2016 Certification Framework

Phase 1 Consultation Report

Report date: June 14, 2016

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EXECUTIVE SUMMARY

BCSA has identified a lack of uniform standards and processes for certificates of qualification that it administers as causing operational inefficiencies, creating barriers in enforcing safety requirements, impeding the distribution of safety information, and challenging provision of timely data to businesses and industry about the labour market. BCSA has developed a vision of a safety system with balanced standards between regulated equipment and work, based in clear guidelines that ensure all individuals are qualified to practice, accountable for the work they perform, and understand their roles and responsibilities, and has identified related goals in the 2016 Business Plan.

BCSA engaged in a first phase of consultation on potential changes that could be made to the certification system to achieve this vision from April 7 to June 13 of 2016. Consultation was conducted through face-to-face meetings, focus groups, and polling of Technical Advisory Committee (TAC) and Safety Standards Administrators' Group (SSAG) members. Consultation took place on the following issues and proposals:

Proposal and Recommendation	% Agree/Strongly Agree	Comment Summary
Initial examinations *Recommendation: proceed*	94%	Broad support across respondents.
Periodic examinations *Recommendation: develop a more detailed proposal before proceeding*	57%	Questions on who would administer program, suggestions to administer exams only to poor performers
Renewals *Recommendation: proceed*	75%	Clear value of renewals needs to be communicated; suggestions to link renewals to ongoing education.
Ongoing education *Recommendation: develop a clear program proposal before proceeding.*	90%	Questions over costs and administration of program. Strong support for ongoing education.
Logbooks *Recommendation: develop a clear program proposal before proceeding.*	64%	Concerns over security and verifiability. Arguments that verifying credentials employer's responsibility.
Individual safety reporting *Recommendation: develop a program proposal and evaluate its potential for success before proceeding.*	47%	Concerns over administration, security, and auditing over such a program.
Endorsements *Recommendation: proceed where appropriate to field or technology.*	73%	Questions if endorsements would be applicable to all technologies. Argument that it is up to an owner/employer to determine if an individual can perform work.

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Over the course of the consultation, 19 face-to-face or focus group meetings were held with industry associations, and 33 responses to a consultation survey were received from BCSA TAC and SSAG members.

Across the issues and proposals, most respondents agreed or strongly agreed with the proposed elements of a revised certification process; however, in a number of cases, stakeholders identified a need for clarity on proposals, administration, or the value of the proposed elements. While consultation indicates that all elements may be acceptable to stakeholders, a number should be carefully evaluated before proceeding.

In general, there was strong agreement with initial examinations and periodic renewals for certificates of qualification. While ongoing education, logbooks, and periodic exams appear to have support, there are additional questions and underlying concerns about administration and program design that should be answered or addressed prior to proceeding.

INTRODUCTION

This report summarizes the consultation feedback received from Phase 1 of the consultation process in the BCSA's Certification Process project, conducted from April 7 to June 13 2016.

Proposals

BCSA created a discussion paper on certification and potential elements of a revised certification process and framework that could help address the identified issue with the current system. The discussion paper was circulated to respondents and they were asked to review it prior to responding to the online survey or participating in a focus group or in-person meeting.

It should be noted that the proposed elements in the discussion paper are not detailed proposals for reforms, but rather principles or ideas that could be incorporated in revisions.

The Issue

A lack of uniform standards and processes for certificates of qualification administered by BC Safety Authority (BCSA) results in:
- operational inefficiencies,
- creates barriers in enforcing safety requirements,
- impedes the distribution of safety information, and
- presents challenges to providing businesses and industry with timely data to manage the labour market.

Background

Under the *Safety Standards Act* (SSA), BCSA issues certificates of qualification to individuals who provide evidence of their knowledge and ability to perform regulated work, and to declare regulated work meets a technical standard.

When the SSA came into effect in 2004, it amalgamated four previously separate safety statutes and diverse safety regulations, each with distinct definitions of individuals qualified to perform or assess regulated work. Since that time, BCSA has made progressive efforts to bring aspects of these regulations into greater alignment, in order to improve safety oversigh:

- Starting 2006, negotiation began on the Trade, Investment and Labour Mobility Agreement (TILMA, now called the New West Partnership Trade Agreement). This process identified certification standards for some occupations in BC that were not aligned with other Canadian jurisdictions.
- In 2007, BCSA reviewed its certification program as part of a larger review of the safety system. One of the gaps identified was the lack of uniform certification within and among industries, highlighted by a coroner's report on the 2007 death of an elevator worker and subsequent recommendation to establish uniform certification standards for elevator mechanics.
- Further review identified gaps in a certification model for passenger ropeways, as highlighted by serious incidents, such as the 2014 Crystal Mountain deropement.

In order to enhance safety knowledge among newly certified individuals, BCSA's 2016-2018 Business Plan includes a commitment to work with licensees and certified individuals to design programs that augment their participation in, and knowledge of, the safety system.

CONSULTATION PROCESS

BCSA engaged in the first phase of a consultation process from April 7 to June 13 2016, by engaging in one-on-one meetings, interviews and focus groups with stakeholders for feedback on developing a robust certification model. The intention of the consultation discussion paper and the stakeholder meetings was to determine what features of an overall certification program are both necessary and compatible with the overarching provincial regulatory structure and risk-based approach to technical systems safety in BC.

Stakeholder input was collected, analyzed and will be used to enhance the existing certification program while providing clear guidance on what features should be incorporated into a given type of certificate of qualification. BCSA will use this framework to inform the development of future certificates of qualification, while also deciding which enhancements should be introduced to existing certificates over the long term.

