



OFFICE OF THE INFORMATION  
AND PRIVACY COMMISSIONER  
NEWFOUNDLAND AND LABRADOR

# Time Extensions and Disregards

## ATIPPA, 2015

**Municipal Workshop 2026**

Rebekkah Bourne

Senior Access and Privacy Analyst

June 10, 2026

[www.oipc.nl.ca](http://www.oipc.nl.ca)

1.877.729.6309

[commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca)

# Looking at the Stats

Public Bodies 2024-2025	
Access Requests	<b>4330</b>
Time Extensions	<b>1102</b>
Disregards	<b>109</b>

Municipalities 2024-2025	
Access Requests	<b>714</b>
Time Extensions	<b>60</b>
Disregards	<b>10</b>

Access to Information and  
Protection of Privacy Act, 2015



# Looking at the Stats

Public Bodies 2024-2025	
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Municipalities 2024-2025	
Access Requests	<b>714</b>
Time Extensions	<b>60</b>
Disregards	<b>10</b>

24%

8%

Access to Information and  
Protection of Privacy Act, 2015



# Looking at the Stats

Public Bodies 2024-2025	
Access Requests	<b>4330</b>
Time Extensions	<b>1102</b>
Disregards	<b>109</b>

3%

Municipalities 2024-2025	
Access Requests	<b>714</b>
Time Extensions	<b>60</b>
Disregards	<b>10</b>

1%



# Problems with the Timeline

Access Request – s. 11

Final Response – s. 16

**20 Business Days**



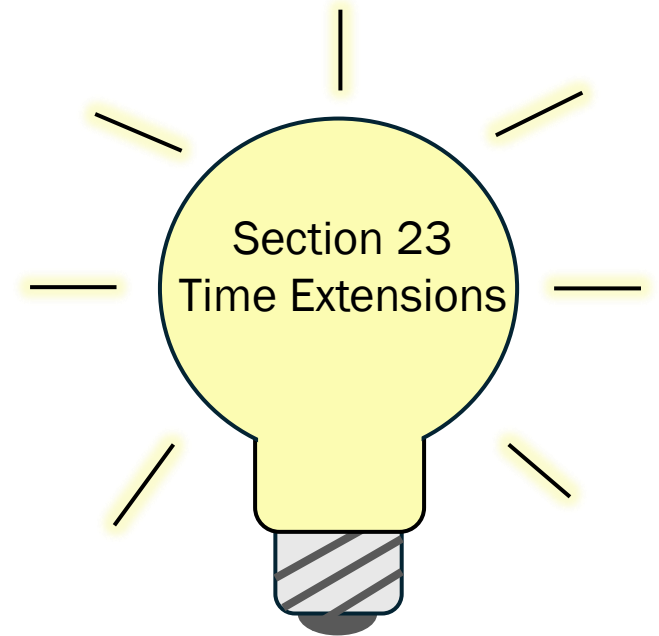
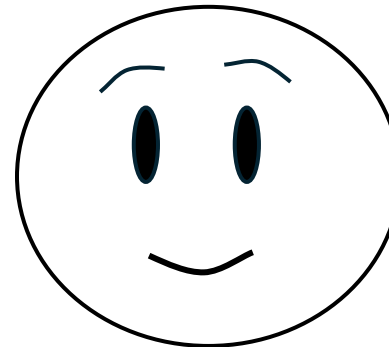
I need more  
time!

# Time Extensions

Access Request – s. 11

Final Response – s. 16

**20 Business Days**



# Time Extensions

- Form: [Time Extension Application](#)
- Send to: [Commissioner@oipc.nl.ca](mailto:Commissioner@oipc.nl.ca)
- Guidance: [Requesting a Time Extension](#)

**ATIPPA, 2015 Form**  
**Time Extension Application**

A public body may use this form to apply for an approval to extend the time for responding to an access request. Section 23 of the Access to Information and Protection of Privacy Act, 2015 (ATIPPA, 2015) states:

- (1) The head of a public body may, not later than 15 business days after receiving a request, apply to the commissioner to extend the time for responding to the request.
- (2) The commissioner may approve an application for an extension of time where the commissioner considers that it is necessary and reasonable to do so in the circumstances, for the number of business days the commissioner considers appropriate.
- (3) The commissioner shall, without delay and not later than 3 business days after receiving an application, decide to approve or disapprove the application.

