

Registrar’s Report for Q4 2021

November 30, 2021

Table of Contents

Top five regulatory highlights for 2021	2
How OOTR resources were deployed across regulatory functions in 2021.....	4
What is the difference between the registration report and the renewal report?	5
Special report: Registration 2021.....	6
Special report: Renewal 2021.....	19
Special report: Compliance 2021.....	26
Regulatory activity coordination and policy development.....	32
Regulatory operations.....	15
Regulatory operations performance overview.....	34
Registration and certification	36
Standards and Guidance.....	49
Quality assurance	50
Complaints, discipline, capacity, and review.....	52
Appeals.....	58
Stakeholder education.....	61
Trends and issues in professional regulation	63
Cayton delivers Law Society of BC report.....	63
Update on College Performance Measurement Framework	64

The Registrar’s Report is produced on a quarterly basis. The Registrar’s Report details regulatory activity for the previous quarter. In addition, the Registrar’s Report includes special reports on pertinent issues and reviews trends and issues in the professional regulation in the previous quarter. The sections relating to the activity of specific committees were reviewed for accuracy by the Chair of the respective committee.

Top five regulatory highlights for 2021

As this Registrar's Report documents a lot of work gets done and much is not visible, however the five initiatives below stand out regarding what was achieved in 2021.

Regulatory Committee Boot Camp

At its September 10, 2020, meeting the Governance and Nominating Committee adopted five measures to enhance the governance of HRPAs Regulatory Committees:

- a. A merit-based, transparent, fair, and impartial appointment process for HRPAs Regulatory Committees which would include a regulatory committee Boot Camp to be held for those who may be interested in applying to serve on one of HRPAs regulatory committees,
- b. Selection profiles for each of HRPAs regulatory committees,
- c. That the GNC would review and approve the rosters for HRPAs regulatory committee before the appointments take effect,
- d. That the GNC would review and approve the appointment of Chairs and Vice-Chairs for HRPAs regulatory committees,
- e. A proposed annual meeting between the Board and the Chairs and Vice-Chairs of HRPAs Regulatory Committees

The main objective of the regulatory committee boot camp was to ensure that individuals considering applying for appointment to one of HRPAs regulatory committees have a good understanding of what is involved in being a member of one of HRPAs regulatory committees.

On February 16, 2021, HRPAs held a two-hour live session aimed at all those who might be interested in appointment to one of HRPAs regulatory committees. Individuals who could not make it to the live Boot Camp had the option of viewing the recording of the event. The Boot Camp was a great success and will become part of the process going forward.

Continuing Professional Development Virtual Audit

In 2020, most regulatory activity moved to a remote environment. One process that had yet to move to a virtual environment was the Continuing Professional Development audit review. In 2021, 5,258 Continuing Professional Development logs were due to be submitted. On a random basis, 178 logs were selected as part of the Continuing Professional Development audit review process.

The CPD audit review occurred virtually this year due to the pandemic. To support the virtual audit, an online submission platform was utilized by the Committee. The CPD audit concluded on November 15, 2021. The virtual CPD audit was a success and will become the process going forward.

CNAR Conference Presentation on risk-based regulation

HRPA has adopted risk-based regulation as its model for professional regulation. Most professional regulatory bodies have adopted risk-based regulation to some degree. Most professional regulatory bodies that have adopted risk-based regulation have depended on complaints to identify risks to the public stemming from the practice of the profession. HRPAs has a very low complaint rate, this means

that HRPAs cannot depend on complaints to identify risks. As a result, the OOTR needed to get creative in its approach to the identification of risks. HRPAs are at the leading edge here and wanted to share with the professional regulatory community what it had learned from this pioneering work.

The Policy Team presented at the CNAR conference on October 14, 2021, for a one-hour session, with the official session entitled as *“Preventing Risks to the Public Before They Happen: Practical Tools for Risk-Based Regulators.”*

The session was well attended and very well received.

First Annual Meeting of the HRPAs Board of Directors and the Chairs and Vice-Chairs of HRPAs Regulatory Committees

Another initiative that was part of the set of initiatives adopted by the Governance and Nominating Committee was a proposed annual meeting between the Board and the Chairs and Vice-Chairs of HRPAs Regulatory Committees. The purpose and intent of this session was to build a stronger relationship between the Board and HRPAs regulatory committees. This stronger relationship will support the Boards ability to fulfil its oversight duties, as well to provide regulatory committee Chairs and Vice-Chairs an opportunity to share with the Board some of their committee experiences.

On November 8, 2021, the HRPAs Board of Directors and the Chairs and Vice-Chairs of HRPAs Regulatory Committees met. By all accounts, the meeting was a great success and met all expectations.

Mapping the delegation of authorities at the OOTR

Two threads came together for this initiative. One thread was the mapping of accountabilities at the Executive Leadership Team Virtual retreat, the other thread was the review of delegation of authorities at HRPAs conducted by Rebecca Durcan, HRPAs regulatory counsel, at the behest of the Governance and Nominating Committee. A gap was noted in the mapping of delegations from the Registrar.

The OOTR Management Team defined the conditions and limitations placed on delegations from the Registrar as the specific cascade of delegations at the OOTR.

How were OOTR resources deployed across regulatory functions in 2021?

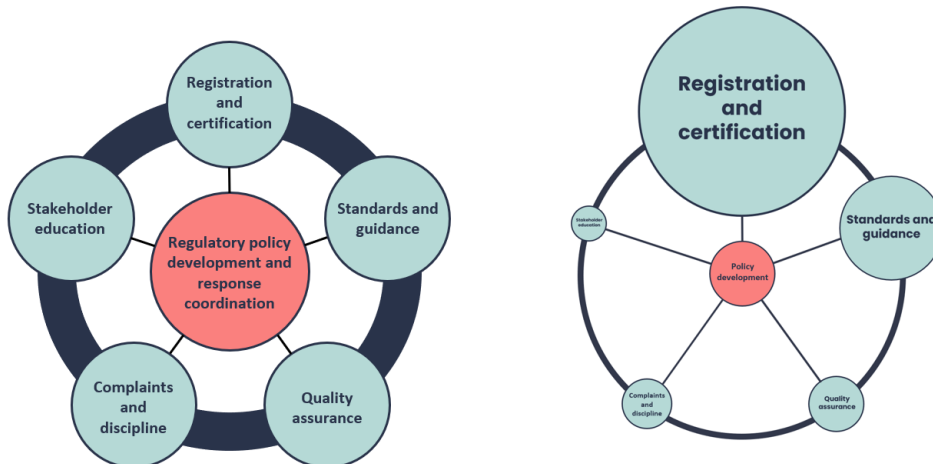
The OOTR comprises six functions. The best metric for resource allocation is expenditures when these are fully loaded and include external resources such as consultants and volunteers.

Function	Percent of OOTR total resources
Regulatory response formulation and policy development	5%
Registration and certification	70%
Standards and guidance	15%
Quality assurance	5%
Complaints, discipline, capacity, and review	3%
Stakeholder education	2%
Total	100%

In 2021, 70% of OOTR expenditures were in support of the Registration and Certification function. The Standards and guidance function came in at 15%.

When the OOTR functional diagram is drawn proportional to resource expenditure the following diagram obtains.

2021 Resource allocation at the OOTR



What is the difference between the registration report and the renewal report?

This Registrar's Report includes two special reports—one on registration numbers and the other on renewal numbers—what is the difference?

The Registration Report takes a snapshot of HRPAs register on the last day of the fiscal year (November 30) and compares this snapshot to previous end-of-fiscal snapshots. The Registration Report also looks at the movement of registrants from one registration class to another since the previous end-of-fiscal snapshot.

The Renewal Report is based on renewal invoices issued. Renewal invoices are issued on or about March 15 of each year. Individuals joining HRPAs after March 15 are also issued renewal invoices for the next years. Students who register on or after March 1 are also registered for the next year. These students do not receive a renewal invoice. The final number of invoices issued is not known until June 1 of each year. Individuals joining after June 1 are not counted in the analysis of renewal rates for the year in progress.

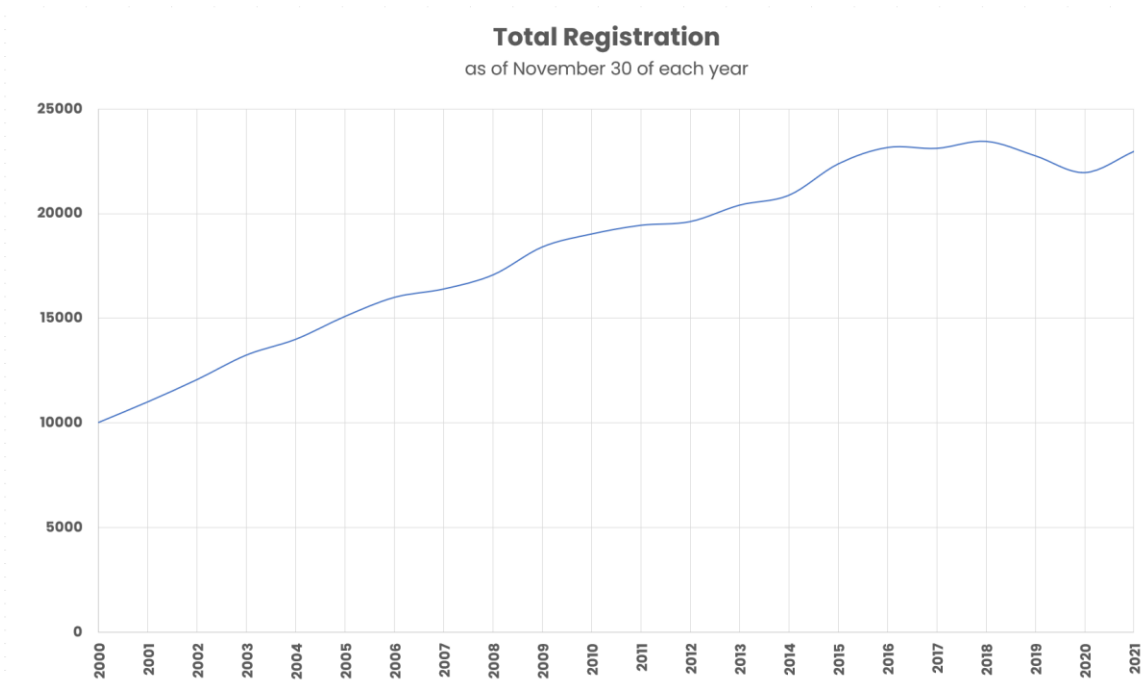
All this to say that the Registration Report and the Renewal Report answer different questions in different ways.

Registration 2021 by the numbers

Public register

HRPA ended the fiscal year (November 30, 2021) with 22,970 registrants, at end-of-fiscal last year (November 30, 2020) registration stood at 21,957. This represents a 4.6% year-over-year gain in registration. The peak end-of-fiscal registration count was in 2018, with 23,448 registrants.

Figure 1: Registration count on November 30 from 2000 to 2021



Registration count by week

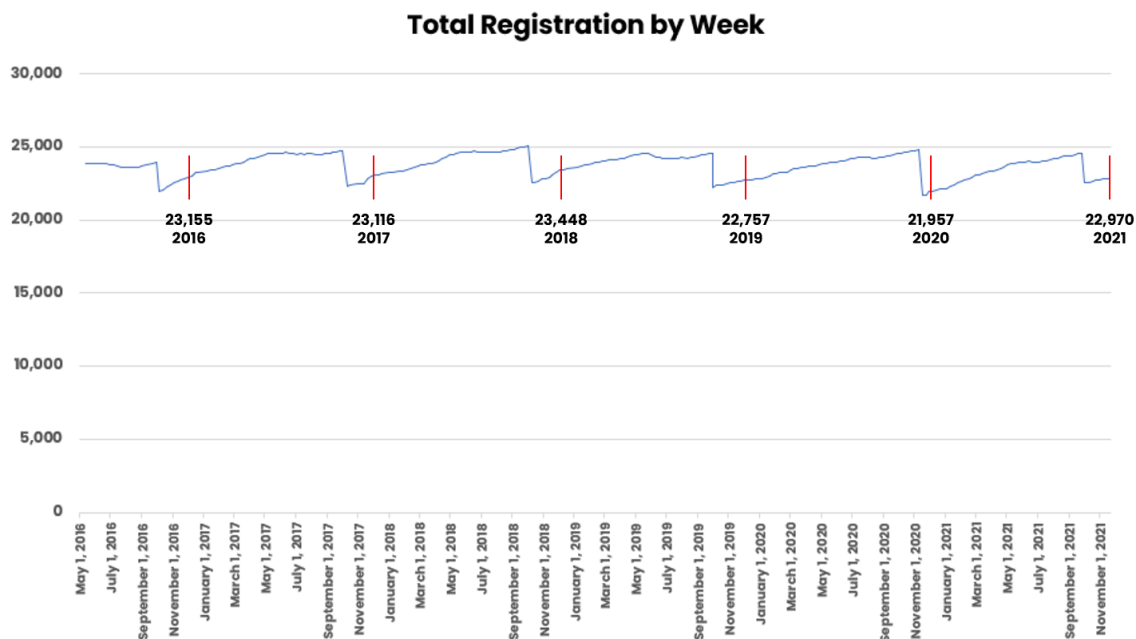
Registration count varies significantly throughout the year. The highest registration count in fiscal 2020–2021 was 24,594 on September 27, 2021, and the lowest registration count in fiscal 2020–2021 was 21,964 on December 4, 2020. For any given year, the highest registration count will occur just before revocation, and the lowest registration count will occur just after revocation. The highest registration count was on September 30, 2018, with 25,068 registrants.

Figure 2, below, gives weekly registration counts for the last six years.

There is a pronounced sawtooth pattern with a big drop at revocation. There are two ways of ending registration with HRP: resignation or revocation. Resignations take effect immediately but revocations for non-renewal can only take effect after proper legal notice. When registrants do not renew their registration and do not give any indication of their intention to end their registration with HRP, HRP must then go through formal steps before determining that the registrant has in fact ended their registration with HRP. Revocation for failure to renew occurs on October 1 of each year (in 2020, because of the extension to the renewal deadline, this date was November 13).

Only 18% of registrants who do not intend to renew their registration with HRP A will resign. Putting it the other way around, 82% of registrants who do not intend to renew their registration with HRP A will wait to be suspended and eventually revoked once the respective notice periods have passed. This leads to the sawtooth pattern.

Figure 2: Registration count by week 2016–2021



The vertical red lines are end-of-fiscal (i.e., November 30). These are the registration counts that are reported in the Annual Report.