The consultation that gives rise to this report took place through:

- Face-to-face or focus group meetings with 18 associations or key stakeholders
- An online survey with members of the BCSA's Technology Advisory Committees and Safety Standards Administrators' Group.

In total, the BCSA's Technology Advisory Committees and Safety Standards Administrators' Group have 83 members. 33 of those members provided responses, for a participation rate of 39.75%.

TAC and SSAG Participation	
Invited:	83
Responses:	33
Participation %:	39.75%

In addition, 19 industry groups, educational institutions, or other stakeholder groups were identified as affected populations and face-to-face and focus group meetings were scheduled with them. Responses from 18 participating groups were collected.

Affected population	
Associations, educational institutions, and others:	19 identified possible respondents
Face-to-face and focus group responses:	18 responses

Information about the survey and its results are included in an appendix to this report.

Consultation Results

Through this first phase of consultation, BCSA engaged with or received response from the following respondents:

- 1 representing consultants
- 7 representing contractors
- 9 representing educational institutions
- 3 representing engineers
- 8 representing industry associations
- 1 representing insurance agencies
- 3 representing manufacturers/distributors/suppliers
- 7 representing municipalities
- 2 representing owner/end user associations
- 2 representing owners
- 3 representing utilities

Some respondents provided feedback at face-to-face and focus group sessions and through written feedback during the consultation process.

BCSA received responses across a number of technologies:

Boilers and Pressure Vessels	Elevating Devices	Electrical	Gas	Passenger Ropeways	Not Specified
8	3	13	11	7	1

Some respondents worked in multiple technologies.

Over the course of the Phase 1 Consultations, 18 respondents representing associations, organizations, municipalities, committees, or educational institutions participated in face-to-face or focus group meetings:

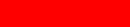| Date of Meeting	`Organization
April 7, 2016	City of Vancouver
April 7, 2016	City of Burnaby
April 15, 2016	BC Construction Association
April 18, 2016	Canadian Health Engineering Society
April 24, 2016	Building Owners and Managers Association
April 27, 2016	British Columbia Institute of Technology
April 27, 2016	Selkirk College
April 27, 2016	Selkirk College (second representative)
May 4, 2016	IBEW Local 213
May 6, 2016	British Columbia Institute of Technology
May 6, 2016	Electrical Joint Training Committee
May 6, 2016	International Union of Elevator Constructors – Local 82
May 6, 2016	Pacific Vocational College
May 6, 2016	Okanagan College
May 6, 2016	Vancouver Island University
May 9, 2016	Electrical Contractors Association of BC
May 9, 2016	Mechanical Contractors Association, BC Chapter
May 13, 2016	Thermal Environmental Comfort Association
June 13, 2016	Independent Contractors and Businesses Association

Some respondents provided feedback in both the face-to-face and focus group meetings and through the survey process.

ISSUE SCAN – CHALLENGES WITH THE EXISTING MODEL

As part of the consultation, TAC and SSAG stakeholders were asked about their view on the key challenges that the BCSA currently faces with the existing certification model and were asked which issues resonated with them and their industry. Respondents could select more than one challenge as being resonant.

In your opinion, which of the challenges resonates with you and your industry?

Response	Chart	Percentage	Count
Lack of standardization		43.8%	14
Lack of uniform knowledge		53.1%	17
Inability to effectively enforce compliance		37.5%	12
Lack of accurate labour market information		25.0%	8
Other		15.6%	5

Total responses: 32

Of the 'other' responses received,

- Four respondents identified a lack of mandatory training, renewal of certification, or continuing educational requirements, and
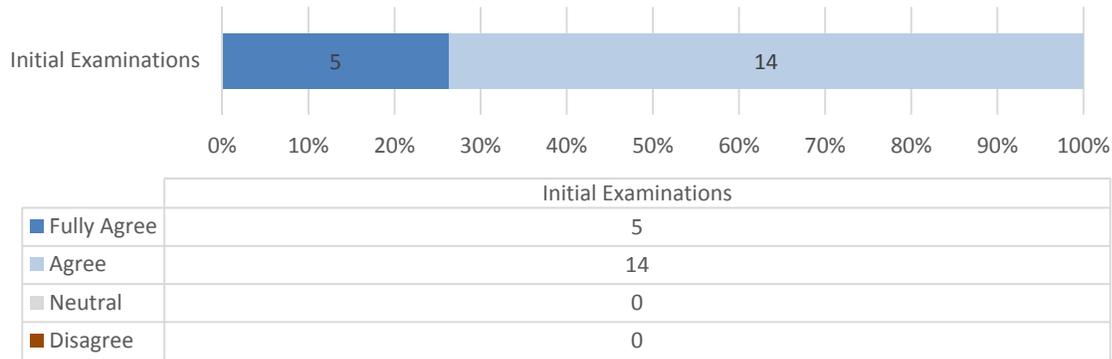- One respondent identified "de-certification of trades".

