Requirements for earning a designation granted by HRPA: Request for a deadline extension

August 2019

It is HRPA’s policy to provide reasonable extensions to deadlines related to the requirements for earning a designation on human rights grounds (e.g., for candidates with documented disabilities, medical conditions, or who are on parental leave during the timeframe in which the requirement must be met). The purpose of accommodation is to provide equity, not advantage. As a general principle, it is desirable for a deadline extension to remain as close to the original deadline as possible while accommodating the specific disability or condition.

Please note: HRPA expects registrants to seek an extension in a timely fashion in advance of any deadline or before a requirement expires.

Procedure for requesting an extension

1. Registrants must identify themselves in writing to the Office of the Registrar and provide appropriate documentation in support of their request for a deadline extension.

2. The request for an extension must be made only when it is clear that the registrant cannot meet the prescribed timeline. For example, an extension request from a registrant who must submit their Validation of Experience application showing they have acquired three years’ HR experience at a professional level by January 1, 2019, will not be considered prior to January 1, 2016.

3. The Office of the Registrar endeavors to respond to requests for an extension within two weeks of receipt of all relevant documentation. The complexity of the request may affect this timeline.

Documentation

A key aspect of requesting an extension is the documentation that must be submitted in support of the request. The documentation required depends on whether the request for a deadline extension is related to a disability or medical condition, parental leave, or another non-medical condition.

Disability or medical condition

Documented disabilities are those for which there is a diagnosis by a qualified regulated health professional. For a registrant with a disability or medical condition, the type of documentation required will depend on the disability or medical condition being documented. Self-diagnosis is not sufficient or appropriate in supporting a request for accommodation. Individuals with undiagnosed disabilities are strongly encouraged to seek out an appropriate diagnosis of their disability. Registrants requesting a deadline extension due to a disability or medical condition must submit documentation that:

1. Clearly states the diagnosed disability or medical condition leading to the request for extension
2. Includes detailed information relevant to the disability or medical condition leading to the request for a deadline extension
3. Describes how the disability or medical condition affected the registrant’s ability to meet prescribed deadlines
4. Is current to the period for which the extension is being requested
5. Clearly states the specific length of extension being requested
6. Is typed or printed on official letterhead and is signed by a regulated health professional qualified to make the diagnosis (include information about license or certification and area of specialization), or by an evaluator qualified to confirm the condition
7. Is provided in English or French, or is submitted with a certified translation.

Pregnancy and/or Parental leave
A registrant who was on pregnancy and/or parental leave during the timeframe in which a designation requirement was to be met must provide documentation that:
1. Clearly states the timeframe for the parental leave and include government documentation confirming the dates and duration of the parental leave
2. Describes how the pregnancy and/or parental leave affected the registrant’s ability to meet prescribed deadlines.
3. Is current to the period for which the extension is being requested
4. Clearly states the specific length of extension requested
5. Is provided in English or French, or is submitted with a certified translation.

Other non-medical situations
A registrant who is requesting a deadline extension for a non-medical reason other than pregnancy and/or parental leave must provide documentation that:
1. Clearly states the situation leading to the request for extension
2. Includes detailed information relevant to the situation leading to the request for a deadline extension
3. Describes how the situation affected the registrant’s ability to meet prescribed deadlines
4. Is current to the period for which the extension is being requested
5. Clearly states the specific length of extension being requested
6. Is typed or printed on official letterhead and is signed by an evaluator qualified to confirm the situation
7. Is provided in English or French, or is submitted with a certified translation.

Appeal

The Office of the Registrar will consider the Ontario Human Rights Code and HRPA Policy in deciding on deadline extension requests. Should the registrant requesting an extension not agree with the decision of the Office of the Registrar, the registrant may appeal the decision to the HRPA’s Appeals Committee.

The parties to an appeal of a proposed extension (or the decision that no extension is warranted) are the Registrar and the individual requesting an extension. As part of the appeal process, the Registrar will be asked to demonstrate that the extension requested effectively alters the nature of the certification requirement, and/or that the extension requested is not in the public interest and/or is not otherwise justified or necessary.

Confidentiality

It is understood that health and other personal information is highly sensitive. Documentation submitted in support of a deadline extension request will be kept separate from the registrant’s file and will only be available to Office of the Registrar staff. Your confidential request can be sent directly to Nathalie Moir, Manager, Regulatory Operations at nmoir@hrpa.ca.