Total registration gains and losses

Each year HRP A attracts new registrants but loses existing registrants. A question to be answered is whether the upswing in 2021 is due to lower losses (higher retention) or more gains, or a combination of both.

The best way to present the data is to think of the start of the year as 100%, in the year there will be gains (expressed as a percentage of the registration count at the start of the fiscal year), but there will also be some losses (expressed as a percentage of the registration count at the start of the fiscal year). Adding up the percentage gain and the percentage loss one gets the year-over-year percentage change.

Table 1: Registration gains and losses 2019–2021

	Start	Gain	Loss	End
2021 (December 1, 2020, to November 30, 2021)	21,957	+3,010	-1,997	22,970
2020 (December 1, 2019, to November 30, 2020)	22,757	+2,533	-3,333	21,957
2019 (December 1, 2018, to November 30, 2019)	24,448	+1,585	-3,276	22,757

The 4.6% year-over-year is the result of both stronger gains and fewer losses than in previous years, with the fewer losses gains having somewhat more of an impact than the greater gains.

How many registrants who joined in 2021 had previously been registered with HRP A?

There was a total of 78 registrants out of 3,010 (2.6%) who rejoined in 2021 who were previously registered with HRP A.

This tells us that the upswing in registration in 2020-2021 is not the result of individuals coming back after dropping out for a year because of the COVID-19 pandemic.

Year-over-year change in registration count by registration class

Table 2, on the next page, gives registration counts by class from 2015 to 2021.

There are some important points, however. There have been dramatic changes in the number of individuals registered in the Student class since 2018. This was not so much because of a loss of Student registrants but a misclassification of these individuals. For the most part, these individuals should have been registered in the Practitioner class (and were subsequently reclassified in the Practitioner class).

Figure 3 below illustrates the issue. The corrections to the Student registration class were made in two phases, one in 2019 and another in 2020. This led to a reduction of registration in the Student class and a corresponding increase in registration in the Practitioner class. The implication of these corrections is that any comparison involving pre-2020 registration counts in either the *Student* or *Practitioner* registration classes are not likely to be very meaningful.

The Allied Professional class also shows a correction from 2018. Until 2018, registration with HRP A was bundled with completion of the *Certificate in Human Resources for CPAs* program. This practice has since been discontinued resulting in reduction in the number of registrants in the Allied Professional class.

Caution should also be taken in interpreting Student class registration numbers, not because of the misclassification issue noted above—this issue was resolved in early 2020 and did not impact the 2021 year-over-year comparison—but because the Student class is inherently volatile. Many individuals in the Student registration class are there for only a matter of months before moving to another registration class.

Figure 3: Impact of the Student registration class 'clean-up'

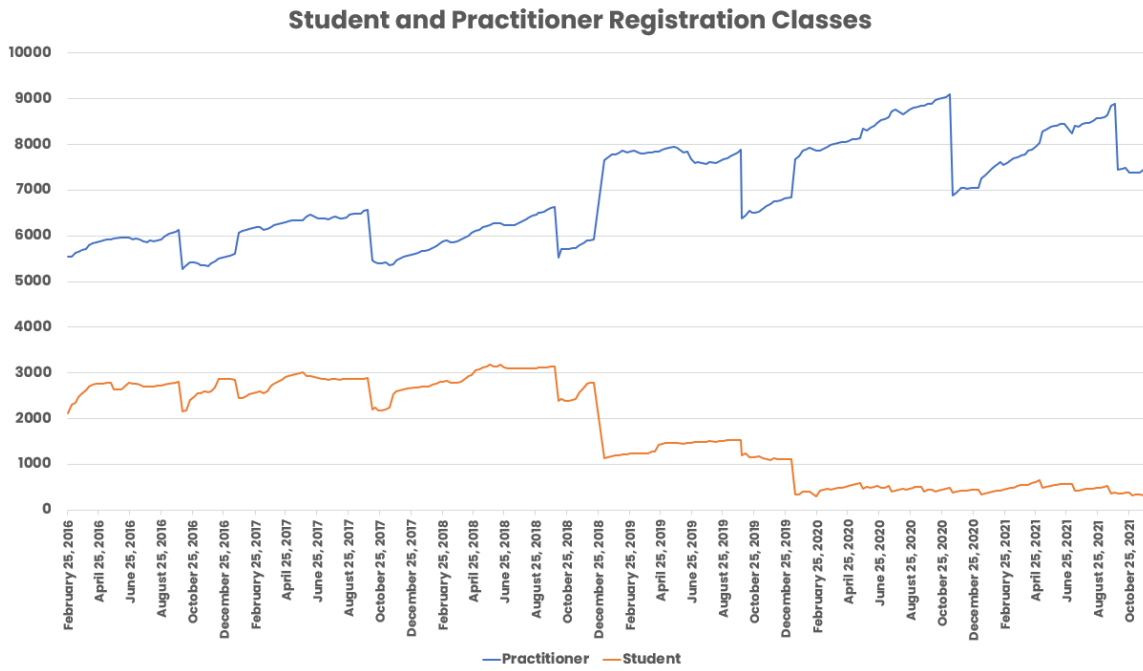


Table 2: Registration by class 2015–2021

Registration class	2015	2016	2017	2018	2019	2020	2021
Designated members	13,980	14,681	14,717	14,529	14,649	14,286	14,918
Certified Human Resources Executive (CHRE)	216	251	269	269	270	257	253
Certified Human Resources Leader (CHRL)	9,329	9,289	9,053	9,076	9,613	9,106	9,104
Certified Human Resources Professional (CHRP)	4,435	5,141	5,395	5,184	4,766	4,923	5,561
Undesignated Members	5841	5626	5759	6144	6993	7252	7,720
Practitioner	5,672	5,417	5,536	5,892	6,751	7,046	7,505
Allied Professional	169	209	223	252	242	206	215
Total members	19,821	20,307	20,476	20,673	21,642	21,538	22,638
Students	2,513	2,848	2,640	2,775	1,115	419	332
Total registrants	22,334	23,155	23,116	23,448	22,757	21,957	22,970

Table 3: Comparing 2020 and 2021 registration counts by class

Registration class	2020	2021	% Change
Designated members	14,286	14,918	4.4%
Certified Human Resources Executive (CHRE)	257	253	-1.6%
Certified Human Resources Leader (CHRL)	9,106	9,104	0.0%
Certified Human Resources Professional (CHRP)	4,923	5,561	13.0%
Undesignated Members	7252	7,720	6.5%
Practitioner	7,046	7,505	6.5%
Allied Professional	206	215	4.4%
Total members	21,538	22,638	5.1%
Students	419	332	-20.8%
Total registrants	21,957	22,970	4.6%

The proportion of HRPAs members who are designated from 2015 to 2020

There is an interest in the proportion (percentage) of HRPAs members who are designated. Data was available on a weekly basis from February 25, 2016¹.

$$\text{Designated members as a percentage of membership} = \frac{\text{Number of members who are designated}}{\text{Total number of members}}$$

As noted above, however, any comparison involving pre-2020 registration counts in either the *Student* or *Practitioner* registration classes are not likely to be very meaningful. The work-around is to use total registration as the denominator. Calculated this way, the misclassification of Students would have no effect.

$$\text{Designated members as a percentage of registration} = \frac{\text{Number of members who are designated}}{\text{Total registration}}$$

Figure 4, on the next page, gives the percentage of registrant who are designated on a weekly basis starting February 25, 2016.

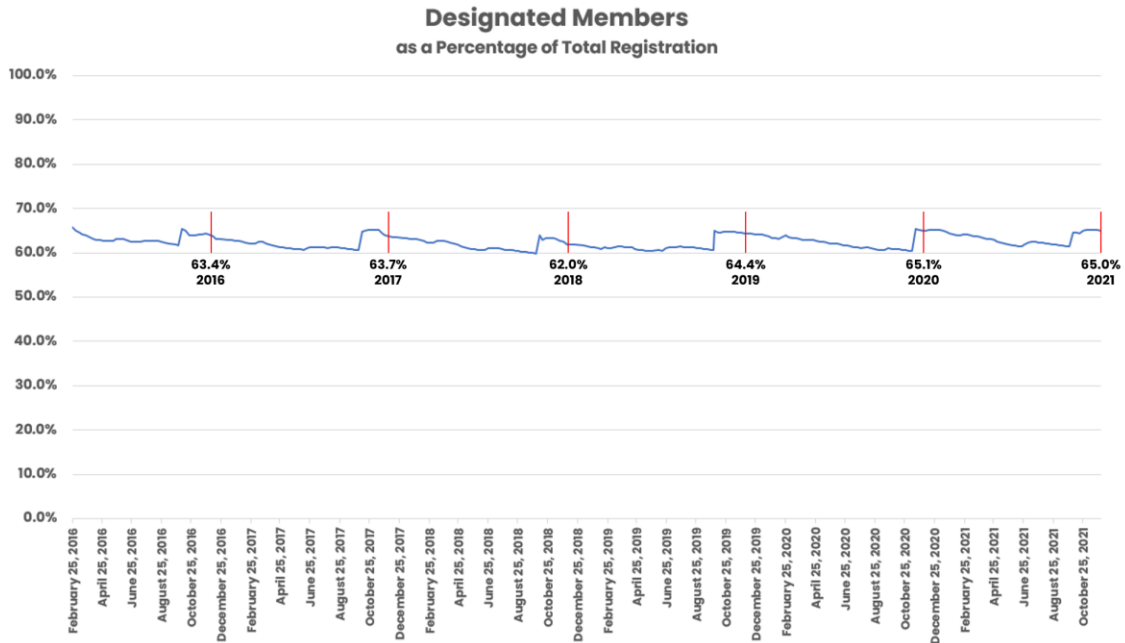
Again, there is a strong cyclical variation in the proportion of registrants who are designated. For instance, in fiscal 2020-2021 the minimum designated members to total registration ratio was 61.4% on September 27, 2021, the maximum designated members to total registration ratio was 65.3% on December 14, 2020. This is the inverse of the pattern for total registration count. As noted above, the retention rate for designated members is significantly higher than for undesignated members and students. Revocation will have a greater impact on undesignated members and students.

Nonetheless, one can have a sense of the trend by considering the same date across the years. Figure 5, on the next page, gives the proportion of members who are designated on November 30 of each year since 2015.

The proportion of members who are designated appears to have edged slightly up over the last six years.

¹ It does not make sense to go much before this date. On October 28, 2014, the new designation framework was introduced. On that day, all CHRP candidates which were, before this date, undesignated registrants immediately became designated members. There was a big jump overnight in the proportion of designated members.

Figure 4: Designated members as a percentage of total registration by week



Inter-class movement

Tables 4 and 5 on the next pages tracks the movement of registrants between classes between November 30, 2020, and November 30, 2021.

The best way to understand Table 4 is to read it horizontally. For instance, on November 30, 2020, there were 4,922 individuals registered in the CHRP registration class. We find that, a year later, 1 of these individuals had obtained the CHRE designation, 116 had obtained the CHRL designation, 4,574 renewed their registration in the CHRP registration class, 54 were bumped down to the Practitioner registration class (either because they did not meet the Continuing Professional Development requirement or voluntarily because they no longer wanted to be subject to the Continuing Professional Development requirement), none went to the Allied Professional registration class, none went to the Student registration class, and 177 are no longer registered with HRP.

Table 5 gives the ‘ins and outs’ for each registration class. There are two ways that registration in a given class increases: (1) individuals who enter the class upon initial registration (new registrations), and (2) individuals who enter the class from another class. There are two ways that registration in a given class decreases: (1) individuals who move to another class, and (2) individuals who do not renew their registration (i.e., resignations and revocations).

Table 4: Inter-class movement

	November 30, 2020	November 30, 2021						
		CHRE	CHRL	CHRP	Practitioner	Allied Professional	Student	Non-registrant
Certified Human Resources Executive (CHRE)	257	236	0	0	6	0	0	15
Certified Human Resources Leader (CHRL)	9,107	6	8,718	1	95	0	0	287
Certified Human Resources Professional (CHRP)	4,922	1	116	4,574	54	0	0	177
Practitioner	7,046	8	157	717	4,769	5	9	1,381
Allied Professional	206	0	0	9	0	161	0	36
Student	419	0	0	34	224	0	60	101
Non-registrant	3,010	2	113	226	2,357	49	263	X

Table 5: Detailed account of the ins and outs of each registration class between November 30, 2020, and November 30, 2021

Registration class	November 30, 2020	No longer registered with HRPA	Moved to another class	Came from another class	New registration in class	November 30, 2021
Certified Human Resources Executive (CHRE)	257	15	6	14	2	253
Certified Human Resources Leader (CHRL)	9,106	287	102	233	113	9,104
Certified Human Resources Professional (CHRP)	4,923	369	94	761	226	5,561
Practitioner	7,046	1,381	896	343	2,357	7,505
Allied Professional	206	36	9	5	49	215
Student	419	101	258	9	263	332

Initial registrations

Note that tables 4 and 5 were created by comparing two snapshots of HRPAs register—one on November 30, 2020 and the other on November 30, 2021. These tables do not consider the registrants we will call *'in-and-outers.'*

'In-and-outers' are Individuals who register on or after the first day of the fiscal year (i.e., on or after December 1) but who resign or are revoked before the last day of the fiscal year (i.e., on or before November 30). These individuals will not appear in either end-of-fiscal lists or tables, also they would not appear in any year-over-year comparisons.

Initial registrations can be in one of three classes: Student, Practitioner, or Allied Professional. Of course, by the end of fiscal some of these registrants will have moved to another registration class, but some will have resigned or been revoked for non-renewal.

Individuals who registered in either the Practitioner or Allied Professional registration classes between December 1, 2020 and June 1, 2021, and who did not renew their registrations (i.e., resignations or revocations) would not appear in either the 2020 end-of-fiscal registration list or the 2021 end-of-fiscal registration list. Individual who registered in either the Practitioner or Allied Professional registration classes after June 1, 2021, would be registered for the that year and therefore would appear on the 2021 end-of-fiscal registration list.

Because individuals who register in the Student registration class benefit from *'push-through'* registration, the dates are a bit different. For students, initial registrations after March 1 include what is left of the current registration year and the following registration year. These individuals are not issued renewal invoices. Individuals who registered in the Student registration class between December 1, 2020 and March 1, 2021, and who did not renew their registrations (i.e., resignations or revocations) would not appear in either the 2020 end-of-fiscal registration list or the 2021 end-of-fiscal registration list. Individual who registered in the Student registration class after March 1, 2021, would be registered for the next year by virtue of the *'push-through'* and therefore would appear on the 2021 end-of-fiscal registration list.