Observations

- Respondents identify a lack of uniform knowledge (53.1%) and lack of standardization (43.8%) as being challenges that they feel resonate with them personally and their industry.
- Four respondents specifically identified mandatory training, renewal of certification, or continuing educational requirements as being challenges that the BCSA faces that resonate with them.
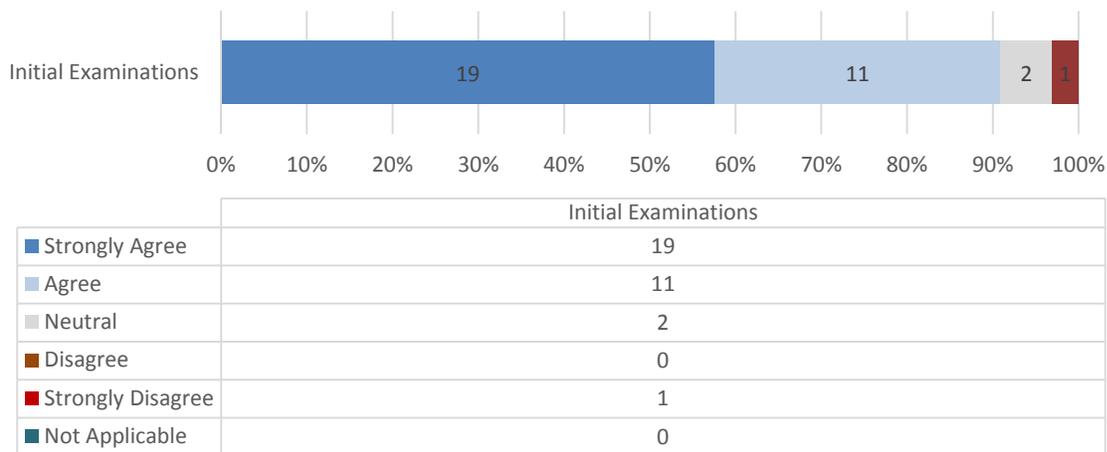
PROPOSAL 1 – INITIAL EXAMINATIONS

New certificate holders should undergo an examination prior to being issued their certificate of qualification

Face-to-face and focus group meetings (19 responses):

	Initial Examinations
■ Fully Agree	5
■ Agree	14
■ Neutral	0
■ Disagree	0

TAC and SSAG Survey (33 responses):

	Initial Examinations
■ Strongly Agree	19
■ Agree	11
■ Neutral	2
■ Disagree	0
■ Strongly Disagree	1
■ Not Applicable	0

Observations:

- The majority (90.9%) of TAC and SSAG respondents agreed or strongly agreed with initial examinations.
- In face-to-face and focus group meetings, 100% of participants indicated support or full support of initial examinations.
- A handful of suggestions were provided to improve the proposal, including ensuring that exams are reviewed and updated frequently, advocating for an education requirement, and advocating for online learning aids and exams to minimize costs. One respondent urged that assessment should include written and practical competencies. Others cautioned and disagreed on practical assessments due to costs and administration.

- One respondent stated disagreement with certification, with no other comments. One respondent agreed that new certificate holders should have examinations, but not inter-provincial applicants who hold that certification elsewhere.

Consultation recommendation: Proceed with including initial examinations in a revised certification framework.

Overall, stakeholders seem to be clearly in support of initial examinations prior to certificates of qualification being issued. There appears to be broad agreement that initial examinations ensure quality and specific knowledge relating to the work being performed.

Some stakeholders have raised concerns about access to learning materials and costs, advocating for the most accessible and cost-effective approaches. Other stakeholders advocate for assessing written and practical competencies.

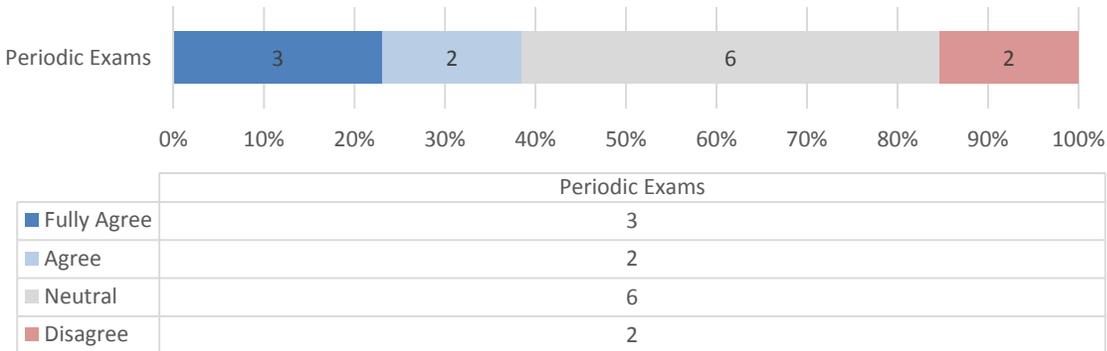**Follow-up conditions and commitments:**

- Examine the inter-provincial applicant issue to ensure that the implementation of examinations for new certificate holders would not create a significant barrier for inter-provincial applicants.
- Work to ensure that learning aids or study guides can be made available online to increase accessibility and reduce costs.
- Explore how a mix of theoretical, written, and practical assessments could be included in initial examinations.
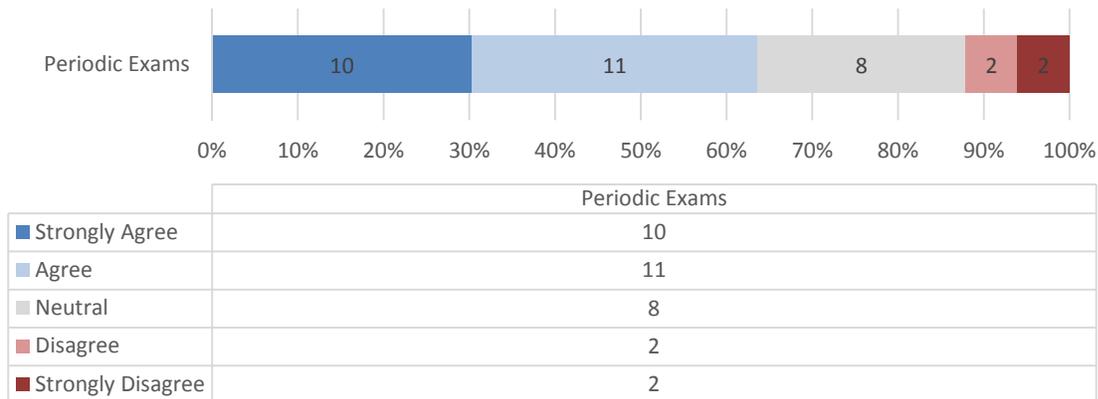
PROPOSAL 2 – PERIODIC EXAMINATIONS

Existing certificate holders should undergo periodic examination to ensure that they are staying current with industry knowledge (e.g. code or regulation changes).

