

**CHARTERED PROFESSIONAL
ACCOUNTANTS OF ONTARIO**

REGULATION 9-4

**STUDENT TRANSITION [LEGACY CPA CERTIFICATION PROGRAM TO CPA PROFESSIONAL
PROGRAM]**

Adopted by the Council under the *Chartered Professional Accountants of Ontario Act, 2017* and the By-law, on March 5, 2026, effective as of November 1, 2026.

Note: This Regulation has been approved but will not come into force until the effective date noted above. Sections not yet in force appear in **greyed text**.

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REGULATION 9-4

STUDENT TRANSITION [LEGACY CPA CERTIFICATION PROGRAM TO CPA PROFESSIONAL PROGRAM]

Application

This Regulation applies to Students of CPA Ontario registered pursuant to Regulation 9-1 prior to January 1, 2027 (defined herein as "9-1 Students").

Unless otherwise provided in this Regulation, 9-1 Students remain subject to the provisions of Regulation 9-1 (defined herein as the "Legacy CPA Certification Program").

Application for re-registration will be assessed based on the registration and program requirements applicable to the Applicant and in force at the time of submission.

Definitions

1. In this Regulation, words have the same meaning as they do in the Act, the By-law, Regulation 9-1, Regulation 9-3, the CPA Harmonized Education Policies, and the CPA Ontario Practical Experience Requirements, and for the purpose of this Regulation:
 - 1.1 "9-1 Students" means Students registered pursuant to Regulation 9-1 prior to January 1, 2027;
 - 1.2 "CPA Professional Program" means the program described in Regulation 9-3;
 - 1.3 "Legacy CPA Certification Program" means the program described in Regulation 9-1;
 - 1.4 "Student" means any Student registered under Regulation 9-1, 9-3 or any predecessor Regulation.

Transition from Legacy CPA Certification Program to CPA Professional Program

2. Unless otherwise provided in this Regulation or in Regulation 9-1, 9-1 Students have until December 31, 2028 to complete the Legacy CPA Certification Program or transition pursuant to this Regulation to complete the CPA Professional Program.
3. Once a Student has transitioned from the Legacy CPA Certification Program to the CPA Professional Program, they are thereafter governed by Regulation 9-3, and cannot transition back to the Legacy CPA Certification Program.

Maximum Registration Period

4. On January 1, 2029, the maximum registration period of 9-1 Students who have transitioned to the CPA Professional Program will be extended up to an additional three years, to a total of a maximum period of seven years to complete the CPA Professional Program, with the exception of 9-1 Students who transition into the Pre-Certification or Interim categories of registration.

Transition Blackout Dates

5. 9-1 Students will not be permitted to transition between the date of an Examination until the date that the results of the Examination are released.

Legacy CPA Certification Program PREP, PEP and CFE End Dates

6. The last dates on which each of the following components of the Legacy CPA Certification Program will be offered are:
- 6.1 CPA Preparatory exam (PREP): December 2026
 - 6.2 CPA Professional Education Program (PEP):
 - 6.2.1 Final Core 1 module: January 2027
 - 6.2.2 Final Core 1 exam: June 2027
 - 6.2.3 Final Core 2 exam: September 2027
 - 6.2.4 Final Elective exams: March 2028
 - 6.2.5 Final Capstone 1 module: June 2028
 - 6.2.6 Final Capstone 2 module: September 2028
 - 6.3 Common Final Examination (CFE): September 2028

Mandatory Transition from Legacy CPA Certification Program to CPA Professional Program