Please see our [guidance document](#) to assist you in completing this form.

You can complete and send this form  
If you have any questions or concerns, call 1-877-729-6309.

**Do not include applicant's name**

Date of Time Extension Application:

Section 1: Public Body Information	
Public Body Name	
Public Body File Number	
Contact Person	
Contact Phone Number	
Contact Email	

**Requesting a Time Extension**

**Purpose**  
Section 23 of the Access to Information and Protection of Privacy, 2015 (ATIPPA, 2015) gives the Commissioner authority to approve an application by a public body for an extension of time for responding to an Access Request. The only extension available to a public body under the ATIPPA 2015 is through an application to the Commissioner under this section. These guidelines have been developed in accordance with the principle that individuals who make access to information requests are entitled to a timely response to their requests.

These guidelines set out the criteria and procedure to be used when making an application for an extension of time to the Office of the Information and Privacy Commissioner (OIPC).

**Introduction**  
Section 16(1) of the ATIPPA, 2015 provides that a public body shall respond to an Access Request without delay and in any event not more than 20 business days after receiving it, unless the time limit for responding is extended by the Commissioner under section 23. A business day is a day that is not a Saturday, Sunday or a holiday as defined in the [Interpretation Act](#).

Section 23 allows a public body to apply to the Commissioner for an extension of time to respond to an Access Request not later than 15 business days after receiving the request. The Commissioner is authorized to approve a time extension application where it is considered necessary and reasonable to do so in the circumstances outlined by the public body in its application. The Commissioner has authority to extend for the number of business days that is considered appropriate in the circumstances.

**Making a Request for Extension of Time**  
An application for an extension of time shall be made using the Time Extension Application Form. Given the strict legislated timelines for making and responding to a request for an extension of time, the form should be submitted via e-mail to [commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca). Public bodies may also contact the Commissioner's Office by telephone prior to sending the e-mail to discuss the matter briefly.

This guidance document will provide assistance in completing the Time Extension Application Form.

**Office of the Information and Privacy Commissioner**  
P.O. Box 13004, Station 'A', St. John's, NL, A1B 3Y8  
Telephone: (709) 729-6309 or 1-877-729-6309 Fax: (709) 729-6500  
E-mail: [commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca) [www.oipc.nl.ca](http://www.oipc.nl.ca)

Original Issue Date: June 2015  
Revised Issue Date: July 2015

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Revision 1



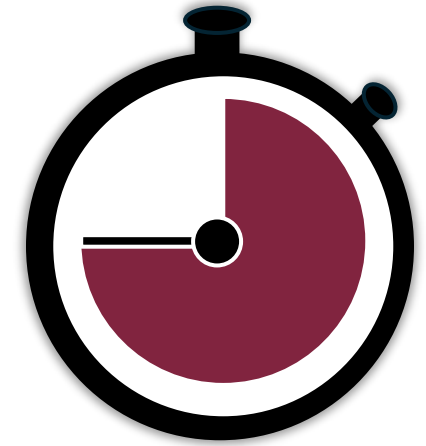
# Time Extensions

- Time Extension Application – 15 business days
- OIPC Response - 3 business days
- “necessary and reasonable to do so in the circumstances”



# Time Extensions

- Time Extension Application – 15 business days
- OIPC Response - 3 business days
- “necessary and reasonable to do so in the circumstances”



**Reminder: Sending an extension request doesn't stop the clock!**



# Time Extensions

- Time Extension Application – 15 business days
- OIPC Response - 3 business days
- “necessary and reasonable to do so in the circumstances”

**Extraordinary Circumstances  
Section 24**



**Filed on Any Day**  
(even outside of 15 business days)





# Time Extensions

## The Basics

- public body number
- number of days
- access request status
- reasons
- fill in prior request info



# Time Extensions

## The Basics

- public body number
- number of days
- access request status
- reasons
- fill in prior request info

**Got the extension, but still need more time?**

**Pro Tip:** You can send **multiple** extension applications.

Public bodies can ask for more time, as long as the new application is sent **5 days before** extended deadline.