'In-and-outers' do not appear in end-of-fiscal tallies, but they do appear in the quarterly tally of new registrations in the registration section of the *Registrar's Reports*, and unless a new registrant resigns before March 15, they will receive a renewal invoice and be counted in the renewal statistics.

Table 6 below gives the number of registrations between the dates of December 1, 2020 and November 30, 2021, for each of the registration classes in which one can initially register as well as where these registrants were on November 30, 2021. Note that 496 individuals who registered with HRPAs after the start of the fiscal year were already gone by the last day of the fiscal year.

Table 7 gives the number of *'in-and-outers'* as a percentage of initial registrations between the dates of December 1, 2020 and November 30, 2021.

Table 6: New registrations between December 1, 2020 and November 30, 2021

Registration class upon registration	Count (new registrant acquisition)	Registration Class at End-of-Fiscal						
		CHRE	CHRL	CHRP	Practitioner	Allied Professional	Student	Non-registrant
Practitioner	2,760	2	124	201	1,965	0	1	467
Allied Professional	57	0	2	4	0	46	0	5
Student	733	0	1	29	418	0	261	24
Total	3,550	2	127	234	2,383	46	261	496

Table 7: 'In-and-outers'

Registration class upon registration	Count (new registrant acquisition)	Still registered at end of Fiscal	Non-registrant (in-and-outers)	Percent in-and-outers
Practitioner	2,760	2,293	467	16.9%
Allied Professional	57	52	5	8.8%
Student	733	709	24	3.3%
Total	3,550	3,054	496	14.0%

Out-of-province registration as of November 30, 2021

Table 8 gives the number of non-resident registrants by registration class and by Canadian province or international.

Table 8: Out-of-province registration as of November 30, 2021

	Ontario	Alberta	Quebec	British Columbia	Nova Scotia	New Brunswick	Saskatchewan	Manitoba	Northwest Territories	Newfoundland and Labrador	Prince Edward Island	Nunavut	Yukon	Total Canadian provinces excluding Ontario	International	Total outside Ontario	Total
Designated members	14,533	61	57	59	25	6	12	8	2	5	2	3	6	246	139	385	14,918
Certified Human Resources Executive (CHRE)	233	3	3	4	2	1	0	0	0	0	0	0	0	13	7	20	253
Certified Human Resources Leader (CHRL)	8,863	37	35	32	13	5	6	3	2	2	1	3	3	142	99	241	9,104
Certified Human Resources Professional (CHRP)	5,437	21	19	23	10	0	6	5	0	3	1	0	3	91	33	124	5,561
Undesignated Members	7,448	46	52	25	8	4	7	4	3	3	5	2	3	162	110	272	7,720
Practitioner	7,237	43	51	25	8	4	7	4	3	3	5	2	3	158	110	268	7,505
Allied Professional	211	3	1	0	0	0	0	0	0	0	0	0	0	4	0	4	215
Total members	21,981	107	109	84	33	10	19	12	5	8	7	5	9	408	249	657	22,638
Students	326	1	1	1	0	0	0	1	0	0	0	0	0	4	2	6	332
Total registrants	22,307	108	110	85	33	10	19	13	5	8	7	5	9	412	251	663	22,970

Table 8: Resident and non-resident registrations 2017-2021

	2017	2018	2019	2020	2021
Ontario residents	22,513	22,845	22,173	21,359	22,307
Residents of other Canadian provinces	378	359	343	346	412
International residents	225	244	241	252	251
% international residents	0.97%	1.04%	1.06%	1.15%	1.09%
% non-residents	2.6%	2.6%	2.6%	2.7%	2.9%

HRPA has 663 (2.9%) registrants who are not residents of Ontario, and 251 (1.09%) registrants who reside outside of Canada. Again, the proportion of registrants who do not reside in Ontario may be drifting up ever so slightly.

Practice through firms

Although HRPA has established but not yet proclaimed the by-laws relating to the registration and regulation of firms, nonetheless, in anticipation of this proclamation the registration and renewal processes require applicants and registrants to indicate whether they practice through a firm, and if so, what type of firm they are practicing through.

Table 9: Do you practice through a firm?

Yes	898	3.9%
No	22,072	96.1%
Total	22,970	100.0%

3.9% of HRPA registrants practice through a firm.

Table 9: What type of firm do you practice through?

Sole proprietorship	261	29.1%
Partnership	53	5.9%
Limited Liability Partnership	35	3.9%
Corporation	549	61.1%
Total	898	100.0%

Table 9 suggest that corporations is the preferred form of practice when practicing through a firm.

Authorized for independent practice

To be authorized for independent practice, one must meet the Professional Liability Insurance (PLI) requirement. The Professional Liability Insurance (PLI) requirement has two essential components: (1) to obtain a sufficient amount of professional liability insurance, and (2) to notify the Registrar of such. That one is authorized for independent practice is recorded in the public register.

Table 10: Registrants who are authorized for independent practice

Yes	543	2.4%
No	22,427	97.6%
Total	22,970	100.0%

The numbers do not line up in an important way: 848 registrants indicated that they were in independent practice, yet only 543 are authorized for independent practice.

Table 11: Crosstabulation of authorization for independent practice with practice through a firm

		Authorized for Independent Practice		Total
		Yes	No	
Practicing through a firm	Yes	334	564	898
	No	209	21,863	22,072
Total		543	22,427	22,970

Based on the table above the Professional Liability Insurance requirement compliance rate for individual practicing through a firm is $334/898 = 37.2\%$, which is in line with other estimates.

Renewal 2021 by the Numbers

Although the pandemic continues to impact our lives, 2021 saw a return to normal in many ways. This year saw a return to the usual time frames for registration renewal.

Milestone	Date
'Push through' registration begins for Students	March 1, 2021
Renewal invoices issued	March 15, 2021
Registration opens	March 29, 2021
Renewal deadline	May 31, 2021
Suspension deadline	July 15, 2021
Revocation deadline	October 1, 2021

The renewal campaign proper was eight weeks long. However, it was possible to renew one's registration until revocation, which gives a twenty-seven-week window in which to renew one's registration with HRP. This year revocation was on October 1 instead of September 30 because HRP's offices were closed to observe the *National Day for Truth and Reconciliation*.

For 2021, the renewal dues were frozen from 2020 rates.

This year, the application of the late dues' penalty of \$100 for members and \$20 for students was postponed until June 30, 2021, although this was not announced until after the registration deadline so as to not encourage late renewal.

Overall, the 2021 renewal rate was 89.4%.

Registration class is registration class in which the renewal invoice was issued

Renewal rates are calculated as follows:

$$\text{Registration Class Renewal Rate} = \frac{\text{Number of renewals in any class}}{\text{Number of renewal invoices issued in class}}$$

Renewal invoices are generated on or about March 15 for all individuals appearing on the register at that time. Renewal invoices are also generated for individuals who register with HRP after March 15 up to May 15 (after May 15, individuals are registered for the next year.)

Renewal rates are reported according to the registration class in which the renewal invoice was issued. For instance, a registrant is issued a renewal invoice for the *Practitioner* class, but this individual is granted the CHRL designation after the invoice was generated. Upon renewal, this individual would be counted as a *Practitioner* who has renewed. It is registration class when the invoice was issued that counts.

Changes in registration class come into effect at the time a registrant meets the requirements for a new class. However, invoices, once issued, are not updated, or reissued for that year. For example, an

individual registered in the Practitioner class who is granted a designation after March 15 will see their registration class changed their new class immediately, but their invoice will remain at the Practitioner level.

Students and ‘push-through’ registrations

On a monthly basis, individuals registered in the Student class whose graduation date on file is in the next month are asked to confirm their graduation date to ensure that the information is accurate. Individuals who no longer qualify for the Student class are notified that their registration class will change to the Practitioner class.

Individuals who initially register in the Student class benefit from the *recent graduate discount*. For two renewal cycles after the individual has moved to another class, their dues will remain at the Student dues level. These are known as *transitional invoices*.

Students with graduation dates on or before the end of February are issued transitional invoices. Students with graduation dates of March 1 or later are issued Student invoices.

Student who register on or after March 1 up to and including May 31, are registered for the remainder of the registration year and for the next year. This is called push-through registration. These registrants are not issued a renewal invoice as they are ‘automatically’ registered for the next registration year.

Table 1: Renewal rates by registration class

	Renewal invoices issued	Renewal invoices paid	Renewal invoices unpaid	Renewal rate
Designated members	14,803	14,284	519	96.5%
Certified Human Resources Executive (CHRE)	262	249	13	95.0%
Certified Human Resources Leader (CHRL)	9,269	8,961	308	96.7%
Certified Human Resources Professional (CHRP)	5,272	5,074	198	96.2%
Non-designated members	8,709	6,802	1,907	78.1%
Practitioner	8,473	6,606	1,867	78.0%
Allied Professional	236	196	40	83.1%
Total members	23,512	21,086	2,426	89.7%
Students	496	381	115	76.8%
Total registrants	24,008	21,467	2,541	89.4%

The renewal rate for designated members is significantly higher than for undesignated members (96.5% v. 78.1%).

Differences in renewal rates across registration classes over time

The table below give the renewal rates for the different classes of registration for the last five years.

Table 2: Renewal rates by registration class for the last five years

	2017	2018	2019	2020	2021
Designated members	95%	95%	95%	93%	96%
Certified Human Resources Executive (CHRE)	94%	95%	95%	92%	95%
Certified Human Resources Leader (CHRL)	96%	96%	96%	93%	97%
Certified Human Resources Professional (CHRP)	93%	92%	94%	92%	96%
Non-designated members	69%	75%	77%	69%	78%
Practitioner	70%	76%	78%	69%	78%
Allied Professional	55%	70%	75%	67%	83%
Total members	88%	89%	90%	84%	90%
Students	69%	65%	66%	81%	77%
Total registrants	85%	86%	87%	83%	89%

Clearly, 2020 was an exceptional year and renewal rates have returned to pre-pandemic levels. Setting aside 2020, there seems to be a small but consistent increase in overall renewal rates since 2017—about 1% per year.

The renewal rate for designated members was 96%, for non-designated members it was 78%, and for students it was 77%. All of these renewal rates are quite similar to pre-pandemic values.

Caution should be taken in interpreting the numbers for Students. In 2019 and 2020, significant changes were made to how *Students* were accounted for.

Also, for the *Allied Professional* registration class, in previous years registration with HRP was bundled with the attendance in certain professional development offerings. For these *Allied Professionals*, the first-year registration dues were deemed to be included in the price of the professional development offering. In the following year, however, *Allied Professionals* were expected to pay dues (which are nonetheless much less than for other registration classes except Students). At that time, most of these individuals would not renew their registration with HRP. Since HRP abandoned this practice, the renewal rate for *Allied Professionals* had increased significantly.

Comparing the renewal rates for *Practitioners* paying the *Student* rate and the renewal rate for *Practitioners* paying the normal *Practitioner* rate

Individuals who register as *Students* before moving to another registration class continue to pay dues at the *Student* level for two more registration cycles. This price reduction was intended to ease the transition from *Student* to *Practitioner*.

This means that some individuals registered in the *Practitioner* class are paying Student dues whereas other individuals registered in the *Practitioner* class are paying normal Practitioner dues.

Table 3: Comparing the renewal rates for Practitioners paying the Student rate (i.e., recent graduates) and the renewal rate for Practitioners paying the normal Practitioner rate

Registration class at time renewal invoice was generated	Renewal invoices issued	In-province dues	Non-registrant	Renewal rate
Student (Student rate)	496	\$100.	115	76.8%
Practitioner (Student rate)	1,012	\$100.	282	72.1%
Practitioner (normal Practitioner rate)	7,463	\$415.	1,585	78.7%

Individuals who were registered in the *Student* class and who met the requirements of the *Student* class at the time the renewal invoices were generated had a renewal rate of 76.8%. Individuals who were registered in the *Practitioner* class but who had been registered in the *Student* class in the last two years and therefore benefitted from the recent graduate discount had a renewal rate of 72.1%. Individuals who were registered in the *Practitioner* class and paying full Practitioner dues had a renewal rate of 78.7%. This suggests there is more than cost involved here.

Renewal progress

Figure 1, below, gives the weekly renewal counts from the start of the renewal period (April 1, 2021) through to the revocation deadline (October 1, 2021).

- 25% of all renewals (5,296) occurred in the week before the renewal deadline.

