expect.

Listed below are the "restricted acts" and the draft language that PPAG would propose for Council's consideration subject to consultation with members and other interested stakeholders:

The necessity and significance of 'restricted acts' as a matter of legislated content is a matter that should be discussed with the Institute's legal counsel as well as a continuing consideration for Council as the matter of self regulation is advanced.

A preliminary listing of possible 'restricted acts' for licensed professional planners follows:

"No person shall do any of the following unless that person is a Full Member in good standing of the Ontario Professional Planners Institute:

- Sign an Official Plan (under the *Planning Act*, ss.16(1), 17, 26(3));
- Sign an Official Plan Amendment;
- Sign a community based land use plan (under the *Far North Act*);
- Certify that an Official Plan conforms with the *Provincial Policy Statement*;

- Sign a planning justification report (e.g. s.6.1(2.1) and s.6.1(3) of the *Niagara Escarpment Planning and Development Act*);
- Sign an application for a zoning by-law amendment, where the value of the property in question exceeds ten million dollars, or where the approving body has determined that the issue is complex and that the signature of a Full Member in good standing of the Ontario Professional Planners Institute is required.

Although RPPs will be required to review, approve and sign these documents, where small municipalities are involved we contemplate that they would continue to be largely drafted and prepared by the municipality's non-planner staff.

Conclusion

PPAG believes that it is time for the planning profession to move decisively towards self-regulation in Ontario. Many details remain to be worked out, but PPAG recommends that Council pursue a request to ask the government for public act legislation enshrining the matters recommended for Council's consideration in this Green Paper.

PPAG recommends that the membership continue to be engaged and invited to participate in all practical aspects of the pursuit of self regulation.

The membership should be invited at every stage for input and feedback, and requested for its support, where appropriate.

It is PPAG's view that, on this, OPPI's 25th anniversary, an exciting milestone for the profession and the institute, it is time for an exciting transformation in the status and practice of responsible planning in the public interest.

For more information or to provide comments, please contact the Professional Practice Advisory Committee c/o Brian Brophey, Registrar & Director, Professional Standards, standards@ontarioplanners.ca