# Time Extensions

## The Basics

- public body number
- number of days
- access request status
- **reasons** →
- fill in prior request info

Large volume of records  
Unreasonable interference with operations  
Clarify request/Insufficient detail  
Third party consultation  
Consultation with another public body  
Executive consultation  
Difficulty gathering records  
Unforeseen circumstances  
Sensitivity or complexity of material



# Time Extensions

## OIPC's Internal Process

- Administrative Staff - Intake
- Senior Access and Privacy Analyst (SAPA) – Review and Decision
- Decision Outcomes: Approved, Partially Approved, or Denied



# Time Extensions

## Notifying the Applicant

- ✓ Reason for extension
- ✓ Extension authorized by Commissioner
- ✓ New final response date



# Time Extensions

## Notifying the Applicant

- ✓ Reason for extension
- ✓ Extension authorized by Commissioner
- ✓ New final response date

Send **Anonymized Copy** of  
Notice to OIPC

[Applicant Info Redacted]

Notice to the Applicant



# Time Extensions

## Municipality Stats

Access to Information and  
Protection of Privacy Act, 2015

Section 23

Last Three Years (2023-2026)	
Approved	<b>195</b>
Partial	<b>18</b>
Denied	<b>4</b>
Withdrawn	<b>5</b>
<b>Total Number of Time Extensions</b>	<b>222</b>

# Time Extensions

## Municipality Stats

**96%**

Last Three Years (2023-2026)	
Approved	<b>195</b>
Partial	<b>18</b>
Denied	<b>4</b>
Withdrawn	<b>5</b>
Total Number of Time Extensions	<b>222</b>

# Time Extensions - Common Errors



Access to Information and  
Protection of Privacy Act, 2015

**Section 23**



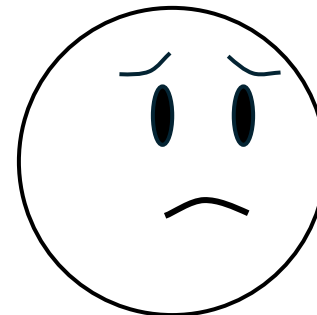
# Time Extensions – Common Errors

## Too much too soon



- Extension is too large (not supported by known facts)

This one might be a doozy...I'll just ask for an additional 90 days up front.



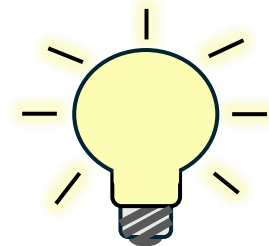
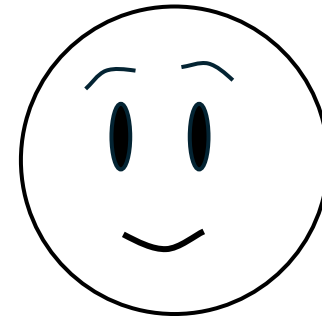
# Time Extensions – Common Errors

## Too much too soon

- Extension is too large (not supported by known facts)

**The Fix:** Send in a smaller extension and file for additional extensions if required.

I'll ask for an extra 10 days. If it turns out I need more time, I can always file for another extension.

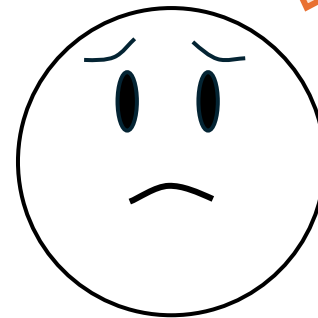


# Time Extensions – Common Errors

## Business Day Mix Up

- Excluding the wrong holidays from the business day count

I know weekends don't count...and I got that last holiday off, so that shouldn't count either right?