46 Total Responses

Face-to-face and focus group meetings (13 responses):

	Periodic Exams
■ Fully Agree	3
■ Agree	2
■ Neutral	6
■ Disagree	2

TAC and SSAG survey (33 responses):

	Periodic Exams
■ Strongly Agree	10
■ Agree	11
■ Neutral	8
■ Disagree	2
■ Strongly Disagree	2

Observations:

- Support for periodic examinations is not as strong as initial examinations.
- A majority of TAC and SSAG respondents (64%) and 38% of face-to-face and focus group respondents supported periodic exams.
- Only one respondent from the face-to-face meetings and four of the TAC and SSAG respondents opposed the idea of periodic examinations.
- TAC and SSAG comments indicated that some respondents believe that there is a difference between knowledge of code and knowledge of current technology and methodology, while recognizing that all aspects of the trade are subject to change.
  - Some respondents questioned who would administer periodic examinations and how the costs for the periodic examinations would be covered. Unions were suggested as an alternative administrators of periodic examinations.

- Face-to-face and focus group respondents were broadly neutral or supportive with qualifications.
  - Qualifications included suggestions that periodic exams be used to assess poor performers or to assess competency as a certificate holder ages.
  - One respondent expressed concern that periodic exams would impact contractors disproportionately. One respondent saw value in periodic code exams but believed they would be hard to administer.

Consultation recommendation: Develop a more detailed proposal before proceeding.

While there is general support along with a broadly neutral response to the issue of periodic examinations, support is neither strong nor overwhelming. Stakeholders expressed concern both with the potential impacts of periodic exams or a belief that only poor performers should be expected to sit the exams.

Given stakeholder feedback, periodic exams should only be pursued cautiously and with a strong case as to why periodic exams are necessary and how they would be implemented. A modified proposal of periodic exams for certificate holders with infractions or poor performance may be worth exploring.
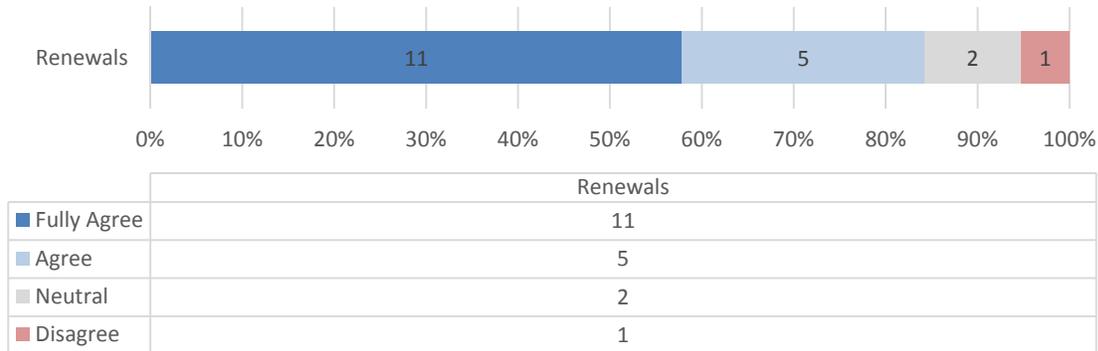
Follow-up conditions and commitments:

- Examine how contractors may be disproportionately affected in some technologies compared to others.
- Consult with stakeholders using a more detailed proposal.
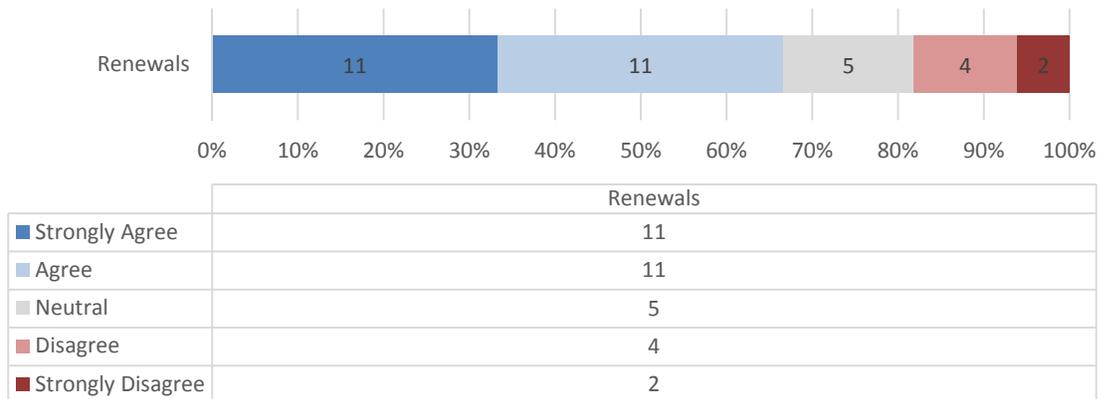
PROPOSAL 3 – RENEWALS

Certificate of Qualification should be renewed on a periodic basis (e.g. 1-, 3-, or 5-year basis).