7. Unless they are ineligible subject to sections 9 through 11 of this Regulation, as a result of the last dates offered for components of the Legacy CPA Certification Program:
- 7.1 9-1 Students who have not successfully completed Core 1 as of July 15, 2027 will be transitioned by CPA Ontario as of that date to the CPA Professional Program.
 - 7.2 9-1 Students who have not successfully completed Core 2 as of October 15, 2027, will be transitioned by CPA Ontario on that date to the CPA Professional Program.
 - 7.3 9-1 Students who have not successfully completed the required 2 electives as of April 15, 2028 will be transitioned by CPA Ontario on that date to the CPA Professional Program.
 - 7.4 9-1 Students who have not successfully completed Capstone 1 as of July 15, 2028, will be transitioned by CPA Ontario on that date to the CPA Professional Program.
 - 7.5 9-1 Students who have not successfully completed Capstone 2 as of September 7, 2028, will be transitioned by CPA Ontario to the CPA Professional Program.
8. Unless they are ineligible subject to sections 9 through 11 of this Regulation, 9-1 Students who have completed the PEP and CFE in the Legacy CPA Certification Program, but who have not completed the Practical Experience Requirements of the Legacy CPA Certification Program, by December 31, 2028, will be transitioned by CPA Ontario to the CPA Professional Program.

Ineligibility to Transition from Legacy CPA Certification Program to CPA Professional Program

9. 9-1 Students who complete the Legacy CPA Certification Program pursuant to section 65 of Regulation 9-1 on or before December 31, 2028 are not eligible to transition to the CPA Professional Program.

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9.1 These 9-1 Students shall apply for admission to Membership within 6 months of December 31, 2028 or may be deregistered in the discretion of the Registrar [consistent with section 3.2 of Regulation 9-3].

10. 9-1 Students who have 2 Unsuccessful Attempts under Regulation 9-1, and are awaiting the results of their third CFE attempt, are not eligible to transition to the CPA Professional Program.

11. 9-1 Students who are eligible for deregistration pursuant to section 47.1, 47.3 or 47.6 or 47.7 of Regulation 9-1, on or before December 31, 2028, are not eligible to transition to the CPA Professional Program.

11.1 Any such 9-1 Student who does not complete the Legacy CPA Certification Program by December 31, 2028 and who has not been deregistered as of that date shall be deregistered by the Registrar.

Legacy CPA Certification Program PEP and CFE Exemptions in CPA Professional Program

12. 9-1 Students who transition to the CPA Professional Program and have successfully completed the component(s) of the Legacy CPA Certification Program set out below shall be exempted from completion of the component(s) of the CPA Professional Program, exclusively as set out below:

Legacy CPA Certification Program Component(s): Common Pathway	CPA Professional Program Module Exemption(s)	CPA Professional Program Exam Exemption(s)
Core 1 Eligible (Accounting Major. All CPA Preparatory Courses Complete)	N/A	Knowledge Assessment
Core 1 but not Core 2	Foundational Development	Knowledge Assessment
Core 2 but not Core 1	Foundational Development	Knowledge Assessment
Core 1 and Core 2	Foundational Development	Knowledge Assessment Foundational Development
1 Elective	Foundational Development CPA Core (Common)	Knowledge Assessment Foundational Development
2 Electives	Foundational Development CPA Core (Common)	Knowledge Assessment Foundational Development
CFE Day 1 only	Foundational Development Module CPA Core (Common) CPA Leadership	Knowledge Assessment Foundational Development
CFE Day 2/3 only	Foundational Development CPA Core (Common) CPA Leadership	Knowledge Assessment Foundational Development CPA Core (Professional Final Exam 1 Common) CPA Leadership (Professional Final Exam 2)
CFE Days 1, 2 and 3	Foundational Development CPA Core (Common) CPA Leadership CPA Professional Readiness CPA Professional Readiness Final Exam 3	Knowledge Assessment Foundational Development CPA Core (Professional Final Exam 1 Common) CPA Leadership (Professional Final Exam 2) CPA Professional Readiness (Professional Final Exam 3)