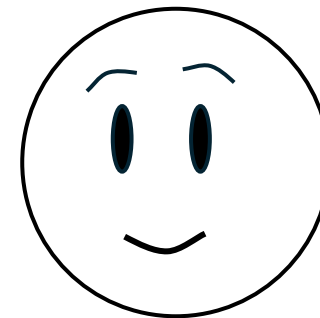
# Time Extensions – Common Errors

## Business Day Mix Up

- Excluding the wrong holidays from the business day count

**The Fix:** Unsure what holidays are “non-business” days, double check with resources or call OIPC.

Not all holidays are the same! I'll double check the count using my trusty OIPC wall calendar!



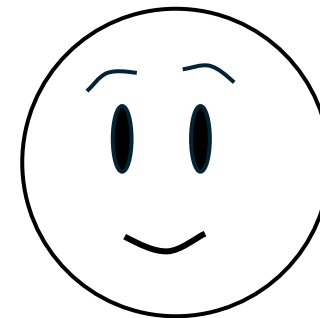
# Time Extensions – Common Errors

## “Business Day” Counting Resources

- ATIPP Office Guidance: [Timelines – Business Days](#)
- OIPC Webpage Tool: [Estimated Response Time Calculator](#)
- OIPC **FREE** Wall Calendar: Send your request to [commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca)

**The Fix:** Unsure what holidays count, double check using resources or call OIPC.

Not all holidays are the same! I'll double check the count using my trusty OIPC wall calendar!

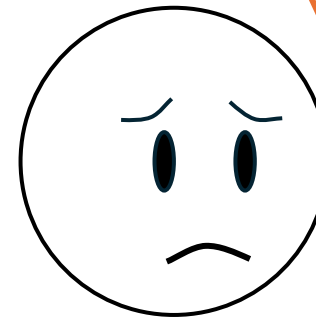


# Time Extensions – Common Errors

## Inaccurate Details

- Errors in the basic details

Annnnnd, form's done...time to hit send and hope for the best.



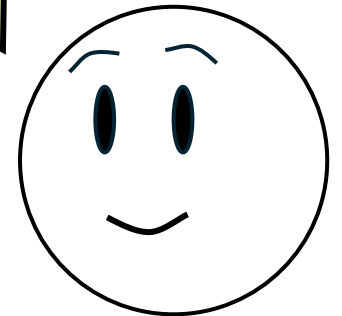
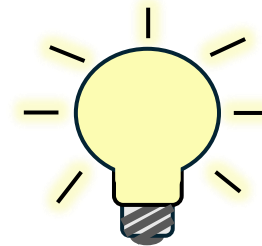
# Time Extensions – Common Errors

## Inaccurate Details

- Errors in the basic details

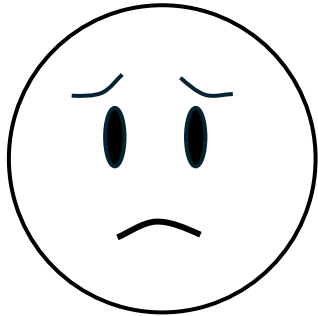
**The Fix:** Double check the details

There! Time for one last read-through before hitting send!



# Extremely Problematic Access Requests

This access request  
should not be  
processed!

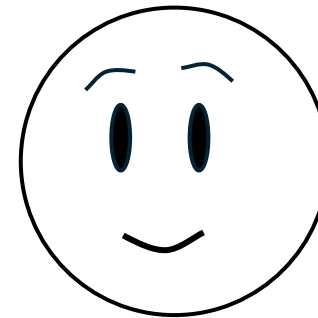
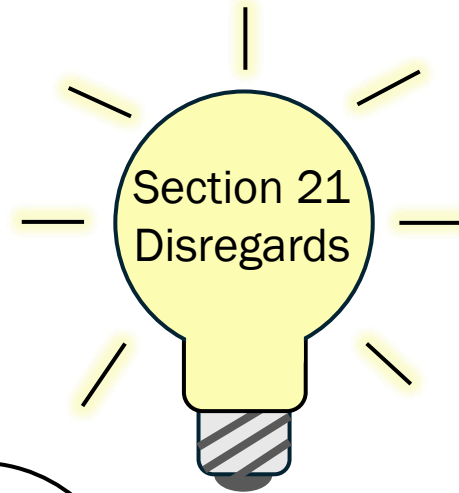
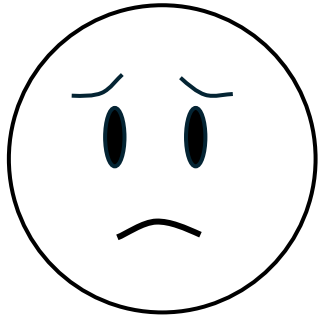


Access to Information and  
Protection of Privacy Act, 2015



# Disregards

This access request  
should not be  
processed!



