



International Association of Certified Home Inspectors

**Executive Offices:
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Ministry of Consumer Services
Policy Branch
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3
Attention: Ben Valido, Project Manager

RE: Proposal No. 13-MCS013

January 27, 2014

Dear Mr. Valido,

The International Association of Certified Home Inspectors, InterNACHI, is particularly suited to providing responses regarding the above-reference proposal for two reasons. First, we've had considerable experience with home inspector licensing in the United States and in Alberta. Second, we are the largest inspection association in the world, including Canada, and especially in Ontario. As such, we appreciate the opportunity to provide our feedback with regard to the proposed legislation, and we look forward to engaging in constructive dialogue in the near future.

Our responses below are listed per the numbered items beginning on page 9 in the chapter titled "Home Inspector Panel Recommendations" from "A Closer Look: Qualifying Ontario's Home Inspectors."

One should not infer that InterNACHI's use of the term "Agree" means that we support the recommendation but, rather, that we don't strongly disagree with it.

1. Agree.
2. Agree.
 - a. Agree.
 - b. Mostly agree. However, the definition should be limited to four or fewer residential dwellings.
 - c. Regarding the definition of a home inspection:
 - i. Agree.
 - ii. Disagree. The CSA has not released a standard. The standard that the CSA releases may be unsuitable. For example, in the U.S., CSA's sister company ASTM released an atrocious SOP for commercial properties, which forced InterNACHI to develop a suitable one for the industry. See www.nachi.org/comsop.htm
3. Agree.
 - a. Disagree. See response in 2.c.ii.
 - b. Agree.

4. Agree.
 - a. Disagree. The requirement of separate contracts for each service above and beyond a general home inspection would be too burdensome.
 - b. Agree.
5. Agree.
6. Regarding entry to practice requirements:
 - a. Agree.
 - b. Disagree. This has been attempted numerous times before and has failed because it is too expensive to implement, and grading by a likely future competitor is too subjective.
 - c. Disagree. InterNACHI believes this recommendation is a typo and that the panel meant to say, "Meeting established educational requirements." It would be impossible for someone to enter the inspection profession if he/she was required to find a licensed home inspector (likely a future competitor) to agree to mentor them. Furthermore, the Entry to Practice section (as currently written) does not include educational requirements. A correction of the typo as suggested by InterNACHI would result in InterNACHI's comment to change to "Agree."
7. Disagree. No regulatory body can accomplish the impossible. Every home inspector has to have his/her first client. There is no way around this.
8. Disagree. It is irresponsible to license inspectors who haven't completed any inspection-related courses. To do so would be a first in our industry and would harm consumers by tricking them into believing that a licensed home inspector has completed coursework similar to that required for other professionals. Robust inspection courses are readily available. For example, InterNACHI members have free (no financial deterrent to improve competency) and unlimited access to over 100 advanced inspection-related courses that have been awarded over 1,200 governmental accreditations and approvals. See www.nachi.org/education.htm To release into the community uneducated inspectors to compete with InterNACHI members using the exact same government-issued credential (license) would confuse consumers by tricking them into believing that all home inspectors are equally educated. This would ultimately harm consumers.
9. Agree. Furthermore, the CANADA CIPC Authorization for Release of Information form used by the Master Inspector Certification Board permits the background checks to be limited to criminal records and to not include information such as credit reports and driving history. See www.certifiedmasterinspector.org
10. Agree. This assumes that the panel means to say that there should be one title for licensed home inspectors. There are other titles for professional designations in Canada, such as *Certified Master Inspector (CMI)*, which has been awarded a Registered Trademark in Canada. See <http://certifiedmasterinspector.org/...tor-trademark/>
11. Agree.
12. Agree. However, this requirement should not apply to inspection vehicles so as to protect consumers' confidentiality.
13. Agree.
 - a. Disagree. The regulatory body should approve inspection courses. This is a common practice in both the U.S. and Canada. See right column of www.nachi.org/education.htm
 - b. Agree.
 - c. Regarding courses and activities:
 - i. Agree.
 - ii. Agree.

14. Agree.
15. Agree.
16. Agree.
17. Agree. For example, InterNACHI operates a free online library for both inspectors and consumers that includes hundreds of inspection-related articles. See www.nachi.org/articles.htm These articles are also made available in Spanish and French.
18. Agree.
 - a. Agree.
 - b. Agree.
19. Agree.
20. Agree.
 - a. Agree.
21. Agree.
22. Agree.
23. Agree.
24. Agree.
25. Agree.
26. Agree.
 - a. Agree.
 - b. Agree.
 - c. Disagree. This requirement is not strong enough. InterNACHI recommends that language be copied from InterNACHI's Code of Ethics, item #7 a. and b. See http://www.nachi.org/code_of_ethics.htm
27. Agree.
 - a. Agree.
 - b. Agree.
 - c. Agree.
 - d. Agree.
28. Agree.
 - a. Agree.
 - b. Agree.
 - c. Agree.
29. Agree.
30. Agree.
31. Agree.
32. Agree.
33. Agree.
34. Agree.
35. Agree. Grandfathering should be modeled similarly to Alberta. Alberta grandfathered all Certified Master Inspectors (CMIs)®. Certified Master Inspectors® are undisputedly the best of the best in the inspection industry and, as was true in Alberta, Certified Master Inspectors® will provide a smooth transition in Ontario while licensing is being adopted.
 - a. Agree.
 - b. Agree.
 - c. Agree.
 - d. Agree.

To sum up:

InterNACHI strongly urges the Government of Ontario to consider grandfathering Certified Master Inspectors® as part of its licensing process, as was successfully done in Alberta. This smooth transition allowed the highest-qualified inspectors in the inspection industry to conduct business and offer their services to consumers seamlessly during the process of licensing, and we believe the same will hold true for Ontario.

InterNACHI also advocates the training and education of home inspectors by providing hundreds of affordable online courses, written by industry experts, and accredited by states and regulatory agencies throughout North America. Online education allows inspectors to get the training they need at their own pace, without the added inconvenience of travel time, and the financial burden of taking time away from work.

InterNACHI provides many benefits and resources for professional home inspectors. It promotes the camaraderie of fellow professionals who support each other through the exchange of practical insights and experiences. And it leads the charge for upholding professional standards for the benefit of both the home inspector and the consumer, which is why I strongly urge you to reconsider your licensing requirements with regard to education.

Thank you for giving me the opportunity to provide input on this vital issue.

Sincerely,

Nick Gromicko, Founder
InterNACHI

[Comments previously submitted via email on January 27, 2014]

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