Figure 1: Renewal by week April 1, 2021 to October 1, 2021

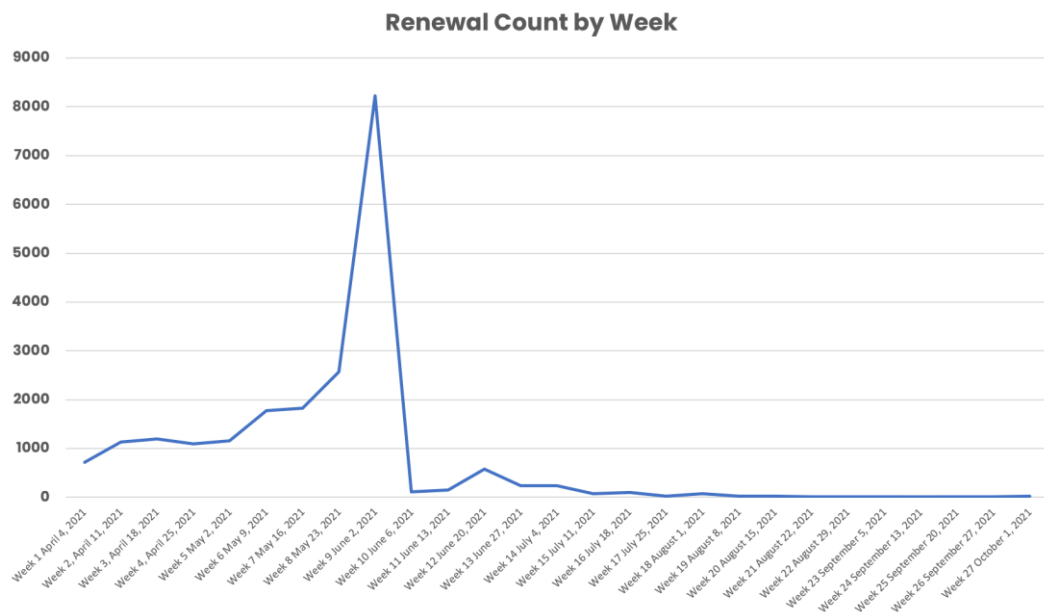
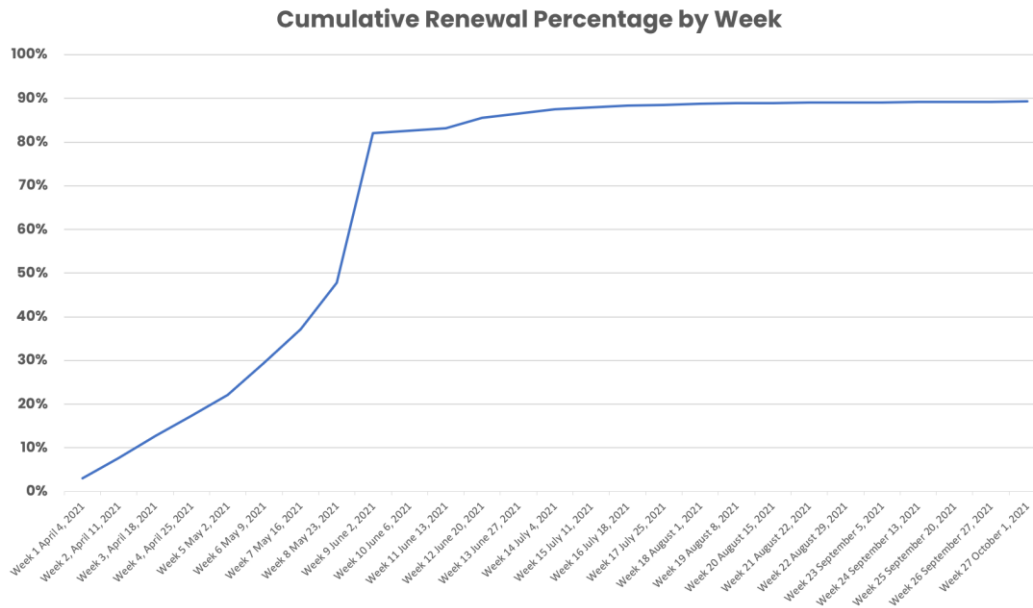


Figure 2 presents the same data but as a cumulative graph.

Figure 2: Cumulative overall renewal rate by week



At the renewal deadline, 82.1% of invoices issued had been paid.

$$\text{Percentage of invoices issued paid on or before the renewal deadline} = \frac{19,716}{24,008} = 82.1\%$$

Of course, not all outstanding invoices at the renewal deadline would be paid. Of the invoices that would eventually be paid, 91.9% were paid at or before the renewal deadline.

$$\text{Percentage of invoices eventually paid that were paid on or before the renewal deadline} = \frac{19,716}{21,457} = 91.9\%$$

Ghosting index

There are two ways of ceasing to be registered with HRP—*resignation* and *revocation*. The proper way of terminating registration with HRP is by resigning. The issue faced by HRP is akin to *ghosting* in employment.

“Employers are concerned about the growing trend of candidates who don’t show up to scheduled interviews, don’t arrive on the first day of work or even quit without giving notice. This trend is also known as “ghosting” in the workplace.”

When employees quit without giving notice, the employer must go through some legal steps to establish that the employee has terminated the employment relationship. Registration with HRP is similar. When registrants do not respond to requests to renew their registration with HRP by either

² <https://www.peoplescout.com/insights/ghosting-in-the-workplace/>

renewing or resigning, they are ‘ghosting.’ HRPAs must then go through some formal steps before ascertaining that the registrant has in fact terminated their registration with HRPAs.

A Ghosting Index can be calculated:

$$\text{Ghosting Index} = \frac{\text{Revocations}}{\text{Resignations} + \text{Revocations}} = \frac{2,073}{468 + 2,073} = 82\%$$

Only a minority of registrants who will not renew their registration with HRPAs notify HRPAs of their intentions. Roughly, only about 18% of registrants who will not renew their registration with HRPAs notify HRPAs of their intentions.

If registrants who no longer wished to renew their registration with HRPAs resigned as opposed to letting their registration lapse, most of the drop in registration would occur on or about the renewal deadline.

Renewal Dues Assistance Program (RDAP)

The *Renewal Dues Assistance Program (RDAP)* is an update to the *Reduced Dues and Member Disability Assistance Program (MDAP)* which had been in place previously. The most notable difference between RDAP and previous programs is that the RDAP program offers more levels of dues relief than the previous approach. The amount of dues assistance can vary from 20% (where a registrant pays 80% of normal dues) to 100% (where a registrant pays 0% of normal dues).

RDAP is available upon renewal only, it is not available on initial registration.

Table 4: RDAP usage by registration class

Registration class	2021 Renewal invoices issued	RDAP usage	RDAP usage as a percent of renewal invoices issued
Certified Human Resources Executive (CHRE)	262	8	3.1%
Certified Human Resources Leader (CHRL)	9,269	459	5.0%
Certified Human Resources Professional (CHRP)	5,272	338	6.4%
Practitioner	8,473	317	3.7%
Allied Professional	236	0	0.0%
Student	496	0	0.0%
Total	24,008	1,122	4.7%

- In 2021, 4.7% of renewing registrants participated in the RDAP.

For Table 5 below, for 2019 and before, the number of renewal invoices issued is an estimate.

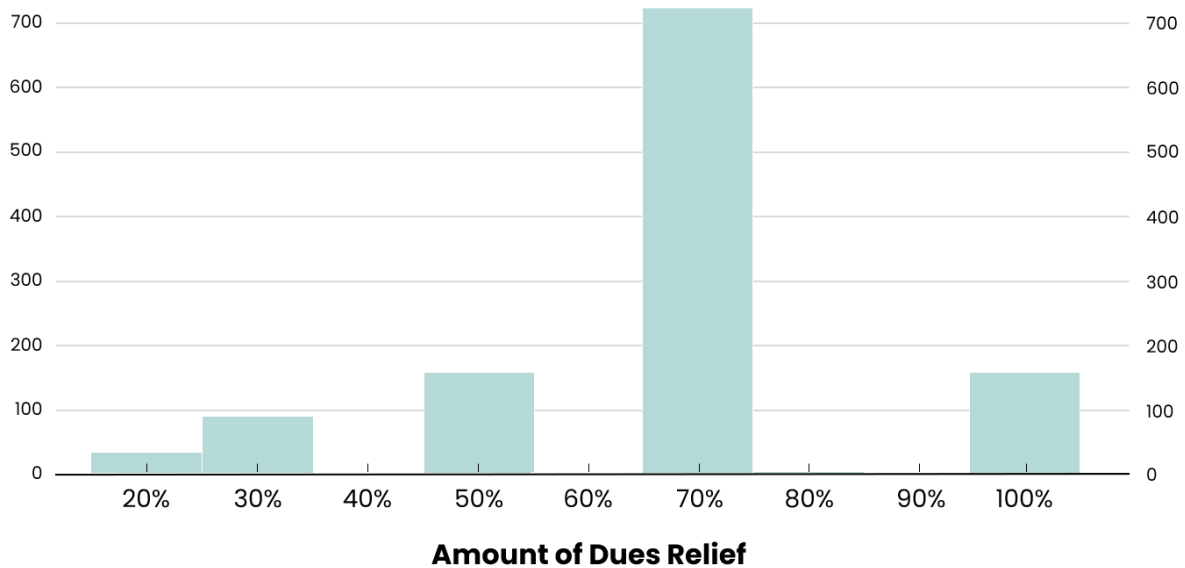
Table 5: Renewal dues assistance usage for last five years

	2017	2018	2019	2020	2021
Reduced dues Program	660	464	967	---	---
Member Disability Assistance Program (MDAP)	41	34	97	---	---
Renewal Dues Assistance Program (RDAP)	---	---	---	1,537	1,122
Total	701	498	1,064	1,537	1,122
Renewal invoices issued	24,628	24,642	24,240	24,175	24,008
Percentage of registration	2.8%	2.0%	4.4%	6.4%	4.7%

- It would appear that RDAP usage has returned to pre-pandemic levels.

As noted above, the amount of dues assistance can vary from 20% (where a registrant pays 80% of normal dues) to 100% (where a registrant pays 0% of normal dues). Figure 3, below, shows the distribution of amount of relief. The average amount of relief was 73.6% (which means that the average participant in the RDAP paid 26.4% of the full dues amount).

Figure 3: Amount of dues relief



Across all participants in RDAP, the total of full dues would have been \$476,300. With participation in RDAP, these registrants paid a total of \$166,526.

Retired registrants

The dues for retired members are set at \$100. In 2021, HRPAA had 268 retired members.

2021 Annual Report on Compliance

Although the term ‘compliance’ is the usual term used by professional regulatory bodies to refer to the degree to which registrants abide by the rules established by the professional regulatory body, it is an unfortunate choice of words. For some, the word ‘compliance’ brings to mind the idea of coercion, or of being forced to do something that one does not want to do. Perhaps a better word would be ‘adherence,’ as in ‘adherence to the rules established by the professional regulatory body.’

Professionals do not feel coerced into compliance when:

- The rationale for the rule is seen as reasonable and necessary,
- The regulated professional sees the professional regulatory body as legitimate, competent, and ethical,
- The regulated professional agrees that regulation is needed,
- The regulator can document the beneficial impact of such rules

For instance, most Canadians are accepting of facemask mandates. This is because most Canadians see the mandate as reasonable and necessary, that it is being mandated by legitimate, competent, and ethical authority, that leaving the wearing of facemasks to individuals would not be in the interest of the greater good, and that authorities can document the beneficial impact of facemask wearing.

Professional regulatory bodies simply cannot achieve their objectives by controlling the conduct and practice of the professionals they regulate. The only way professional regulatory bodies can reach their objectives is when professionals ‘*carry a bit of the professional regulatory body with them*’ whenever and wherever they practice the profession. For the most part, professional regulatory bodies are *influencers*, not *controllers*. In the end, regulated professionals are the implementors of practice standards. Compliance does not refer to the extent to which registrants ‘obey orders’ of their professional regulatory body, but the extent to which they have internalized the professional guidance issued by their professional regulatory body and applied this guidance in everyday professional practice.

This engagement with professional regulation acts as a multiplier. Practice guidance can only have an impact to the extent that it is put into effect by registrants.



There are three requirements for which the level of compliance is known or for which evidence can be used to estimate overall compliance with the requirement even without being able to ascertain whether individual members, firms, or students comply with the requirements. These are:

1. the CPD requirement,
2. the requirement to obtain and maintain professional liability insurance for registrants in independent practice and
3. the requirement to notify the Registrar of any insolvency event (i.e., bankruptcy or consumer proposal).

Professional Liability Insurance

The requirement for HRPAs registrants in independent practice to obtain professional liability insurance and to notify the Registrar of such has been in place since 2009. The Professional Liability Insurance Requirement requires:

1. That the registrant obtains Professional Liability Insurance
2. That the Registrant notify the Registrar that they have obtained Professional Liability Insurance
3. That this information is kept up to date

Estimating the actual Professional Liability Insurance compliance rate is relatively straightforward.

$$PLI \text{ compliance rate} = \frac{\text{Number of registrants authorized for independent practice on the public register}}{\text{Number of registrants subject to the PLI requirement}}$$

The numerator is simply the number of registrants who have complied with the Professional Liability Insurance Requirement. This is indicated in the public register as being “authorized for independent practice.” At the time of the survey, 614 registrants were authorized for independent practice on the public register.

The denominator is the number of HRPAs registrants in independent practice. Based on the Member and Student survey results, 7.9% of HRPAs respondents indicated that they were in independent practice and thus subject to the Professional Liability Insurance Requirement. With 23,958 registrants (at the time of the survey), one would estimate that 1,894 registrants to be in independent practice.

$$PLI \text{ compliance rate} = \frac{\text{Number of registrants approved for independent practice}}{\text{Expected number registrants in independent practice}} = \frac{543}{1,894} = 28.6\%$$

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Estimated PLI requirement adherence rate	22.0%	17.3%	26.4%	28.5%	38.3%	37.6%		32.4%	28.6%

The data were not available for 2019 because the question asking whether the respondent was in independent practice was not included in the Member and Student Survey that year.

As noted earlier in this Registrar’s Report the PLI compliance rate for registrants practicing through firms was 37.2% based on information supplied at registration or renewal.

Comparing actual compliance rate with self-reported compliance rate

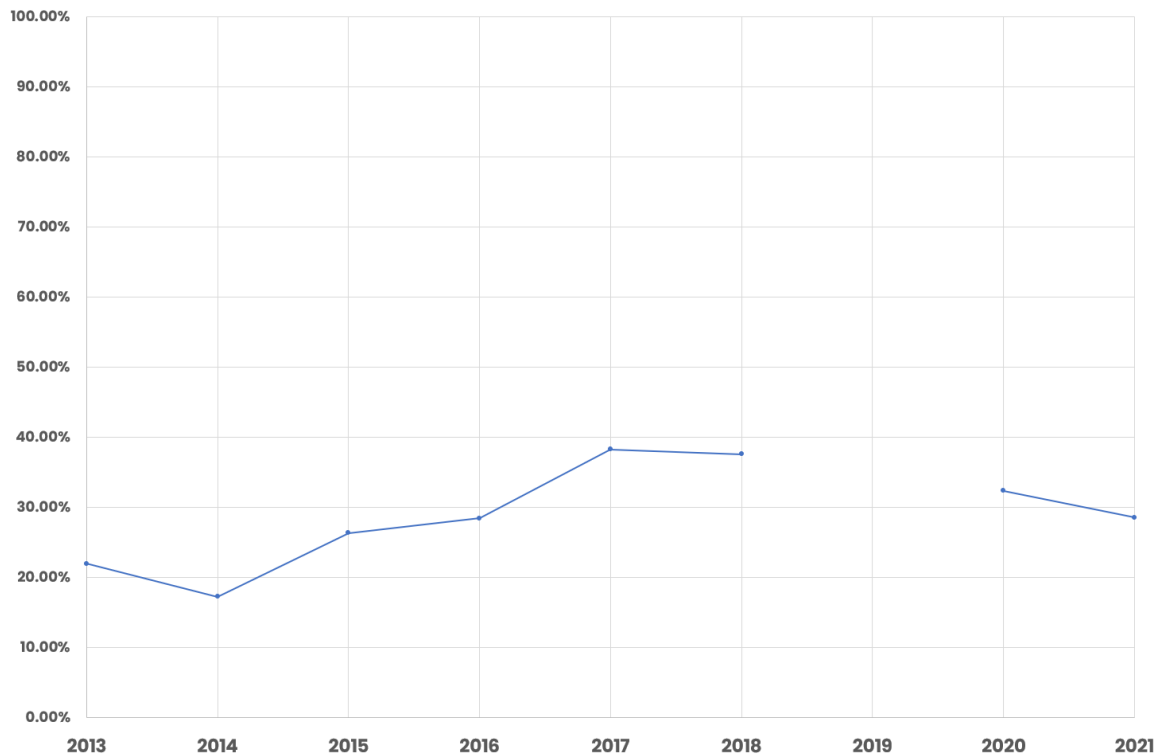
The Member and Student Survey asked whether respondents were in independent practice and whether they had obtained professional liability insurance. This provides an easy PLI compliance rate based on self-report.

$$PLI \text{ compliance rate } SR = \frac{\text{Number of respondent indicating that they have obtained PLI}}{\text{Number of respondents indicating that they are in independent practice}}$$

$$PLI \text{ compliance rate } SR = \frac{38}{54} = 70.3\%$$

70% of respondents that are in independent practice indicate that they are in compliance with the Professional Liability Insurance Requirement, but the actual compliance rate is closer to 32%. More on this discrepancy later.