# Disregards

- Form: [Disregard Application](#)
- Send to: [Commissioner@oipc.nl.ca](mailto:Commissioner@oipc.nl.ca)
- Guidance: [Applying to the Commissioner for Approval to Disregard an Access to Information Request](#)

ATIPPA, 2015 Form  
**Disregard Application**

A public body may use this form to apply for approval to disregard an access request. Section 21 of the **Access to Information and Protection of Privacy Act, 2015** (ATIPPA, 2015) states:

(1) The head of a public body may, not later than 5 business days after receiving a request, apply to the commissioner for approval to disregard the request where the head is of the opinion that

(a) the request would unreasonably interfere with the operations of the public body;

(b) the request is for information already provided to the applicant; or

(c) the request would amount to an abuse of the right to make a request because it is

(i) trivial, frivolous or vexatious,

(ii) unduly repetitive or systematic,

(iii) excessively broad or incomprehensible, or

(iv) otherwise made in bad faith.

(2) The commissioner shall, without delay and in any event not later than 3 business days after receiving an application, decide to approve or disapprove the application.

(3) The time to make an application and receive a decision from the commissioner does not suspend the period of time referred to in subsection 16(1).

(4) Where the commissioner does not approve the application, the head of the public body shall respond to the request in the manner required by this Act.

(5) Where the commissioner approves the application, the head of a public body who refuses to give access to a record or correct personal information under this section shall notify the person who made the request.

(6) The notice shall contain the following information:

(a) that the request is refused because the head of the public body is of the opinion that the request fails under subsection (1) and of the reasons for the refusal;

(b) that the commissioner has approved the decision of the head of a public body to disregard the request; and

(c) that the person who made the request may appeal the decision of the head of the public body to the Trial Division under subsection 52(1).

Please see our [guidance](#).  
You can complete and send this form to the Commissioner for Approval to Disregard an Access to Information Request.

If you have any questions, call the Commissioner at 877-729-6309.

**Do not**  
**send**

Date of Disregard Application

**Office of the Information and Privacy Commissioner**  
P.O. Box 13004, Station "A", St. John's, NL, A1B 3V8  
Telephone: (709) 729-6309 or 1-877-729-6309 Fax: (709) 729-6500  
E-mail: [commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca) [www.oipc.nl.ca](http://www.oipc.nl.ca)

Original Issue Date: June 2015  
Revision Date: August 25, 2015

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Revision 1



# Disregards

- Disregard Application – 5 business days
- OIPC Response - 3 business days



# Disregards

- Disregard Application - 5 business days
- OIPC Response - 3 business days



# Disregards

- Disregard Application - 5 business days
- OIPC Response - 3 business days



**Reminder: Sending a  
disregard request  
doesn't stop the clock!**



# Disregards

## Reasons for Disregard

- Access Request
  - Unreasonably interfere with operations;
  - Information already provided; or
  - Abuse of the right to make a request.



# Disregards

## Reasons for Disregard

- Access Request
  - Unreasonably interfere with operations;
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trivial, frivolous, or vexatious  
unduly repetitive or systematic  
excessively broad or incomprehensible  
or  
otherwise made in bad faith



# Disregards

## Reasons for Disregard

- Access Request
  - Unreasonably interfere with operations;
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  - Abuse of the right to make a request.

trivial, frivolous, or vexatious  
unduly repetitive or systematic  
excessively broad or incomprehensible  
or  
otherwise made in bad faith



# Disregards

## OIPC's Internal Process

- Administrative Staff - Intake
- Two Person Review and Decision
  - Senior Access and Privacy Analyst (SAPA)
  - Director of Research and Quality Assurance (DRQA)
  - Commissioner
- Decision Outcomes: approved, partially approved, or denied



