

# Please don't ask Office of the Registrar staff to give an opinion as to what a committee might say

The Office of the Registrar staff really do want to be helpful, but please don't ask Office of the Registrar staff to give an opinion as to what a committee might say. There are a number of reasons why this is so.

In Ontario and other provinces, the model for professional regulation is *self-regulation*. This means that important decisions about the profession and professionals are made by members of the profession. With respect to regulatory matters, there are generally two kinds of committees: (1) policy and oversight committees and (2) adjudicative committees. Adjudicative committees make various decisions about members. These decisions are made by applying frameworks established by the Board or other policy committees. At HRP, the adjudicative committees are the Certification Sub-Committee, the Recertification Sub-Committee, the Educational Standards Sub-Committee, the Complaints, Investigations, and Discipline Committee, and the Appeals Committee.

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| Certification Sub-Committee                          | Makes decisions about the appropriateness of experience in the context of the alternate route and validation of experience processes    |
| Recertification Sub-Committee                        | Makes decisions about the appropriateness of recertification log entries submitted for recertification                                  |
| Educational Standards Sub-Committee                  | Makes decisions about the appropriateness of coursework   |
| Complaints, Investigations, and Discipline Committee | Makes decisions about the behaviour member subject to a complaint constitutes misconduct or falls below the standards of the profession |
| Appeals Committee                                    | Reviews decisions made by adjudicative committees and sub-committees upon application   |

The Registrar and Office of the Registrar staff do make decisions in regulatory matters but the decisions are more limited and procedural. For instance, the Office of the Registrar will verify membership, assess transcripts, and record exam results. However, matters requiring adjudication (the application of judgment) are the domain and responsibility of the adjudicative committees. It would be improper for Office of the Registrar staff to express opinions about what the decision of an adjudicative committee might be, or the chances that a committee might make one or the other decision.

For instance, it would be inappropriate for Office of the Registrar staff to answer questions such as “do you think the Committee will consider this experience as ‘professional’?” or ‘what do you think my chances are that my alternate route application will be accepted?’ In such cases, the Office of the Registrar staff will always refer to the published criteria and guidance; but will not comment on what the decision of the committee might be.

Giving such advice would be fraught with difficulties for the Office of the Registrar. Consider the situation where Office of the Registrar staff would tell a candidate that 'chances are good that your alternate route application will be accepted' but that upon review the Committee decides that the alternate route application could not be accepted at this time; in such a situation the member might well feel misled.

Similarly, the Office of the Registrar staff will not second guess adjudicative committee decisions after the fact. For instance, the Office of the Registrar cannot respond to questions such as "don't you think the Committee should have given me more points for this?"

One of the roles of the Office of the Registrar is to prepare the files for consideration by the various committees. In this capacity, the Office of the Registrar will ensure that the files are complete and in order before they are forwarded to committees for decision. The Office of the Registrar staff will give feedback and advice as to the completeness of a file. However, this is not the same as encouraging or discouraging an application based on what the Committee might decide; this is providing feedback on the sufficiency of the information that would be forwarded to the committee for decision.

So it is not that the Office of the Registrar doesn't want to be helpful, but it is essential that the roles and responsibilities of the various parties as set out in the Act and the by-laws of the Association be respected. For Office of the Registrar staff to express opinions as to what the decision of a committee might be, or to comment on the probabilities that a committee might make one or another decision, would be crossing a line that should not be crossed.

Office of the Registrar  
Human Resources Professionals Association (HRPA)