**Adherence Rate for PLI Requirement
2013-2021**



Insolvency events

The requirement to notify the Registrar of any insolvency event is entrenched in the Act. The rationale for members to notify the Registrar of insolvency events is that there are additional risks to others stemming from the insolvency event. For instance, HR professionals often have broad access to corporate records, financial accounts, pension & benefit accounts, and payroll-related accounts—that broad access increases the possible risk to an employer should an HR professional be under intense financial pressure. Historical cases of fraud demonstrate the link between financial desperation and misconduct. HR professionals who have experienced an insolvency event may also find it difficult to maintain their independence and maybe improperly influenced by creditors³.

³ That is why, for instance, ‘bankrupts’ are not allowed to sit on HRP’s Board of Directors.

The compliance rate for the requirement to notify the Registrar of insolvency events is calculated as by dividing the actual number of notifications divided by the expected number of notifications.

$$\text{Insolvency event compliance rate} = \frac{\text{Actual number of notifications}}{\text{Expected number of notifications}}$$

In the last 12 months before the Member and Student Survey, there were 4 reports of insolvency events to the Registrar and 4 reports of insolvency events in the context of applications for registration (which are handled by the Registration Committee).

$$\text{Actual number of notifications} = 8$$

The expected number of notifications is calculated by taking the incidence rate for insolvency events in the general population and multiplying the number of members by this rate. Based on the data published by the Office of the Superintendent of Bankruptcies, the consumer insolvency rate in Ontario in 2020 was 2.9 per 1000.

$$\text{Expected number of notifications} = .0029 \times 23,414 = 67.90$$

Calculating the insolvency event compliance rate for 2021:

$$\text{Insolvency event compliance rate} = \frac{\text{Actual number of notifications}}{\text{Expected number of notifications}} = \frac{8}{68} = 11.8\%$$

Adherence Rate for the Requirement to Notify the Registrar of Insolvency Events

	2016	2017	2018	2019	2020	2021
% in population	0.36%	0.34%	0.34%	0.38%	0.34%	0.29%
Member count ⁴	20,842	21,445	21,273	23,085	23,768	23,414
Expected number of insolvencies	75	73	72	88	81	68
Actual number of notifications	n/a	3	10	2	2	8
Compliance rate	n/a	4.1%	13.9%	2.3%	2.5%	11.8%

Because the numbers are small, one would expect more variability in the estimated insolvency event compliance rate. One could argue that HRPAs members are, for some reason, less likely to experience an insolvency event than the general population. An interesting observation is that in the years 2016 to 2018, the insolvency rate amongst survey respondents was significantly *higher* than the insolvency rate for the Ontario general population aged 18 or over. There is no reason to believe that the insolvency rate amongst HRPAs members is less than that for the general population.

⁴ The requirement to notify the Registrar of any insolvency event applies only to members and not to students. The member count here does not include students. Also, the member count is taken as the member count on the day the survey was launched.

Comparing actual compliance rate with self-reported compliance rate

The Member and Student Survey asks the following question: *“If you were to experience a bankruptcy or insolvency event, would you notify the HRPAs Registrar as such, as required by our Act and By-laws?”* Based on the responses to this question, an 82.5% compliance rate would be expected.

Descriptor	Relative frequency	Assigned probability	Expected value
Definitely	57.4%	1.00	0.574
Probably	21.2%	.75	0.159
Maybe	5.7%	.5	0.0285
Don't know	10.5%	.5	0.0525
Probably not	4.2%	.25	0.0105
Definitely not	1.0%	.00	0
			.825

This means that registrants overestimate their compliance by a fair margin 82.5% based on self-report v. 11.8% actual compliance rate. Members say that they would likely notify the Registrar of an insolvency should they experience such an event, but in actuality they are unlikely to do so when they do experience such an event.

On the other hand, compliance with the CPD requirement

The compliance rates for the requirement to notify the Registrar of insolvency events (11.8%) and the requirement for registrants in independent practice to obtain professional liability insurance and to notify the registrar of such (28.6%) stand in contrast to the compliance rate for the Continuing Professional Development requirement (95%).

This suggests the conditions under which compliance will be high:

1. That one is subject to the CPD requirement is easily established
2. Whether one has complied with the requirement is easily established
3. The consequences are significant and enforced

Unfortunately, for other requirements such as the requirement to obtain Professional Liability Insurance and the requirement to notify the Registrar of insolvency events, identification depends on self-report.

It is difficult to know that a registrant is in independent practice if the registrant does not notify HRPAs that this is the case. Similarly, it is difficult to know that a registrant has experienced an insolvency event if the registrant does not notify HRPAs that this is the case.

Self-reports of compliance overestimate actual compliance by a fair margin

Adherence rates based on self-report v. compliance rates based on evidence

	Compliance rate based on self-report	Compliance rate based on data
Reporting of insolvency events	82.5%	11.8%
Obtaining PLI and notifying the Registrar of such	70.3%	32.4%

There are likely many reasons for the discrepancy between self-reports of compliance and actual compliance.

For instance, regarding the requirement for members to notify the Registrar of any insolvency event, we are dealing with an event which, for most respondents, has not happened—it is a hypothetical event. It may be that individuals simply do not have a good idea as to how they would act if this were to happen to them.

This does not explain the overestimation of actual compliance for the Professional Liability Insurance Requirement, however. Here, one explanation might be that survey respondents were not comfortable in admitting that they were not in compliance with the Professional Liability Insurance Requirement, even though the survey was anonymous.

This does suggest that self-reports of compliance cannot be taken as evidence for compliance.

Some implications

Compliance rates are very low, at least when no means of monitoring are available

One implication of the above is that one cannot assume that registrants will comply with a requirement unless there is a means of verification.

Sometimes, professional regulation is about getting professionals to do certain things in service of keeping the public safe that they would not necessarily do on their own. If professional regulatory bodies only asked professionals to do what they would have already done, there would be no need for a professional regulatory body. But that does not mean that this must be perceived as an imposition or a burden.

In situations where there is a significant risk to the public, and to the extent possible, verification mechanisms must be included in any initiative. However, HRP A will not be able to achieve acceptable levels of compliance through enforcement, the only solution is to develop a culture of compliance or 'good professional citizenship'. The idea is that whether one agrees with a particular rule or requirement, one complies out of respect for one's professional regulatory body or out of respect for the profession.



Regulatory activity coordination and policy formulation

The Policy Team continues to actively work on the shift towards risk-based regulation, reforming HRPAs CPD requirements, and several other projects.

Q4 Highlights:

- Risk-based regulation practice tool update for Q4, with some substantial improvements from the initial Q1 assessment.
- HRPAs hosted a conference session at CNAR, detailing our process with shifting to Risk-Based Regulation.
- Webinar presented to HRPAs registrants regarding HRPAs shift to Risk-Based Regulation.
- Finalized draft of Reinstatement and Re-Achievement Policy and sent to the Professional Standards Committee (PSC) for feedback/approval to move to the Governance and Nominating Committee.
- Risk-management framework drafted, with details on how HRPAs will regularly maintain its risk roster.
- CPD external consultations plan was developed, and execution began in Q4:
 - CPD Committee was invited to provide their feedback on the proposed CPD framework.
 - Members and students were invited to provide their feedback on the proposed CPD framework.
- An issue brief was developed for domestic violence in the workplace.
- An environmental scan of practice inspections was done in Q4.

CNAR Conference

This quarter, the Policy Team presented at the CNAR conference on October 14, 2021, for a one-hour session, with the official session titled *“Preventing Risks to the Public Before They Happen: Practical Tools for Risk-Based Regulators.”* It appears the session was well-received from attendees, and practical tools and resources were shared with other regulators.

Risk-Based Regulation Webinar for Registrants

The Policy Team, similar to the presentation at the CNAR conference, hosted a webinar for registrants about HRPAs shift to Risk-Based Regulation on November 24, 2021. Registrants learned what risk-based regulation is, the importance of partnership between HRPAs and registrants to identify and mitigate risks of harm to the public, what some of the top risks are that are posed by the practice of HR, and how we developed the risk roster. This webinar helped serve as an introduction to registrants, with much more education and resources to come in 2022 and beyond.

Domestic Violence in the Workplace Issue Brief

Following a request from the Coroner's office for HRPAs to provide guidance on the subject of domestic violence in the workplace, HRPAs directed the policy team to begin with a briefing note on the subject. The briefing note outlines domestic violence legislation that impacts workplaces and discusses deficiencies in the research about effective policies regarding domestic violence in the workplace.

Environmental Scan on Practice Inspections

An environment scan was done in Q4 for practice inspection programs in Ontario. Both health and non-health regulators were scanned for information such as what the legislation says, how members are selected for inspections, who does the inspection, and the process of inspections. The primary difference between health and non-health regulators is the mandatory nature of practice inspections for health regulators versus legislation that permits practice inspection for non-health regulators.

Regulatory operations

Regulatory operations refer to the day-to-day workings of HRPAs regulatory committees and Office of the Registrar staff.



Regulatory committees have no control over the volume of applications, complaints, or referrals. These volumes can fluctuate significantly. For professional regulatory committees, performance is measured by (1) the timely disposition of cases, and (2) the quality of the decisions. The latter can be assessed by the number of appeals which have overturned any decisions of the committee. The following is an overall assessment of committee performance – more details for each committee can be found below.

Regulatory committee performance overview

	Keeping up with referrals	No backlog	Decisions rendered in a timely manner	Decisions are upheld upon appeal
Registration Committee	●	●	●	●
Academic Standards (Diploma) Committee	●	●	●	●
Academic Standards (Degree) Committee	●	●	●	●
Experience Assessment Committee (Alternate Route)	●	●	●	●
Experience Assessment Committee (VOE Route)	●	●	●	●
CHRE Review Committee	●	●	●	●
Continuing Professional Development Committee	●	●	●	●
Complaints Committee	●	●	●	●
Discipline Committee	●	●	●	●
Capacity Committee	●	●	●	●
Review Committee	●	●	●	●
Appeal Committee	●	●	●	*

*Decisions of the Appeal Committee cannot be appealed within HRP. Decisions of the Appeal Committee are subject to judicial review by Divisional Court. To date, no decision which has been reviewed by HRP's Appeal Committee has been brought to Divisional Court.



Registration and certification

The purpose of the registration and designations functions is to ensure that only competent and ethical professionals are registered and certified by HRP.

Registration

HRPA is unique amongst professional regulatory bodies in Ontario in that it registers non-designated individuals. These individuals are registered in the Practitioner registration class.

Q4 Highlights:

- The Registration Committee wrapped up the quarter with a year end business meeting on November 25, 2021.
- HRP received 571 registration applications. This includes both initial registration as a member and as a student.
- 18 registration applications were flagged for review by the Registration Committee due to a positive response to a good character question.
- In total, four cases were disposed of by the Registration Committee in Q4, out of which four applications were approved, one was approved with terms and conditions.
- The Associate Registrar approved five applications for registration.
- There are currently eight applications that are in the information gathering stage with the review taking place in Q1 2022 and two individuals withdrew their application for registration.
- In total, 571 applicants were approved for registration and added to the public register in Q4 2021.

Registration Committee

Chair: Agnes Ciesla, CHRP, CHRL

Vice-Chair: Cindy Zarnett, CHRP, CHRL

Staff Support: Melissa Gouveia

Independent Legal Counsel: Stephen Ronan, Lerner LLP

Not all applications for initial registration with HRP are automatically accepted. HRP has a *good character* requirement that all applicants for initial registration must meet.

The Registration Committee is a standing committee established under Section 8.04 of the By-laws to review every application referred to it by the Registrar. The Registration Committee makes two kinds of decisions:

- a. Determining the suitability of an applicant for registration or the appropriateness of the category of registration being applied for.
- b. Considering applications for removal or modification of any term, condition or limitation previously imposed on a registrant's registration with HRP.

The Registration Committee does not have the authority to deem that an applicant has met the requirements for registration where the registration requirement is prescribed as non-exemptible.

Less than 1% of applications indicate some event that would require further review.

Registration Committee Activity*

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Referral to Associate Registrar/Registration Committee	24	18	13	21	22	9	65
Approved for registration	16	20	12	13	13	9	47
Approved with conditions	2	0	2	1	3	1	7
Awaiting Panel Review	0	0	1	2	4	0	7
Awaiting supporting documentation	0	0	0	5	3	8	16
Withdrew application	0	2	2	1	2	2	7
Not approved	6	3	0	1	0	0	1

*The table above gives the activity and decisions of the Registration Committee in Q4 2021. It is to be noted that the numbers are a bit different than those related in Q4 Highlights because they include applications for initial registration which were received before Q4.

Initial Registration in Q4 2021

	Count	Percent
New registrations as a member	456	80%
New registrations as a student	115	20%
Total new registrations	571	100%

New Registrant Jurisdiction Q4 2021

	Count	Percent
Ontario	539	94%
International	12	<1%
Alberta	6	< 1%
British Columbia	1	< 1%
Newfoundland	1	< 1%
Nova Scotia	2	< 1%
Prince Edward Island	1	< 1%
Quebec	6	< 1%
Saskatchewan	1	< 1%
Yukon	2	< 1%
Total	571	100%

Not surprisingly 94% of initial registrations are from Ontario. Interestingly, initial registrations from out of Canada are about equal to initial registrations from other Canadian provinces.