# Disregards

## Notifying the Applicant

- ✓ Public Body's Refusal Decision
- ✓ Reasons for the Disregard
- ✓ Commissioner approved Public Body Disregard Decision
- ✓ Right of appeal under subsection 52(1)



# Disregards

## Notifying the Applicant

- ✓ Public Body's Refusal Decision
- ✓ Reasons for the Disregard
- ✓ Commissioner approved Public Body Disregard Decision
- ✓ Right of appeal under subsection 52(1)

Send **Anonymized Copy** of Notice to OIPC

[Applicant Info Redacted]

Notice to the Applicant



# Disregards

## Municipality Stats

Access to Information and  
Protection of Privacy Act, 2015

Section 21

Last Three Years (2023-2026)	
Approved	<b>30</b>
Partial	<b>8</b>
Denied	<b>7</b>
Withdrawn	<b>0</b>
<b>Total Number of Disregards</b>	<b>45</b>

# Disregards

## Municipality Stats

**84%**

Access to Information and  
Protection of Privacy Act, 2015

Section 21

Last Three Years (2023-2026)	
Approved	<b>30</b>
Partial	<b>8</b>
Denied	<b>7</b>
Withdrawn	<b>0</b>
Total Number of Disregards	<b>45</b>

# Disregards - Common Errors



Access to Information and  
Protection of Privacy Act, 2015

**Section 21**



# Disregards– Common Errors

## Business Day Mix Up



- Excluding the wrong holidays from the business day count

**The Fix:** Unsure what holidays count, double check using resources or call OIPC.



# Disregards– Common Errors

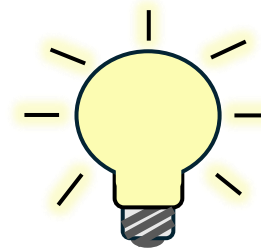
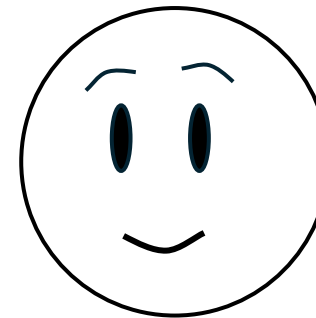
## Business Day Mix Up

- Excluding the wrong holidays from the business day count

**The Fix:** Unsure what holidays count, double check using resources or call OIPC.

Access to Information and  
Protection of Privacy Act, 2015

Section 21



OIPC will even  
send me extras  
while supplies last!

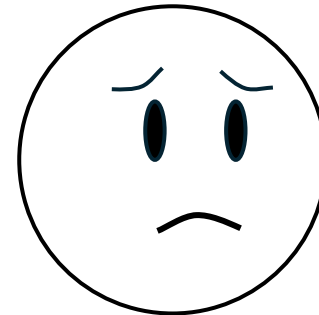


# Disregards– Common Errors

## Difficult vs. Disregardable

- Applying for a disregard because looking for the records will be difficult

Ugh...those records might be in one of the boxes in the basement. Searching is going to be a pain.



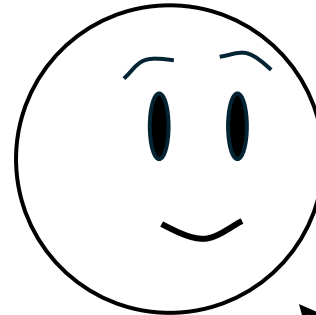
# Disregards – Common Errors

## Difficult vs. Disregardable

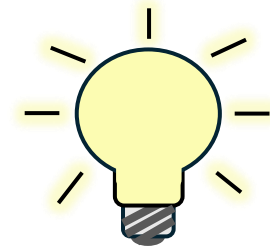
- Applying for a disregard because looking for the records will be difficult

**The Fix:** Remember that being difficult doesn't automatically make something disregardable.

**Unsure?** Maybe OIPC's guidance will help.



I'll review OIPC's guidance on disregards.



Maybe I should look into getting a time extension instead.