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Legacy CPA Certification Program Component(s): Licensure Pathway	CPA Professional Program Module Exemption(s)	CPA Professional Program Exam Exemption(s)
2 Electives (must be Assurance and Taxation)	Foundational Development CPA Core (Licensure)	Knowledge Assessment Foundational Development
CFE Day 1 only Both Assurance and Taxation Electives	Foundational Development CPA Core (Licensure) CPA Leadership	Knowledge Assessment Foundational Development
CFE Day 2/3 only Depth in Financial Reporting and Assurance, and both Assurance and Taxation Electives	Foundational Development CPA Core (Licensure) CPA Leadership	Knowledge Assessment Foundational Development CPA Core (Professional Final Exam 1 Licensure) CPA Leadership (Professional Final Exam 2)
CFE Day 1 and CFE Day 2/3 Depth in Financial Reporting and Assurance, and both Assurance and Taxation Electives	Foundational Development CPA Core (Licensure) CPA Leadership CPA Professional Readiness	Knowledge Assessment Foundational Development CPA Core (Professional Final Exam 1 Licensure) CPA Leadership (Professional Final Exam 2) CPA Professional Readiness Final Exam 3

12.1 No exceptions, reconsiderations or appeals are available in respect of the exceptions set out in section 12.

12.2 If a Student has successfully completed Legacy CPA Certification Program Education and Examination: Licensure they will be deemed to have met the education and examination licensure requirement of Regulation 9-3.

Legacy CPA Certification Program Practical Experience

13. 9-1 Students completing Practical Experience Requirements in the Legacy CPA Certification Program may continue to do so until December 31, 2028.

13.1 9-1 Students who do not transition to the CPA Professional Program shall submit experience reports and an assessment request under Appendix B of Regulation 9-1 on or before December 31, 2028.

13.2 9-1 Students who transition to the CPA Professional Program may have the option to submit experience reports under Appendix B of Regulation 9-1 on or before December 31, 2028. Successful completion of all or a portion of the Legacy CPA Certification Program Practical Experience will be eligible to be recognized as Eligible Work Experience credit in the CPA Professional Program, exclusively as set out below:

13.2.1 If at least 8 months of experience and the development of three sub-competencies to at least a level 1 proficiency are recognized by CPA Ontario under Appendix B of Regulation 9-1, credit will be granted for eight months of Foundational Work Experience in the CPA Professional Program.

13.2.2 Credit for Professional Work Experience in the CPA Professional Program will be granted at the discretion of the Director of Employer Relations.

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13.2.3 If a Student has successfully completed the practical experience licensure requirements under Regulation 9-1 they will be deemed to have met the practical experience licensure requirements of Regulation 9-3.

13.3 No exceptions, reconsiderations or appeals are available in respect of the credit set out in section 13.

Transition to CPA Professional Program Registration Categories

14. 9-1 Students who transition to the CPA Professional Program shall be moved from the category of registration in the Legacy CPA Certification Program to the category of registration in the CPA Professional Program, exclusively as set out below:

9-1 Section	9-1 Legacy CPA Certification Program Registration Category	9-3 CPA Professional Program Registration Category
9.1	University Graduate	University Graduate
9.2	CPA Accredited Program	University Graduate
9.3	Accounting Body Outside Canada	Member of Accounting Body Outside Canada
9.4	Accounting Body Outside Canada – Specified	Member of Accounting Body Outside Canada – MOU
9.5	Mature	Non-Degree
9.8	Transitional CA Student *	n/a
9.9	Transitional CGA Student*	n/a
9.10	Transitional CMA Student*	n/a
11	Conditional: University Graduate (completed at least 30 credit hours at an academic institution)	Interim
11	Conditional: University Graduate (currently enrolled in a program leading to a degree)	Pre-Certification
12	Conditional: Mature	n/a

* 9-1 Students who have been granted a timeline extension beyond December 31, 2028, under section 2 of Regulation 9-1 – University Graduate

Repeal

15. This Regulation shall be automatically repealed on December 31, 2029 if it is not repealed by Council prior to that date.