52 Total Responses

Face-to-face and focus group meetings (19 responses):

Renewals	
■ Fully Agree	11
■ Agree	5
■ Neutral	2
■ Disagree	1

TAC and SSAG survey (33 responses):

Renewals	
■ Strongly Agree	11
■ Agree	11
■ Neutral	5
■ Disagree	4
■ Strongly Disagree	2

Observations:

- Support for renewals is higher than for periodic examinations, in both the TAC and SSAG members and the face-to-face and focus group respondents.
- While only 1 face-to-face or focus group respondents opposed renewals, 6 (18.8%) of TAC and SSAG respondents disagreed or strongly disagreed with the proposal.
- TAC and SSAG respondent comments had more questions and suggestions:
  - Two respondents stated a preference for renewals to be linked to ongoing training.
  - Two respondents suggested that different qualifications may have different renewal timelines (i.e., gas fitter more frequently than a 5th class power engineer).
  - One respondent suggested that renewals should be aligned with code changes (i.e., Canadian Electrical Code changes), and one suggested renewals every 5

years, online. One respondent suggested only if a certificate holder had left the industry for an (undefined) period of time.

- Face-to-face and focus group respondents had a higher proportion of fully agree responses, while making some comments or qualifications across all responses:
  - o Three respondents said that there needed to be a clear value proposition made before proceeding.
  - o Two respondents agreed with tracking individuals but expressed uncertainty if renewal was the way to accomplish this. One agreed in principle with re-registration (at no cost) but only if it avoids implementing a regulatory requirement.
  - o One respondent said there was value in renewal enforcing continuing professional development requirements. Another opposed renewal because it would potentially lead to additional regulatory requirements.

Consultation recommendation: Proceed with renewals in a revised certification framework.

Support for renewal of certification is broad. Many respondents reported seeing value in the proposal. A common thread amongst comments, however, is that a clear value proposition needs to be made.
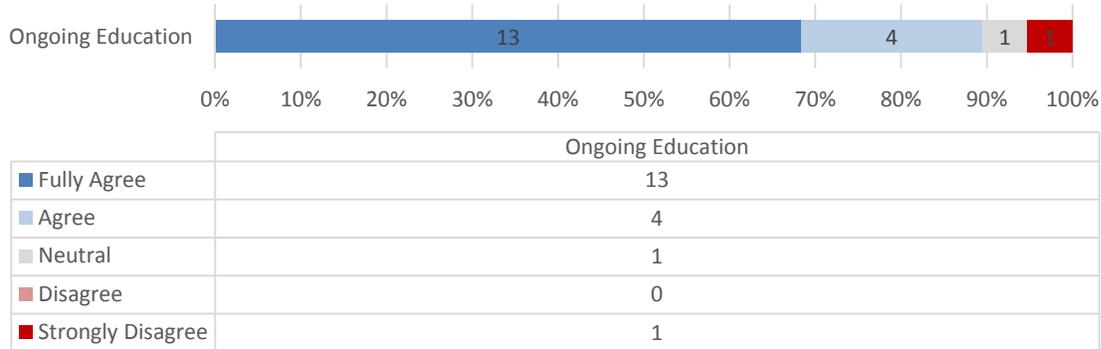
Follow-up conditions and commitments:

- Develop a clear value proposition for this proposal.
- Explore how different qualifications or technologies may have different renewal requirements.
- Examine how ongoing education could be developed, promoted, or otherwise offered to support or tie into a renewal program.
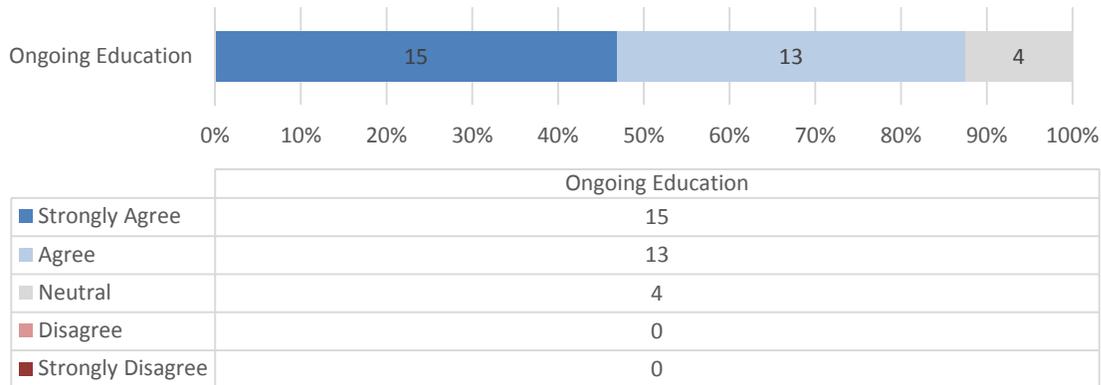
PROPOSAL 4 – ONGOING EDUCATION

Certificate of qualification holders should be required to take upgrade training on a periodic basis to keep their certificate active (e.g. training in code updates or regulation changes).