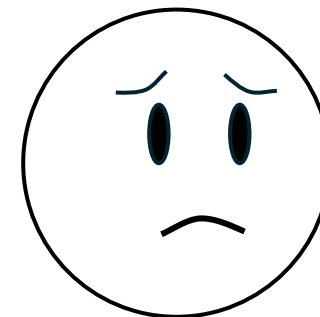


# Disregards– Common Errors

## Nonexistent Records or Exceptions Apply

- Applying for a disregard because the records don't exist, or because they'll be withheld under one of the access exceptions

These don't even exist! Better send in the disregard application.



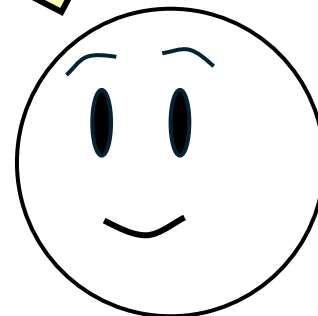
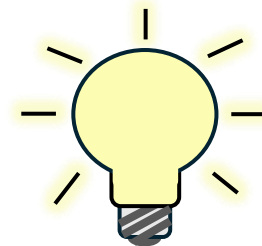
# Disregards– Common Errors

## Nonexistent Records or Exceptions Apply

- Applying for a disregard because the records don't exist, or because they'll be withheld under one of the access exceptions

**The Fix:** Remember that records not existing and the fact that the access exceptions will apply to those records doesn't automatically make something disregardable. **Unsure?** Maybe OIPC's guidance will help.

I did my search and these records don't exist. I'll put that in my final response.



# Disregards – Common Errors

## Nonexistent Records or Exceptions Apply

- Applying for a disregard because the records don't exist, or because they'll be withheld under one of the access exceptions

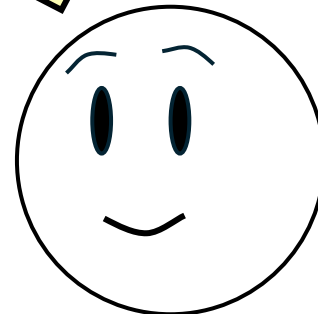
**The Fix:** Remember that records not existing and the fact that the access exceptions will apply to those records doesn't automatically make something disregardable. **Unsure?** Maybe OIPC's guidance will help.

**Pro-Tip:** Don't assume there are no records. Do the search!



OIPC Guidance:  
[Reasonable Search](#)

I did my search and these records don't exist. I'll put that in my final response.



# OIPC Resources

## Time Extensions

- Form: [Time Extension Application](#)
- Guidance: [Requesting a Time Extension](#) (Section 23)
- Guidance: [Extraordinary Circumstances](#) (Section 24)
- Above Board Newsletter Article: [Time Extensions](#) (April 2025)

## Disregards

- Form: [Disregard Application](#)
- Guidance: [Applying to the Commissioner for Approval to Disregard an Access to Information Request](#) (Section 21)
- Above Board Newsletter Article: [The Information Desk: Applications to Disregard Access Requests](#) (April 2026)

## Legislation:

[Access to Information and Protection of Privacy Act, 2015](#)

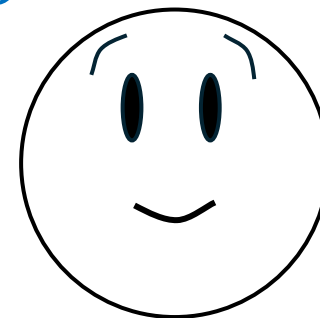
## “Business Day”

- ATIPP Office Guidance: [Timelines – Business Days](#)
- OIPC Webpage Tool: [Estimated Response Time Calculator](#)
- OIPC **FREE** Wall Calendar: Email [commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca)



# Questions

Access to Information and  
Protection of Privacy Act, 2015





OFFICE OF THE INFORMATION  
AND PRIVACY COMMISSIONER  

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NEWFOUNDLAND AND LABRADOR

# Thank You

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[www.oipc.nl.ca](http://www.oipc.nl.ca)

1.877.729.6309

[commissioner@oipc.nl.ca](mailto:commissioner@oipc.nl.ca)