Registration of Individuals Previously Registered with HRP

	Count	Percent
Previously registered with HRP	14	<1%
Not previously registered with HRP	557	99%
Total new registrations	571	100%

Less than 1% of new registrations were from individuals previously registered with HRP but who had resigned or had been revoked for failure to renew their registration with HRP. These individuals must reapply for registration as new registrants.

Registration of Firms

The registration of firms has not yet been put into force.

Designations

HRP offers three designations - the Certified Human Resources Professional (CHRP), the Certified Human Resources Leader (CHRL) and the Certified Human Resources Executive (CHRE).

Course Approval

The CHRP and the CHRL have a coursework requirement. The coursework is approved by the Academic Standards Committees. There is an Academic Standards Committee for diploma-level coursework and an Academic Standards Committee for degree-level coursework.

The Academic Standards Committees (Diploma and Degree) make two kinds of decisions:

- a. Reviewing course information from academic institutions for inclusion on HRP's list of approved courses in fulfillment of HRP's coursework requirement,
- b. Reviewing course information for courses not included on HRP's list of approved courses on an individual basis in fulfillment of HRP's coursework requirement.

Applications for course approval can be submitted by academic institutions or individuals.

Individuals with coursework that has not been approved by HRP or that was completed outside of Ontario can apply to have their coursework approved in fulfillment of HRP's coursework requirement. This is done on a course-by-course basis.

For courses taken outside of Canada, we do require an original equivalency report from WES, ICAS or CES to confirm the institution is accredited and the level of the coursework.

Courses offered within programs under one of the standards (50223, 60223, and 70223) are approved and do not need to be reviewed by the Academic Standards Committee - Diploma. This has reduced the volume of submissions by institutions since 2017, when this was first introduced, and in Q4 there were eight Ministry-approved non-degree HR courses, which were approved by staff using this process.

Academic Standards (Diploma) Committee

Chair: Michelle White, CHRL

Vice-Chair: TBD

Staff Support: Melanie Liu

The Academic Standards (Diploma) Committee reviews all non-degree coursework (diploma, advanced diploma, post-diploma certificate, and not-for-credit coursework).

The standards for programs offered by colleges (i.e., Colleges of Applied Arts and Technology) are set by the Ministry of Colleges and Universities.

50223	The approved program standard for Business – Human Resources program of instruction leading to an Ontario College Diploma delivered by Ontario Colleges of Applied Arts and Technology
60223	The approved program standard for Business Administration – Human Resources program of instruction leading to an Ontario College Advanced Diploma delivered by Ontario Colleges of Applied Arts and Technology
70223	The approved program standard for Human Resources Management program of instruction leading to an Ontario College Graduate Certificate delivered by Ontario Colleges of Applied Arts and Technology

Although the Ministry approved program standards are not the same as HRPAs' course standards, to avoid duplication, courses offered within programs under one of the standards above will be approved and do not need to be reviewed by the Academic Standards (Diploma) Committee.

Institutional courses with Ministry approval

	2020	2021				2021
	Total	Q1	Q2	Q3	Q4	Total
Institutional courses with Ministry approval	18	3	7	9	8	27

Reviews of institutional applications without Ministry approval by the Academic Standards (Diploma) Committee

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Institutional applications reviewed	9	0	3	0	0	0	3
Institutional applications approved	9	0	0	3	0	0	3

Reviews of individual applications by the Academic Standards (Diploma) Committee

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Individual applications reviewed	3	9	0	0	0	0	0
Individual applications approved	1	9	0	0	0	0	0

Academic Standards (Degree) Committee

Chair: Julie Aitken Schermer, PhD, (member of the public)

Vice-Chair: Kate Toth, PhD, CHRP, CHRL

Staff Support: Melanie Liu

The Academic Standards (Degree) Committee reviews all degree-credit coursework. University courses are reviewed for an 80% match with HRPAs standard course outlines.

Reviews of institutional applications by the Academic Standards (Degree) Committee

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Institutional applications reviewed	45	24	1	1	3	1	6
Institutional applications approved	20	18	0	2	0	1	3

Reviews of individual applications by the Academic Standards (Degree) Committee

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Individual applications reviewed	36	46	17	5	9	1	32
Individual applications approved	11	15	0	16	9	1	26

Challenge Exams

For each of the nine required courses, candidates may opt to write a Challenge Exam. Some use the Challenge Exam option instead of taking the course, others use the Challenge Exams to make up for a grade that was too low or for a course that has expired due to it having been completed more than 10 years ago.

- Challenge Exams were held from September 13th – 15th, 2021.
- There were 67 Challenge Exams registered for the September 2021 administration.

Challenge Exams Breakdown by Month

Month	Registrants	Pass	Pass Rate
January 2021	71	48	68%
May 2021	77	51	66%
September 2021	67	43	64%
Total	215	142	

Challenge Exams Breakdown by Subject for the September 2021 Administration

Subject	Registrants	Pass	Pass Rate
Training and Development	9	8	89%
Compensation	8	4	50%
Organizational Behaviour	9	6	67%
Finance and Accounting	4	3	75%
Recruitment and Selection	8	5	63%
Human Resources Management	6	6	100%
Human Resources Planning	8	3	38%
Occupational Health and Safety	5	4	80%
Labour Relations	10	4	40%
Total	67	43	64%

Experience Requirement and Alternate Route

Experience Assessment Committee

Chair: Michelle Rathwell, CHRP, CHRL

Vice-Chair: Elizabeth Blunden, CHRP, CHRL

Staff Support: Arianne Andres

The Experience Assessment Committee is a standing committee established under Section 8.04 of the By-laws to review every application referred to it by the Registrar. The Experience Assessment Committee makes two kinds of decisions:

- a. Determining the appropriateness and adequacy of the experience of each applicant to meet the experience requirement for the Certified Human Resources Leader (CHRL) designation.
- b. Determining the appropriateness and adequacy of the experience of each applicant to meet the coursework requirement for the Certified Human Resources Professional (CHRP) or the CHRL designation via the Alternate Route per the criteria as established by the Board.

Q4 Highlights:

- The Experience Assessment Committee wrapped up the quarter with their year end business meeting on November 29, 2021.
- The volume of Validation of Experience applications and Alternate Route applications seems to be comparable to the number of applications pre-COVID, in 2019.

Experience Assessment Committee Activity (Validation of Experience)

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Validation of Experience applications received	256	163	69	60	57	80	266

Validation of Experience Results Released for Q4 2021

	Count	Percent
Successful	39	72.2%
Unsuccessful	15	27.8%
Total	54	100%

Alternate Route

Experience Assessment Committee Activity (Alternate Route)

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Alternate Route applications received	126	129	28	36	27	21	112

Alternate Route Results Released for Q4 2021

	Count	Percent
Successful	17	63%
Unsuccessful	10	37%
Total	27	100%

Designation Exams

Q4 Highlights:

HRPA continues to experience a strong number of candidates writing the CHRP Knowledge Exams (CHRP-KE) and the CHRL Knowledge Exams (CHRL-KE), as well as the CHRP and CHRL Employment Law Exams (CHRP and CHRL-ELE) in Q4. The CHRP requires successful performance on the CHRP Knowledge Exam (CHRP-KE) and the CHRP Employment Law Exam (CHRP-ELE). The CHRL requires successful performance on the CHRL Knowledge Exam (CHRL-KE) and the CHRL Employment Law Exam (CHRL-ELE).

The development and validation of certification exams is a complex process for which the input of members of the profession is essential. The CHRP Exam Validation Committee performs this role for the CHRP exams (the CHRP-KE and CHRP-ELE), and the CHRL Exam Validation Committee performs this role for the CHRL exams (the CHRL-KE and CHRL-ELE).

Q4 2021 Exam Schedule

Exam	Window
CHRP-KE	October 19 - November 2, 2021
CHRL-KE	November 2 - 16, 2021
CHRP-ELE	September 14 - 28, 2021
CHRL-ELE	September 21 - October 5, 2021

2021 CHRP Knowledge Exam

Administration window	Number of candidates	Pass rate for first time writers	Overall pass rate	Reliability
February 8 – 24, 2021	316	74.6%	67.4%	.90
June 7 – 21, 2021	342	72.7%	65.5%	.91
October 19 – November 2, 2021	394	70.5%	62.4%	.90
Total	1052	72.4%	64.9%	.90

2021 CHRP Employment Law Exam

Administration window	Number of candidates	Pass rate for first time writers	Overall pass rate	Reliability
January 4- 18, 2021	89	98.7%	95.5%	.84
May 17 – June 4, 2021	204	98.0%	98.0%	.85
September 14-28, 2021	175	96.0%	96.5%	.84
Total	468	97.4%	97.0%	.84

2021 CHRL Knowledge Exam

Administration window	Number of candidates	Pass rate for first time writers	Overall pass rate	Reliability
March 1 – 15, 2021	310	75.6%	66.5%	.92
June 28 -July 12, 2021	314	76.6%	68.5%	.92
November 2 – 16, 2021	304	74.4%	65.8%	.93
Total	928	75.5%	66.9%	.92

2021 CHRL Employment Law Exam

Administration window	Number of candidates	Pass rate for first time writers	Overall pass rate	Reliability
January 11 – 25, 2021	158	95.2%	91.1%	.85
May 25 – June 9, 2021	248	91.7%	91.5%	.84
September 21 – October 5, 2021	248	89.2%	85.8%	.84
Total	654	91.6%	89.2%	.84

	2016	2017	2018	2019	2020	2021
CHRP Knowledge exam	911	504	598	607	522	1,052
CHRL Knowledge exams	957	642	762	763	598	928
CHRP Employment Law Exam	246	414	358	415	459	468
CHRL Employment Law Exam	293	466	528	609	601	654
Total	2,407	2,026	2,246	2,394	2,180	3,102

Obviously, 2021 was a good year for exams, but was it just a rebound from 2020 because of the COVID pandemic? One approach is to take the average of 2020 and 2021 and compare this average value to 2019.

	2019	2020-2021 average	% difference
CHRP Knowledge exam	607	787	+29.7%
CHRL Knowledge exams	763	763	+0.0%
CHRP Employment Law Exam	415	463.5	+11.7%
CHRL Employment Law Exam	609	627.5	+3.0%
Total	2,394	2641	+10.3%

This analysis would suggest that there has been a real increase in the number of candidates writing the CHRP exams, whereas the number of candidates writing the CHRL exams are stable.

CHRP Exam Validation Committee

Chair: Claire Chester, CHRL

Vice-Chair: Roxanne Chartand, CHRL

Staff Support: Kelly Morris, CHRP, CHRL

The Certified Human Resource Professional Exam Validation Committee (CHRP-EVC) is a standing committee established under the By-laws to:

- a. Approve all examination content used to evaluate CHRP candidates and make recommendations to the Registrar as to appropriate cut-scores for the CHRP exams.
- b. Approve examination blueprints for the CHRP-KE and CHRP-ELE.

In Q4, the CHRP-EVC held the following exam related activities:

- A CHRP-KE Key Validation and Pass Mark Approval session was held in November of 2021.
- A CHRP-ELE Key Validation and Pass Mark Approval session was held in October of 2021.
- A CHRP-ELE Form Approval session was held in October of 2021.
- A two-day CHRP-ELE Validation sessions was held in September of 2021.
- Roxanne Chartrand was elected as Vice-Chair in October of 2021.
- A meeting with the Chairs of both the CHRP and the CHRL-EVC was held in November of 2021.

The purpose of the Key Validation and Pass Mark Approval sessions is to obtain an agreement on the items that are appropriate for scoring and an agreement as to the appropriateness of the pass mark

and pass rate for the CHRP Employment Law Exam written in September of 2021 and for the CHRP Knowledge Exam written in October - November of 2021. The CHRP-EVC makes a recommendation to the Registrar to approve the agreed-upon pass mark. The purpose of the Form Approval session is to ensure that the final form of the exam does not contain any enemy items and receives one last review before it is administered to candidates. The purpose of the Validation sessions is to review and validate items for future sittings of the CHRP Employment Law Exam. All items were validated by the CHRP-EVC and the committee members were confident that the validated items would form a defensible exam. The Validation sessions were held over two days in September and were done virtually due to COVID-19.

CHRL Exam Validation Committee

Chair: Nancy Richard, CHRL

Staff Support: Kelly Morris, CHRP, CHRL

The Certified Human Resource Leader Exam Validation Committee (CHRL-EVC) is a standing committee established under the By-laws to:

- a. Approve all examination content used to evaluate CHRL candidates and make recommendations to the Registrar as to appropriate cut-scores for the CHRL exams.
- b. Approve examination blueprints for the CHRL-KE and the CHRL Employment Law Exams.

In Q4, the CHRL-EVC was very busy and held the following exam related activities:

- The CHRL-KE Key Validation and Pass Mark Approval session was held in November of 2021.
- The CHRL-ELE Key Validation and Pass Mark approval session was held in October of 2021.
- The CHRL-ELE Form Approval was held in October of 2021.
- A two-day CHRL-ELE Validation sessions was held in September of 2021.
- A meeting with the Chairs of both the CHRP and the CHRL-EVC was held in November of 2021.

The purpose of the Key Validation and Pass Mark Approval sessions is to obtain an agreement on the items that are appropriate for scoring and an agreement as to the appropriateness of the pass mark and pass rate for the CHRL Employment Law Exam written in September of 2021 and for CHRL Knowledge Exam written in November of 2021. The CHRL-EVC makes a recommendation to the Registrar to approve the agreed-upon pass mark. The purpose of the Form Approval session is to ensure that the final form of the exam does not contain any enemy items and receives one last review before it is administered to candidates. The purpose of the Validation sessions is to review and validate items for future sittings of the CHRL Employment Law Exam. All items were validated by the CHRL-EVC and the committee members were confident that the validated items would form a defensible exam. The Validation sessions were held over two days in September and were done virtually due to COVID-19.

Technical Reports for Exams

HRPA publishes the technical reports for the CHRP-KE, CHRL-KE, CHRP and CHRL Employment Law Exams for each administration (e.g., exam window) of the exams. There were four technical reports published in Q4 2021.

- The CHRP Employment Law Exam – [September 2021](#)
- The CHRL Employment Law Exam – [September – October 2021](#)
- The CHRP Knowledge Exam – [October – November 2021](#)
- The CHRL Knowledge Exam – [November 2021](#)

Examination Accommodations

HRPA's Examination Accommodations Policy identifies to candidates what types of documentation is required when submitting their request for accommodations and explains and defines what disabilities may be. Accommodated candidates are provided with a detailed step-by-step guide on what to expect during the process of reviewing and approving their requests. HRPA has also implemented the Examination Accommodation Request Form, as well as an Acknowledgement of the Accommodations Provided form so that each candidate is made aware of the accommodations that HRPA has approved to be implemented.