51 Total Responses

Face-to-face and focus group meetings (19 responses):

Ongoing Education

	Ongoing Education
■ Fully Agree	13
■ Agree	4
■ Neutral	1
■ Disagree	0
■ Strongly Disagree	1

TAC and SSAG survey (32 responses):

Ongoing Education

	Ongoing Education
■ Strongly Agree	15
■ Agree	13
■ Neutral	4
■ Disagree	0
■ Strongly Disagree	0

Observations:

- There is widespread support for ongoing education across both the face-to-face and focus group respondents and TAC and SSAG respondents.
- While respondents strongly support ongoing education, they do not as strongly support periodic examinations, even though discussions have suggested that exams be on the same material as covered in ongoing education.
- While there is significant support for ongoing education, comments indicated some reservations:
  - Three respondents expressed concern/reservations about who would implement or operate the ongoing education program. Two of the three suggested that ongoing education should be industry led, and one expressed a reservation that their support depended on who was administering the program.

- Two respondents expressed concerns about costs, and one respondent suggested that they agree with the proposal if ongoing education was voluntary but would be neutral if it was mandatory.
- One respondent fully agreed, arguing that technology and practice change too quickly for tradespeople to keep up, and that ongoing education would help this.
- Two respondents suggested that ongoing education should cover technology changes and changing industry practices.
- One respondent suggested that email bulletins of code changes to contractors would suffice.
- Two respondents stated that ongoing education would be good for new and emerging technologies.
- Some comments expressed support of linking ongoing education to renewals.
- One respondent fully disagreed with ongoing education, stating it was best left up to employers to provide on a voluntary basis.

Consultation recommendation: Develop a clear program proposal before proceeding.

While there appears to be significant support for ongoing education, a number of respondents stated that their support hinged on a clear picture of a proposed program and who would operate or administer it. This needs to be clearly defined before ongoing education is pursued.
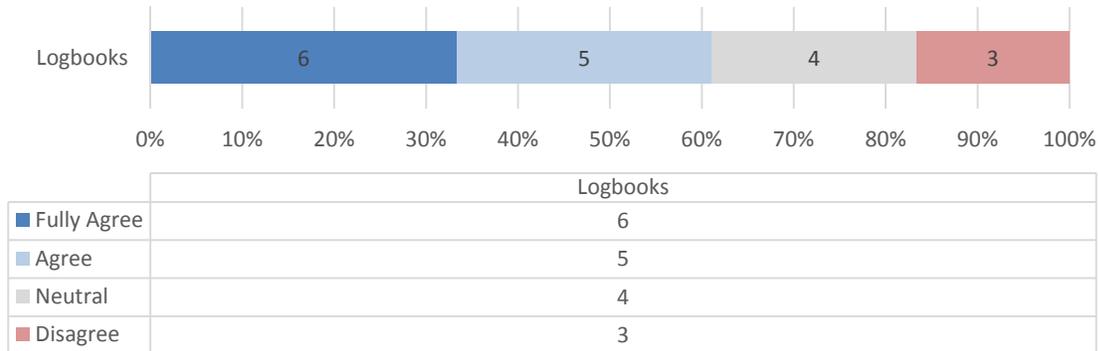
Follow-up conditions and commitments:

- Develop a clear program proposal before proceeding.
- Explore how code, new technology, and industry practice could be included in an ongoing education program.
- Work to develop a clear picture of a cost structure that would not create significant barriers.
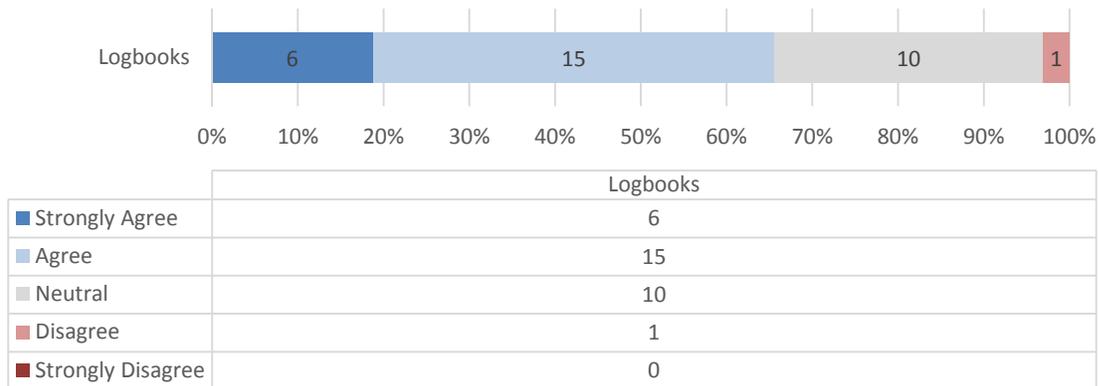
PROPOSAL 5 – LOGBOOKS

Certificate holders should have a logbook that demonstrates what educational training they have received and what types of equipment that they have safely worked on.

50 Total Responses

Face-to-face and focus group meetings (18 responses):

	Logbooks
■ Fully Agree	6
■ Agree	5
■ Neutral	4
■ Disagree	3

TAC and SSAG survey (32 responses):

	Logbooks
■ Strongly Agree	6
■ Agree	15
■ Neutral	10
■ Disagree	1
■ Strongly Disagree	0

Observations:

- Support for the proposal of a logbook is mixed.
- Many comments expressed concern about the security and verifiability of a logbook program. Some expressed concern over risks of fraud.
- Some respondents felt that a logbook was not applicable to their industry, or that this kind of tracking is an employer's responsibility. One respondent noted that some unions already have a logbook program.

Consultation recommendation: develop a clear program proposal before proceeding.

