

CAFII Consultations / Submissions Timetable

2022-2024

New Items since the Last EOC Meeting:

CAFII Submission on the AMF Consultation on « Issues and Discussion Paper : Best Practices for the responsible use of AI in the Financial Sector» June 14, 2024

Regulatory Issue	Deliverable	Deadline	Accountable
Financial Consumer Agency of Canada (FCAC)	 CAFII submission on "Proposed Guideline on Appropriate Products and Services For Banks and Authorized Foreign Banks" 	• January 6/22	 Mkt Conduct & Licensing Committee; ED to monitor
	 CAFII meets virtually with FCAC staff executives to present highlights of submission on "Proposed Guideline on Appropriate Products and Services For Banks and Authorized Foreign Banks" 	January 15/22	
	FCAC virtual meeting with K. Martin and B. Wycks to present its decisions on elements in CAFII's submission on "Proposed Guideline"	February 17/22	
	 FCAC releases final version of "Guideline on Appropriate Products and Services For Banks and Authorized Foreign Banks" 	February 24/22	
	 Presentation of 2023 Research Results-focused PowerPoint deck to FCAC Staff Executives Submission to FCAC on its consultation on the Proposed Guideline on CHPs for Trust and Loan Companies and Insurance Companies. 	 Q1 2024 February 5, 2024 	
BC Ministry of Finance 10- Year Review of FIA (Public Consultation Paper issued June/15); and Resulting Restricted Insurance Agency (RIA) Licensing Regime To Be Developed and Launched By Insurance Council of BC	 Ministry releases consultation paper on introducing a Restricted Insurance Agent licensing regime in BC (October 3/22 submission deadline) 	• June 30/22	
	 CAFII submission on BC RIA licensing regime consultation paper Ministry advises that Rule to empower RIA Regime and ensuing Insurance Council implementation work to 	October 3/22January 13/23	 Mkt Conduct & Licensing Committee; ED to monitor
	 be developed by Spring 2023 Insurance Council of BC arranges early consultation meeting with CAFII re RIA regime 	• May 8/23	
	 CAFII meets in-person/hybrid with BC Ministry of Finance; and with Insurance Council of BC, as part of 2023 Western Canada Tour 	• June 13 and June 14/23	
	 CAFII response submission on Insurance Council of BC Rule(s) developed to create framework for and implement Restricted Insurance Agency regime in BC (following Ministry of Finance Summer 2023 release of Council-empowering Regulation) 	• Q4 2023 thru Q2 2024 (expected)	
	 CAFII meetings with Insurance Council of BC around Rules for RIA regime Plan to make a written submission on Insurance Council of British Columbia's "Restricted Agency 	 Q4 2023 thru Q2 2024 April 24, 2024 	
	Performance Requirements Framework ["] CAFII submission on BCFSA's "Draft Insurer Code of Market Conduct"	September 9/22	
	 CAFII submission on Two Follow-up Questions from BCFSA on Its Draft Insurer Code 	 November 11/22 	 Mkt Conduct & Licensing Committee; ED to monitor
	BCFSA releases update promising update report on 'Insurer Code of Market Conduct' in 2023	December 15/22	
British Columbia Financial Services Authority (BCFSA)	 BCFSA holds short virtual meeting with CAFII to advise re how it intends to proceed with a BC "Insurer Code of Market Conduct 	• May 8/23	
	CAFII meets in-person/hybrid with BCFSA, as part of 2023 Western Canada Tour	• June 13/23	
	 BCFSA releases final version of its principles-based BC Insurer Code of Market Conduct (derived from CCIR/CISRO Guidance: Conduct of Insurance Business and Fair Treatment of Customers) 	• July 10/23	
	BCFSA's BC Insurer Code of Market Conduct to come into force	April 1/24	

Plan to make a written submission on Insurance Council of British Columbia's "Restricted Agency Performance Requirements Framework"