In Q4, we implemented a complex accommodation request with the assistance of our complex accommodation expert, Paradigm Testing. The candidate was writing the CHRP-KE and required a virtual reader. This solution was implemented successfully.

In Q4, we successfully delivered one French exam for the CHRL-KE.

In Q4, the HRPA reviewed and approved a total of 21 accommodation requests for the CHRP and CHRL Knowledge Exam and for the CHRP and CHRL Employment Law Exam.

The types of accommodations requested include:

- Additional time
- Flexible breaks (stop-the-clock breaks)
- Medical devices including glucose monitor and insulin pump
- Earplugs
- Glucose monitor using a smart phone
- Desktop whiteboard in the remote environment
- Snacks, drinks, and medication available to test-taker while taking their exam
- Ability to read out loud
- Virtual reader
- Scrap paper in the remote environment

Job Ready Program

Completion of the Job Ready Program is required to earn the CHRP designation. The Job Ready Program is not graded but must be completed.

Between September 1, 2021 and November 30, 2021, 273 registrants completed the Job Ready Program and were granted the CHRP designation.

CHRE Review Committee

Chair: Dennis Concordia, CHRE
Vice-Chair: Janet Brooks, CHRL, CHRE
Staff Support: Margaret Wilson, CHRP, CHRL

The CHRE Review Committee is a standing committee established under Section 8.04 of the By-laws to review every application referred to it by the Registrar to determine whether an applicant meets the criteria for the Certified Human Resources Executive (CHRE) as established by the Board.

Q4 Highlights:

- At the end of Q4, 253 members held the CHRE designation.
- Three CHRE applications were reviewed by the CHRE Review Committee in Q4; one was submitted at the end of Q3 and two were submitted in Q4. One was successful and two were unsuccessful.
- The pass-rate increased in 2021 when in comparison to 2020; in 2020 it was 17.9% and in 2021 it was 45%.

CHRE Review Committee Activity

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Applications referred to Committee	87	39	11	11	6	3	31
Designation granted by Committee	14	7	5	3	5	1	14

The average time from HRP A receiving a CHRE application to a decision being released was 23 days in Q4.

Issuance of certificates

Certificates are issued for all three levels of designation: CHRP, CHRL, and CHRE. In Q4 certificates issuance commenced in mid-November, and members are scheduled to receive their certificates in December. An email went out to 341 members notifying them that they could expect to receive their certificate during this issuance.

Certificates Issued in 2021

	CHRP	CHRL	CHRE	Total
February 2021 (Q1) deferred to April 2021 (Q2)	530	102	8	640
May 2021 (Q2)	222	68	5	295
August 2021 (Q3)	318	56	4	378
November 2021 (Q4)	273	65	3	341
Total	1,343	291	20	1,654



Standards and guidance

- The revised Rules of Professional Conduct and Code of Ethics were reviewed by three diversity and inclusion experts. This was the last round of stakeholder consultations, and the revised Rules of Professional Conduct and Code of Ethics will be presented to the Professional Standards Committee early in 2022.
- Four practice guidance documents are in the final stages and will likely be submitted to the Governance and Nominating Committee for approval in December 2021: Social Media Use Guideline, Mental Health in the Workplace Guideline, Terminations Checklist and Workplace Investigations Standard.
- A fifth guideline on Racism in the Workplace has been drafted with the assistance of three diversity and inclusion experts. It will be submitted to the Professional Standards Committee in spring 2022.
- An environmental scan and report regarding the rejoining provisions of all regulatory bodies in Ontario has been completed. The findings have been used to develop a set of recommendations to revise HRPAs' Reinstatement & Re-Achievement Policy to ensure it provides for more flexibility for returning CHRP and/or CHRL members, while also maintaining the protection of the public.

Professional Standards Committee (PSC)

The Professional Standards Committee held a meeting on October 19, 2021. The main focus of the meeting was two guidance documents that had been submitted to the committee for review and feedback – the Terminations Checklist and the Workplace Investigations Standard. Both documents were well received by the Committee. Following the meeting, volunteers from within the Committee worked with the policy team to revise the two guidance documents based on the feedback that was provided by the Committee members. Additionally, scenarios were also added to both guidance documents to show their practical application.

The policy team also worked with volunteers from the Committee to review scenarios that had been added to the Social Media Use Guideline and the Mental Health in the Workplace Guideline.

All four guidance documents have now been resubmitted to the Professional Standards Committee for a final look. Pending approval, they will be submitted to the Governance and Nominating Committee in December 2022 for its approval.

In addition to the guidance documents, the Professional Standards Committee is also reviewing a set of recommendations made by the policy team with respect to revising HRPAs' Reinstatement & Re-Achievement Policy. The recommendations would make it easier for former members who held the Certified Human Resources Professional (CHRP) and/or the Certified Human Resources Leader (CHRL) designation to return to HRPAs and reobtain their designation, while at the same time maintaining the same standards for the designations for all applicants and providing adequate protection of the public.



Quality assurance

Continuing Professional Development Committee

Chair: Serenela Felea, CHRP, CHRL

Vice-Chair: Sarah Bhairo, CHRP, CHRL

Staff Support: Danielle Elvikis

The Continuing Professional Development (CPD) Committee is a standing committee established under Section 8.04 of the By-laws to audit every continuing professional development log referred to it by the Registrar. The CPD Committee makes two kinds of decisions:

- a. Determining whether the continuing professional development requirement has been met per the criteria as established by the Board.
- b. Reviewing every extension request for a member's continuing professional development period referred to it by the Registrar to determine whether there are valid grounds to grant an extension per the Continuing Professional Development Extension Policy.

Q4 Highlights:

This year there was a larger cohort for CPD log submissions due to the changes to the designation framework on October 29, 2014, whereby CHRP Candidates were granted the CHRP designation, and as such were required to submit a CPD log every three years. In Q1 there were 5,627 designated registrants due to submit their CPD log by May 31, 2021. Of those, 4,971 designated registrants submitted their CPD log as of October 1, 2021. 124 members were revoked for non-renewal and CPD non-compliance, 163 moved to Practitioner, 214 were granted an extension and 155 either resigned or retired.

Continuing Professional Development (CPD) Log Submissions

	2019	2020	2021*				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
CPD logs due to be submitted	4,173	3,500	5,627	5,339	5,275	5,258	5,258
CPD logs submitted	3,419	2,920	865	4,636	4,971	4,971	4,971

*Due to an increase in CPD extension requests, retired status, and resignations during Q4, the number of CPD logs due to be submitted was revised.

CPD 2021 Audit

A total of 178 designated registrants were randomly selected for the CPD audit and were notified via email on March 31, 2021. Of the 178 members selected for the audit, 144 members complied with the initial audit request:

- 133 members passed the audit
- 27 members were granted an extension for the audit
- 3 members retired
- 1 member resigned
- 14 members did not submit their audit documents and are CPD audit non-compliant

The audit review occurred virtually this year, due to the pandemic, using an online submission platform. Staff support conducted the necessary follow up on the submissions that required additional information to finalize the audit review. The CPD Committee grants staff support authorization to finalize the submissions, provided that the member submits the requested information noted on the audit summary, specifically. The audit concluded on November 15, 2021.

CPD Pre-Approval

In Q4, a total of 598 events were pre-approved for CPD credit. The events can be broken down into four categories:

- HRPAs Chapters
- HRPAs Professional Development Department
- HRPAs Summer Conference
- Third-Party Contract and Program Providers



Complaints, discipline, capacity and review

Complaints Committee

Chair: Jennifer Cooper, LL. B (member of the public)

Vice-Chair: Michael Burokas, JD (member of the public)

Staff Support: Jenny Eum

Independent Legal Counsel: Lonny Rosen, C.S., Rosen Sunshine LLP

The Complaints Committee is a statutory committee established under Section 12 of the *Registered Human Resources Professionals Act, 2013* (the "Act") and the By-laws to every complaint referred to it under Section 31 of the Act and section 15.03 of the By-laws. If the complaint contains information suggesting that the member, student or firm subject to the complaint may be guilty of professional misconduct as defined in the by-laws, the committee shall investigate the matter. Following the investigation of a complaint, the Complaints Committee may:

- direct that the matter be referred, in whole or in part, to the Discipline Committee;
- direct that the matter not to be referred to the Discipline Committee;
- negotiate a settlement agreement between the Association and the member, student or firm and refer the agreement to the Discipline Committee for approval;
- or take any action that it considers appropriate in the circumstances and that is not inconsistent with the Act or the By-laws, including cautioning or admonishing the member, firm, or student.

Q4 Highlights:

- One decision was issued in Q4.
- One new complaint was registered in Q4.
- The Complaints Committee closed out 2021 with 13 cases. This is comparable to the number of complaints pre-COVID, in 2019 (12 cases) and in 2018 (14 cases).

HRPA Complaint Rate for Last Four Years

Year	Registration at end of period	Number of Complaints	Complaint Rate per 1000 Registrants
2021	22,970	13	0.57
2020	21,957	9	0.41
2019	22,757	12	0.53
2018	22,334	14	0.62

Summary of Complaints Activity

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Referrals to Complaints Committee	12	9	0	7	5	1	13
Decision issued by Complaints Committee	12	2	2	2	3	1	8
Average time to dispose of complaint (days)	157	154	143	185	137	148	153

There was one referral to the Complaints Committee in Q4, of which is currently in the information gathering stage. Details of this referral is listed below:

Complaints Referred in Q4 2021

Case	Date complaint filed	Nature of allegations	Date of disposition of complaint and decision of Complaints Committee
C-2021-13	September 10, 2021	It is alleged that the member breached the following Rules of Professional Conduct: Chapter II, Division II, Section V 1) retaliate in any way against employees that are exercising their right to launch a complaint or grievance; (2) Knowingly participate in or condone any act of retaliation on the part of the organization that employs them or to which they are providing service against employees who are exercising their right to launch a complaint or grievance.	TBD

One complaint was disposed of in Q4, please refer to the table below for details.

Complaints Disposed of in Q4 2021

Case	Date complaint filed	Nature of allegations	Date of disposition of complaint and decision of Complaints Committee
C-2021-9	June 10, 2021	It is alleged that the member breached the following Rules of Professional Conduct: Division II 1. A registrant shall not act in a manner that is dishonest, fraudulent, criminal, or illegal, or with the intent of circumventing the law. Division III	November 5, 2021 No referral to Discipline. Letter of Expectation Issued.

		<p>4. Under no circumstances, in the practice of Human Resources Management, shall a registrant engage in, or condone: (1) any acts of harassment or intimidation. (2) any acts of physical or psychological violence. (3) any acts of discrimination on the grounds of age, ancestry, colour, race, citizenship, ethnic origin, creed, disability, family status, marital status (including single status), gender identity, gender expression, receipt of public assistance (in housing only), record of offences (in employment only), sex (including pregnancy and breastfeeding) and sexual orientation as noted in the Ontario Human Rights Code.</p> <p>5. A registrant shall not commit acts derogatory to the dignity of the profession. Specifically, registrants should avoid the following: (1) advising or encouraging someone to commit a discriminatory, fraudulent, or illegal act.</p> <p>Division IV</p> <p>A registrant must provide the Association with details of any of the following that relate to the registrant and that occur or arise after the initial registration of the registrant: (1) Any finding of guilt for a criminal offence. (2) Any finding of professional misconduct, incompetence, or incapacity, whether in Ontario or in another jurisdiction, and whether it is in relation to the human resources management profession or another related profession.</p> <p>Chapter IX</p> <p>1. Either as an independent practitioner or as an employee of an organization, a member can be called upon to represent persons or organizations at various labour and employment tribunals and boards including, but not limited to:</p> <ul style="list-style-type: none"> • Ontario Labour Relations Board • Canadian Industrial Relations Board • Human Rights Tribunal of Ontario • Canadian Human Rights Tribunal • Ontario Workplace Safety and Insurance Board • Workplace Safety & Insurance Board Adjudicator Hearings • Ontario Workers Compensation Appeals Tribunal • Grievance Settlement Board • Ontario Pay Equity Hearings Tribunal 	
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		• Information and Privacy Commissioner	
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Discipline Committee

Chair: Lynne Latulippe, (member of the public)

Vice-Chair: Steven Lewis, LL.B, Allied Registrant

Staff Support: Margaret Wilson, CHRP, CHRL

Independent Legal Counsel: Luisa Ritacca, Managing Partner, Stockwoods LLP

The Discipline Committee is a statutory committee established under Section 12 of the *Registered Human Resources Professionals Act, 2013* (the "Act") and the By-laws to hear every matter referred to it by the Complaints Committee under Section 34 of the Act and section 15.03 of the By-laws. The Discipline Committee shall:

- a. Determine whether the member, student or firm is guilty of professional misconduct as defined in the by-laws.
- b. If the Committee finds a member, student or firm guilty of professional misconduct, exercise any of the powers granted to it under Subsection 34(4) of the Act.

Q4 Highlights:

- There were no referrals to the Discipline Committee in Q4.

Discipline Committee Activity

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Referrals to Discipline Committee	1	2	0	0	0	0	0
Decision issued by Discipline Committee	1	1	1	0	0	0	1

Capacity Committee

Chair: Lynne Latulippe, (member of the public)

Vice-Chair: Steven Lewis, LL.B, Allied Registrant

Staff Support: Margaret Wilson, CHRP, CHRL

Independent Legal Counsel: Luisa Ritacca, Managing Partner, Stockwoods LLP

The Capacity Committee is a statutory committee established under Section 12 of the *Registered Human Resources Professionals Act, 2013* (the "Act") and the By-laws to hear every matter referred to it by the Association under Section 47 of the Act and section 15.03 of the By-laws. The Capacity Committee shall:

- a. Determine whether a member or student is incapacitated.

- b. If the Committee finds a member or student is incapacitated, exercise any of the powers granted to it under Subsection 47(8) of the Act.

Q4 Highlights:

- There were no capacity hearings conducted in Q4. The last time the Capacity Committee had a referral was in 2014.

Capacity Committee Activity

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Referrals to Capacity Committee	0	0	0	0	0	0	0
Decision issued by Capacity Committee	0	0	0	0	0	0	0

Review Committee

Chair: Damienne Lebrun-Reid, LL.B (member of the public)

Vice-Chair: Graham Stanclik, CHRP, CHRL, CPM

Staff Support: Margaret Wilson, CHRP, CHRL

Independent Legal Counsel: John Wilkinson, Partner, WeirFoulds LLP.