While there is mixed support for a logbook program, stakeholders expressed concern about the administration of such an initiative. Some stakeholders expressed concern about security and verifiability. Clearly describing the program, its administration, and its verifiability is necessary before proceeding.

**Follow-up conditions and commitments:**
- Examine how a logbook program could be kept secure and verifiable.
- Explore whether an online logbook program, administered by BCSA, could be used as an alternative option.
- Provide stakeholders with a clear definition of what a logbook is and potential examples.

PROPOSAL 6 – INDIVIDUAL SAFETY REPORTING

There is value in having individual safety performance reporting on a certificate holder (e.g. types of jobs that they successfully complete vs. those that fail, and/or types of non-compliances commonly cited against an individual).
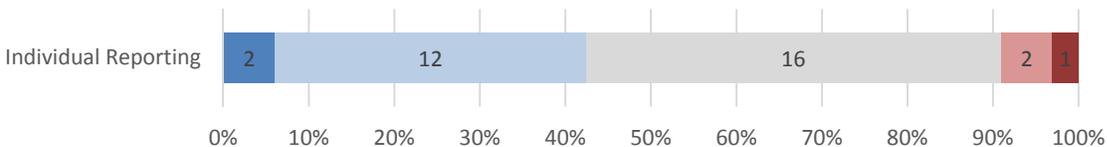
52 Total Responses:

Face-to-face and focus group meetings (19 responses):
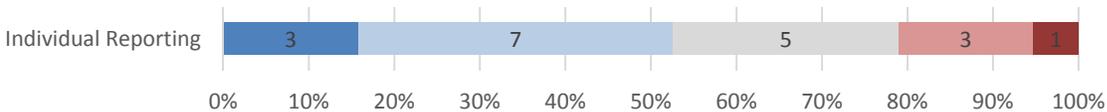
	Individual Reporting
■ Fully Agree	3
■ Agree	7
■ Neutral	5
■ Disagree	3
■ Fully Disagree	1

TAC and SSAG survey (33 responses):

	Individual Reporting
■ Strongly Agree	2
■ Agree	12
■ Neutral	16
■ Disagree	2
■ Strongly Disagree	1

Observations:

- Response to this proposal is mixed. Less than 50% of TAC and SSAG members report support of individual reporting, while a slim majority of respondents from face-to-face and focus group respondents agree or fully agree with the proposal.
- In comments, similar concerns to those for logbooks were raised around administration of an individual reporting system, who would administer it, and how reporting and auditing would be conducted. A number of respondents believed that this was the responsibility of the contractor.
- While some respondents saw potential benefits in policing industry, they also saw a need for increased inspections and enforcement. A respondent raised concerns with inter-jurisdictional issues. Others felt this proposal would be unwieldy.

Consultation recommendation: Develop a full program proposal and evaluate its potential for success before proceeding.

While there is some support amongst stakeholders who identify the potential for benefits from individual safety reporting, the concerns and questions from stakeholders about administration, enforcement, and verification should be addressed before proceeding.

**Follow-up conditions and commitments:**
- Develop a program proposal that includes some consideration on how an individual reporting system would be administered.
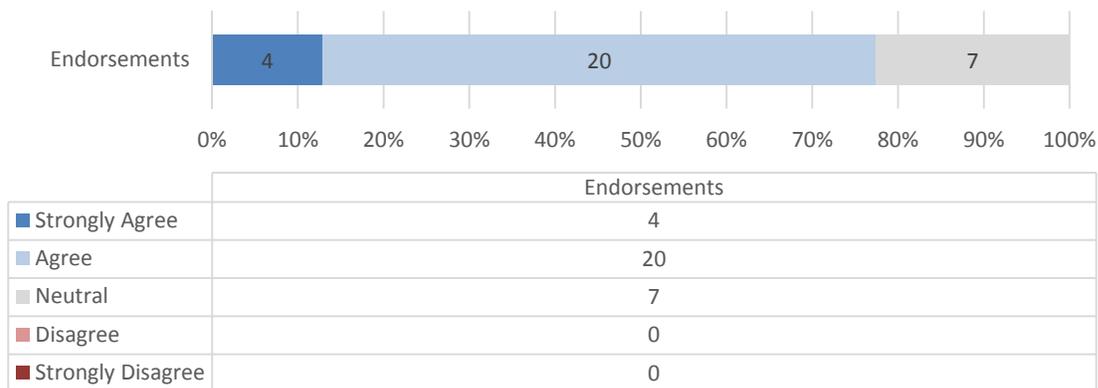
PROPOSAL 7 – ENDORSEMENTS

BCSA's certification model should complement its core certificate program by using endorsements, which are additional tasks or specialty areas that can be added to a pre-existing certificate without having to complete an entirely separate training course.

44 Total Responses:

Face-to-face and focus group meetings (13 responses):

	Endorsements
■ Fully Agree	2
■ Agree	6
■ Neutral	4
■ Disagree	1
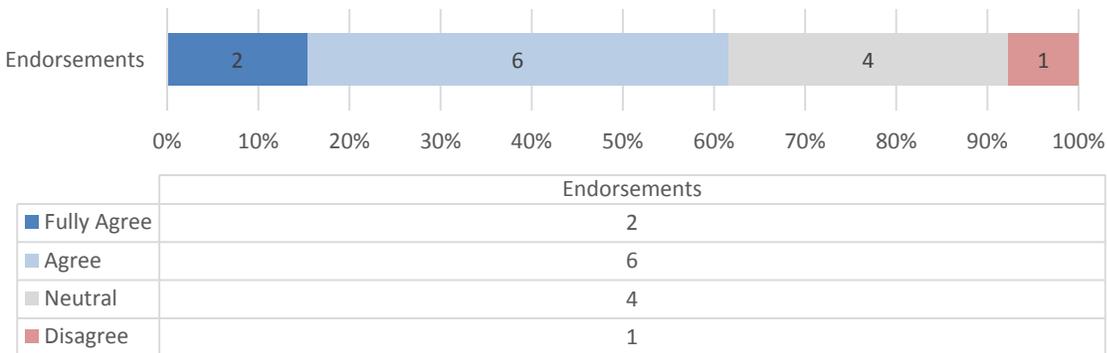
TAC and SSAG survey (31 responses):

	Endorsements
■ Strongly Agree	4
■ Agree	20
■ Neutral	7
■ Disagree	0
■ Strongly Disagree	0

Observations:

- Most respondents agreed with this proposal, with a handful fully or strongly agreeing.
- A respondent opposed the proposal, arguing that it is up to a plant owner to determine if an individual can perform work, regardless of what an endorsement may indicate, another said it was up to contractors to qualify the people they employ.
- Some respondents indicated in comments concern if endorsements would be applicable to all fields or technologies.
- One respondent suggested a union could oversee endorsements.

Consultation recommendation: Proceed in fields or technologies where endorsements are appropriate.

While a majority of stakeholders saw value in endorsements, and as one respondent put it, "the industry is moving this way," many raised concerns over whether or not endorsements would be applicable to all or certain fields or technologies. If this proposal is pursued, we should ensure that it is done where endorsements are appropriate.

Follow-up conditions and commitments:
- Examine cases where endorsements may or may not be appropriate.
- Work with associations to understand and plan for the interface between plant owners, contractors, and tradespeople to clarify who is responsible for checking, verifying, and assuring endorsements.

VALUE OF CERTIFICATION

As part of the consultation with TAC and SSAG members, BCSA asked respondents to identify the value that certification brings to their industry. Some of the most common responses included:

- Ensuring competency
- Creating consistency
- Promoting and protecting public safety
- Recognizing experience
- Increasing compliance
- Demonstrating qualifications

Some respondents did not see significant value in certification, suggesting that in at least one incident, responsible staff would likely have been certified had a certification program been in place at the time.

A number of respondents suggested that the value of certification could be enhanced by periodic examinations, ongoing education, or renewal of certifications. Some respondents suggested that the value could be enhanced, or in one case, replaced by finding unpermitted work and increasing enforcement. One respondent cautioned against certification, suggesting it may create over-regulation of industries.

COMPARABLE CERTIFICATION PROGRAMS

We asked respondents to identify comparable certification programs that BCSA should consider in its own program review. Respondents identified:

- LNG industry
- Québec's regulatory system in general
- Association of Professional Engineers of BC
- BCWWA – Certified Back-flow Assembly Tester Program
- Lineman, U/G cable splicer, metering technician
- Building Officials Association of BC and their continuing education program
- Electrical and gas
- Elevating Devices Mechanic program
- Crane Safe BC for crane operators

OVERALL COMMENTS

Respondent were provided an opportunity to give overall comments about the consultation and any other ideas they had. A summary of responses is below.

- Respondents expressed a desire to see increased inspection and enforcement from the BCSA, and higher numbers of inspectors.
- A number of respondents expressed support for the idea of certification review, with some stating that they believed this would lead to increased public safety.
- Some respondents expressed concern that while certification needs to be reviewed and improved, it should not create barriers for new tradespeople.
- One respondent praised the consultation process.
- One respondent expressed a concern over perceived lack of consistency from safety officers during inspections, but felt that the safety system is functioning well and that safety is improving.

CONCLUSION

Based on the input received, Stakeholder Engagement Programs makes the following recommendations:

Proposal	Recommendation	Conditions and commitments
Proposal 1: Initial exams	Proceed with proposal	• Examine the inter-provincial applicant issue to ensure that the implementation of examinations for new certificate holders would not create a significant barrier for inter-provincial applicants. • Work to ensure that learning aids or study guides can be made available online to increase accessibility and reduce costs. • Explore how a mix of theoretical, written, and practical assessments could be included in initial examinations.
Proposal 2: Periodic exams	Develop a more detailed proposal before proceeding	• Examine how contractors may be disproportionately affected in some technologies compared to others. • Consult with stakeholders using a more detailed proposal.
Proposal 3: Renewals	Proceed with a clear value proposition	• Develop a clear value proposition for this proposal. • Explore how different qualifications or technologies may have different renewal requirements. • Examine how ongoing education could be developed, promoted, or otherwise offered to support or tie into a renewal program.
Proposal 4: Ongoing education	Develop a more detailed proposal before proceeding	• Develop a clear program proposal before proceeding. • Explore how code, new technology, and industry practice could be included in an ongoing education program.

		• Work to develop a clear picture of a cost structure that would not create significant barriers.
Proposal 5: Logbooks	Develop a more detailed proposal before proceeding	• Examine how a logbook program could be kept secure and verifiable. • Explore whether an online logbook program, administered by BCSA, could be used as an alternative option. • Provide stakeholders with a clear definition of what a logbook is and potential examples.
Proposal 6: Individual safety reporting	Develop a more detailed proposal before proceeding	• Develop a program proposal that includes some consideration on how an individual reporting system would be administered.
Proposal 7: Endorsements	Proceed where appropriate	• Examine cases where endorsements may or may not be appropriate. • Work with associations to understand and plan for the interface between plant owners, contractors, and tradespeople to clarify who is responsible for checking, verifying, and assuring endorsements.