The Review Committee is a statutory committee established under Section 12 of the *Registered Human Resources Professionals Act, 2013* (the “Act”) and the By-laws to review every matter referred to it by the Registrar under Section 40 of the Act. The Review Committee may:

- Determine whether the member or firm’s bankruptcy or insolvency event may pose a risk of harm to any person;
- Direct the Registrar to investigate the matter;
- Determine whether a hearing is warranted and, if so, to conduct hearings when warranted to determine whether the member or firm’s bankruptcy or insolvency event poses a risk of harm to any person;
- Upon a determination that there are reasonable grounds for believing that the member or firm’s bankruptcy or insolvency event poses or may pose a risk of harm to any person following a hearing, exercise any of the powers granted to it under Subsection 41(8) of the Act.

Q4 Highlights:

- There were no notices of disclosure in Q4.
- There was one decision issued by the Review Committee in Q4. The committee has requested additional information and the case will be reheard in Q1 of 2022.
- The Review Committee has not conducted a hearing to date.

Review Committee Activity*

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Notices of bankruptcies or insolvency events	3	3	1	1	2	0	4
Decisions issued by the Review Committee	8	1	1	2	0	1	4

*While the Review Committee reviews all bankruptcy or insolvency events involving members of HRP, the Registration Committee is considers bankruptcy or insolvency events of applicants for registration as part of the Good Character requirement.



Appeal

Appeal Committee

Chair: Melanie Kerr, CHRP, CHRL

Vice-Chair: Maureen Quinlan, LL.B (member of the public)

Staff Support: Stephanie Jung

Independent Legal Counsel: Luisa Ritacca, Managing Partner, Stockwoods LLP

The Appeal Committee is a statutory committee established under Section 12 of the *Registered Human Resources Professionals Act, 2013* (the "Act") and the By-laws to review every request for appeal filed under the Act and the By-laws by registrants of HRP or members of the public. The Appeal Committee shall determine whether there was a denial of natural justice or an error on the record of the decision of the committee or the Registrar and to exercise any of the powers granted to it under the Act and Section 22 of the By-laws.

Q4 Highlights:

The Appeal Committee closed out 2021 with 12 appeals. This is in line with the number of appeals filed in 2020 (11 appeals). 2019 was the Committee's highest volume year with 75 appeals. The bump in appeals in 2019 coincided with the November 2018 Validation of Experience grandfathering deadline. For that deadline, a member could be granted the CHRL designation without meeting the CHRL Employment Law Exam requirement if they passed the experience requirement (Validation of Experience – VOE) before November 2018. After Nov 2018, passing the CHRL Employment Law Exam was a requirement. This grandfathering deadline had a residual effect for the Appeal Committee as a number of applicants who failed the VOE appealed their results.

The Appeal Committee held their annual business meeting in November and reviewed any learnings that came up this past year.

Three decisions were issued this quarter, all upholding the original Committee's decision:

- One appeal was regarding a decision of the Registrar.
- One appeal was regarding a decision of the Experience Assessment Committee.
- One appeal was regarding a decision of the Complaints Committee.

Two new appeals were filed in Q4: both against the Experience Assessment Committee regarding an assessment of a Validation of Experience application. One was later withdrawn by the appellant.

Appeal Committee Activity

	2019	2020	2021				2021
	Total	Total	Q1	Q2	Q3	Q4	Total
Number of appeals filed*	75	11	5	2	3	2	12
Settled via the Alternate Resolution Process	27	8	0	0	0	0	0
Decisions issued by the Appeal Committee	48	5	1	6	2	3	12

*Please note: The number of appeals filed will not necessarily be equal to the number of appeals settled or decided by the Appeal Committee, since appeals filed in one year may be resolved in the following year.

Alternate Resolution Process

One factor that influences the number of appeals that are heard by the Appeal Committee is the HRPAs alternate resolution process for appeals. If the Registrar believes that the appellant has shown in their Request for an Appeal that something may have gone wrong with the process or that there may have been a denial of natural justice, the Registrar may extend an offer to the appellant to settle the appeal. Under those circumstances, the appellant has three options:

1. Accept the offer and withdraw the appeal,
2. Accept the offer with the provision that a panel of the Appeal Committee review and sign off on the agreement between the appellant and HRPAs, or
3. Reject the offer, which means the appeal will proceed as an uncontested appeal.

Appellants are never pressured to choose one option or another. The benefit for appellants and HRPAs is a quicker resolution of the matter. Concerning appeals of decisions of the Experience Assessment Committee (EAC), the settlement usually involves having the Validation of Experience (VOE) or alternate route application reviewed by a second independent panel. Most appellants who are appealing a decision by the EAC want a 'second opinion' on their application. As noted above, the Appeal Committee was not established to give second opinions but to review the process by which the decision was arrived at.

The impact of the alternate resolution process is that most of the decisions of the (EAC) where the facts suggest that an appeal might be warranted, never make it to being reviewed by a panel of the Appeal Committee as the VOE or Alternate Route application is sent to a new Experience Assessment Committee (EAC) panel for review.

Q4 2021 Appeal Committee Activity

	Date Appeal Filed	The Nature of the Appeal	The Outcome of the Appeal
A-2021-08	June 23, 2021	The Registrar should allow a course that was taken during the dates of a previous CPD cycle to be carried over to the next CPD	A decision was issued in October 2021 upholding the Registrar's decision.

		cycle. The course hours were not needed for the previous cycle. Since the course dates fall outside of the current CPD cycle, the appellant would like an exemption to be made to use the course in the current CPD cycle.	
A-2021-09	August 5, 2021	The Experience Assessment Committee made an error in assessment on an Alternate Route application.	A decision was issued in October 2021 upholding the Experience Assessment Committee's decision.
A-2021-10	August 5, 2021	The Complaints Committee did not fully assess all documents and failed to consider the correct facts.	A decision was issued in November 2021 upholding the Complaints Committee's decision.
A-2021-11	September 6, 2021	The Experience Assessment Committee made an error in assessment on a Validation of Experience application.	The appellant withdrew their appeal in November 2021.
A-2021-12	November 26, 2021	The Experience Assessment Committee made an error in assessment on a Validation of Experience application.	The request for appeal application is incomplete. Currently waiting for more information from the appellant.

Breakdown of Appeal Decisions

Appeal Outcomes	Count
Total number of requests for appeal received September 1, 2021 and November 30, 2021	3
Total number of appeals settled via the Alternate Resolution Process	0
Total number of final appeal decisions released September 1, 2021 and November 30, 2021	3
Decisions upholding the original decision	3
Decisions overturning the original decision	0
Appeal declined on jurisdictional grounds	0

*In Q4, the average time to decision was 105 days. The appeal that was withdrawn by the appellant was not included in this calculation as it was never reviewed by a panel of the Appeal Committee.



Stakeholder education

Regulatory Affairs Newsletter

The *Regulatory Affairs* newsletter is published under By-laws 13.06 and 13.07.

As set out in the By-laws, the *Regulatory Affairs* newsletter shall include but not be limited to:

- (a) Notices of annual meetings.
- (b) Election results; and
- (c) All information as set out in Section 21.03 and Section 21.08 concerning discipline or review proceedings. Where there is a dissenting opinion prepared by a member of the panel and the decision, finding or order of the Discipline Committee or the Review Committee is to be published, in detail or summary, any publication will include the dissenting opinion.

In Q4, a *Regulatory Affairs* Newsletter was published on October 11, 2021. The next publication will be in Q1 on January 24, 2022.

HRPA Regulatory Committee Training

HRPA offers training for the members of HRPAs Regulatory Committees. This year, all training topics were presented virtually and included multiple sessions throughout the year. A session titled *What's new in Professional Regulation?* was held on March 22, 2021, and was facilitated by Rebecca Durcan, HRPAs regulatory counsel. A welcome orientation session was held on June 23, 2021 and facilitated by Rebecca Durcan. The session's focus was on the public interest in the context of self-regulation, governance, and the duties of regulatory committees and the Board. A session on the topic of *Protecting Workplaces, Employees, and Employers from Risks of Harm: HRPAs Shift to Risk-Based Regulation* was held on November 24, 2021, and was facilitated HRPAs Emily Sully, Policy Analyst, and Mara Berger, Associate Registrar. Key learnings of this session were:

- What risk-based regulation is and what it means for our members and students, and members of the public (e.g., workplaces, employees, and employers),
- Risks of harm identified through extensive research and consultations that the practice of HR may pose to the public,
- How HRPAs, its members and students, and the public can work together in partnership to prevent and mitigate the risks of harms identified, and
- Examples of early responses HRPAs is taking to address potential high-risk areas of HR practice to better equip members and students in preventing and mitigating risks.

Staff attendance at SOAR, CNAR, and CLEAR Conferences

Staff from the OOTR had the opportunity to attend several regulatory conferences in Q4: CLEAR (Council on Licensure, Enforcement & Regulation) ran September 13 – 24, 2021, CNAR (Canadian Network of Agencies for Regulation) ran October 12 – 21, 2021, and SOAR (The Society of Ontario Adjudicators and Regulators) was on November 4, 2021. All three of these conferences were delivered on virtual platforms,

which allowed for more staff to attend. The virtual conferences provided a different kind of conference experience, but the knowledge gained from the sessions invaluable. Of note, two of our staff volunteered on two different CLEAR Committees. One staff member continued their participation over the last year on the CLEAR Regulatory Agency Administration Committee. The committee's objective was identifying the trends and issues of interest to the regulatory community for the CLEAR program, resource, and content development. The second staff member volunteered on the Examination Resources & Advisory Committee and will be continuing their service for another year. On October 4, 2021, all OOTR staff attended a CNAR workshop *Fundamentals in Professional Regulation*, followed by a debrief with HRPAs regulatory counsel Rebecca Durcan on October 6, 2021.

Trend and Issues in Professional Regulation

In this Report we deliver updates on items previously noted in the Trends and Issues section of the Registrar's Report.

1. In the Q3 2021 Registrar's Report, we reported that the Law Society of BC had appointed Harry Cayton to conduct an independent review of Society's governance and how it meets the needs and priorities of a diverse public and legal profession. Cayton delivered his report on November 25, 2021.
2. In the Q1 2020, Registrar's Report, we reported on the development of the College Performance Measurement Framework (CPMF) by Ontario's Ministry of Health. In the Q4 2020, Registrar's Report, we reported on the launch of the CPMF initiative. On October 8, 2021, the Ministry of Health released its Summary Report on the first year of the implementation of the CPMF.

Harry Cayton delivers his report on the governance review of the Law Society of BC

The Law Society's board has appointed Harry Cayton to conduct an independent review of Law Society governance and how it meets the needs and priorities of a diverse public and legal profession. Cayton's review will examine the Society's governance structure, how it assists or inhibits the delivery of the legal regulator's core purpose and statutory functions, how it enables and supports equity, diversity and inclusion, and whether it achieves best practice in regulatory governance.

<https://www.lawsociety.bc.ca/Website/media/Shared/docs/about/GovernanceReview-2021.pdf>

As usual Harry Cayton was direct in his assessment of governance at the Law Society of BC:

"The review finds that the legal framework within which the Law Society operates is not fit for a modern regulatory body and that it hampers the Law Society's Benchers in fulfilling their responsibilities. In particular, the power of the members to elect the Benchers and to overrule them and to stop changes to the Society's rules means that the Society acts more like a professional association than a professional regulator."

"The review finds that there is a lack of engagement with regulatory matters and that the Society is too involved in responding to the interests of the legal profession."

"The review finds that the Law Society's governance has strengths in its comprehensive governance policies and procedures, its commitment to equity and diversity and truth and reconciliation, its corporate behaviour and respectful discussion of issues and the positive relationship between the Benchers and the executive team. It finds weaknesses in conflicts of interest, lack of focus on regulatory matters, measurement of outcomes and lack of engagement with the users of legal services and commitment to the public's interests."

"The Society must reinforce its clarity of purpose and make the public's interests the centre of its decision-making by requiring all policy decisions to be justified in the public interest with reasons given. This should apply to both the setting up of new committees or working groups or taskforces and to the acceptance of their proposals."

Included in Harry Cayton's report is a strong endorsement of risk-based regulation:

"The purpose of a regulator is to manage risk of harm and promote good professional practise³⁹. We should therefore expect a regulator to have an understanding of harms and how they are caused within its sector. The management of the risk of harm should be at the centre of its many roles, whether it be public protection, lawyer education, financial management or policy development. This is sometimes called risk-based oversight."

"A professional regulator should be able to state with confidence which are the most significant harms to the public that might arise from incompetence or misconduct by its registrants and what action it is taking to minimise the risk of those harms."

Of course, it is too early to tell what kind of impact this report will have on the Law Society of BC and other Law Societies across Canada. We will report on the fall-out from this Cayton Report in subsequent Registrar's Reports.

College Performance Measurement Framework update

On October 8, 2021, the Ministry of Health released its Summary Report on the first year of the implementation College Performance Measurement Framework.

https://health.gov.on.ca/en/pro/programs/hwrob/CPMF_summary_report.aspx

The elephant in the room is that the government (ministry) has been concerned that professional regulatory bodies under their oversight have been unable or unwilling to prioritize the public interest. Instead of tackling that issue dead-on, however, the Ministry of Health has chosen to approach it as a broader performance measurement issue.

This is the same approach that was used with the creation of the Office of the Fairness Commissioner—that the assessment and publication of assessment results would lead regulators to change their behavior. It may be debated whether this approach has accomplished all that was desired.

Interestingly, even Harry Cayton has weighed in on the College Performance Measurement Framework⁵.

"I know that Ontario has recently worked very hard—a lot of the regulators worked together on building a sort of framework of performance measurement. I am, to be honest, a little skeptical that it's focused on not enough on outcomes and quite a lot on measuring process but it's a step in the right direction. I hope that will be implemented and I hope it will result in much more public comparable data about different regulators."

Harry Cayton's concern is that results say more about the process than process says about performance.

⁵ <http://santishealth.ca/podcasts/episode-10-health-profession-regulation-is-ontarios-current-model-working/>

“But it remains my view that governance tells us little about performance. It’s performance that tells us about governance.”

During initial reporting cycles a College’s regulatory performance would not be assessed or ranked. The intent was to establish a baseline. Nonetheless, the Report has identified a number of commendable practices and areas for improvement.

The ministry also announced a governance modernization project the details of which are still to be made public.