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AMF: Quebec Bill 141 and Related Regulations (including Regulation Respecting Alternative Distribution Methods, RADM)	 CAFII submission on Draft 2 of 'Regulation Respecting Complaint Processing' CAFII and AMF resolve impasse issue re Regulation respecting Alternative Distribution Methods (RADM)'s applicability to credit card-embedded insurance benefits via an "unwritten understanding" that Fact Sheet and Notice of Rescission do not have to be distributed to card holders 	 February 15/23 February/March 2022 	
	 CAFII and AMF hold special purpose virtual meetings on AMF's 'Regulation Respecting Complaint Processing' (as outgrowth from quarterly one-on-one meetings of CAFII Board Chair and AMF Superintendent, Client Services and Distribution Oversight) CAFII and AMF hold special purpose virtual meeting on purpose behind AMF's gathering of CAFII member 	 May 11/23 and June 21/23 	• Mkt Conduct & Licensing Committee; ED to monitor
	 CAFIT and AMF hold special purpose with a meeting of purpose beining AMF signification of CAFIT member company statistics on claims denial rates and "return of premium" to customers CAFII and AMF begin dialogue, via a quarterly CAFII Board Chair/AMF Supt. one-on-one meeting, about AMF possibly relaxing/amending/dropping requirement to complete runoff termination of in-force CPI spousal 	 June 8/23 July 4/23; and October 	
	 coverage by January 1/25 CAFII submits RSM Canada report on attrition of spousal policies to AMF staff executives 	18/23	
	 Substrate test for veroinque marter, anderate de la substrate des pranques commerciales, on the issue of spousal policy coverage—submitted on March 6, 2024 CAFII Meets with AMF on the cancellation of spousal coverages 	 January 8, 2024 April 29, 2024 	
	 CAFII Submission on the AMF Consultation on « Issues and Discussion Paper : Best Practices for the responsible use of AI in the Financial Sector» June 14, 2024 	• June 14, 2024	
CCIR/CISRO	 CAFII submission on CCIR/CISRO proposed "Incentives Management Guidance" CAFII written submission on CCIR's Draft 2023-2026 Strategic Plan (following preliminary feedback provided via Virtual Stakeholder Session on November 4/22) 	November 30/22December 15/22	 Mkt Conduct & Licensing Ctte; ED to monitor
	 CCIR releases "2021 Annual Statement on Market Conduct Public Report" CAFII in-person/hybrid stakeholder meeting with CCIR/CISRO Incentives Management Committee re questions/clarifications around final "Incentives Management Guidance" published in November 2022 	February 28/23February 28/23	
	 CAFII makes submission (in both official languages) on CISRO's embargoed Consultation Draft of 2023-2026 Strategic Plan 	• April 21/23	
	 CISRO releases final version of 2023-2026 Strategic Plan CAFII submission to CCIR consultation on "Type and Nature of Complaints to Be Disclosed Through Annual Statement on Market Conduct Report Tool" 	 October 3/23 November 3/23 (extended to November 17/23) 	
FCNB Insurance Act Rewrite and Introduction of RIA Regime	 FCNB Releases "Proposed Rule INS-001: Insurance Intermediaries Licensing and Obligations" for consultation, with February 7/22 submission deadline 	November 2021	• Mkt Conduct & Licensing Ctte; ED to monitor
	 CAFII submission on FCNB's "Insurance Act Rewrite: Questions For Industry, Dec.'21" CAFII submission on Proposed Rule INS-001: Insurance Intermediaries Licensing and Obligations 	January 31/22February 7/22	
	 CAFII submission on Proposed Rule INS-002: Insurance Fees CAFII submission on FCNB legislative change proposals re Life Insurance and Accident & Sickness Insurance sections of Insurance Act (informal sounding board consultation) 	February 18/22May 20/22	
	• FCNB releases 'Notices to Industry' on coming into force of final versions of Rule INS-001 and Rule INS-002 (having received Ministerial approval) on February 1/23	• December 13-14/22	
	ECNB Rules INS-001 and INS-002 come into force.	February 1/23	

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	CAFII meets with FCNB to discuss implementation questions/clarifications re Rule INS-001	February 24/23	
	• At CAFII's behest, FCNB removes RIR licence applicant requirements to submit Disclosure Forms and Criminal Record Checks for Board Directors	• March 9/23	
	 FCNB grants CAFII request for deadline extension (60 days to June 30/23) for filing initial RIR licence application on FCNB Portal; exempts OSFI- and FCNB-regulated RIR licensees from having to maintain trust accounts; and clarifies RIR licence application issues 	• April 14/23	
	 CAFII delegation meets with FCNB Superintendent of Insurance and other staff executives for relationship- building and, in part, to discuss lingering problems/issues re INS Rule-001 and RIR regime, as part of Fall 2023 Atlantic Canada tour 	• September 22/23	
	 <u>CAFII written submission to FCNB on ongoing/lingering concerns about Rule INS-001, and problems with</u> <u>FCNB licensing portal for obtaining an RIR licence—Submitted on March 6, 2024</u> 	• March 6, 2024	
	CAFII responds to FSRA "Information Guidance on Complaints Resolution" consultation	February 15/22	
	CAFII submission on FSRA's "Principles-Based Regulation" consultation document	• April 29/22	
	CAFII submission on FSRA's "Principles of Conduct for Insurance Intermediaries"	 May 3/22 	
	CAFII submission on FSRA's "Use of Retained Revenues Guidance"	 May 31/22 	
Financial Services Regulatory Authority of Ontario (FSRA) Regulatory Consultations	FSRA provides feedback on CAFII's submission on "Use of Retained Revenues Guidance"	• Sept 9/22	
	CAFII submission on FSRA's Proposed 2023-24 Statement of Priorities and Budget	November 15/22	 Mkt Conduct & Licensing Ctte; ED to monitor
	CAFII submission on FSRA's "Proposed Rule 2022-001: Assessments and Fees"	February 27/23	
	 CAFII decides not to make a submission on FSRA's "Proposed Guidance on IT Risk Management", determining it to be largely ``out of scope`` 	• March 31/23	
	• FSRA launches consultation on "Proposed Guidance: Administrative Monetary Penalties" with May 31/23 submission deadline	• March 27/23	
	CAFII submission on FSRA's "Proposed Guidance: Administrative Monetary Penalties"	 May 31/23 	
	 FSRA releases significantly rewritten final version of "Proceeds of Enforcement Guidance" (formerly "Proposed Guidance: Administrative Monetary Penalties) 	October 12/23	
	• CAFII response submission to FSRA's consultation on "Proposed 2024-25 Statement of Priorities and Budget"	November 13/23	
	<u>CAFII response submission to FSRA's consultation on Proposed Approach to Strengthening Protection of Vulnerable Consumers – Consultation – Submitted on March 8, 2024</u>	• March 8/24	
Ministry of Finance, Government of Ontario	• CAFII Submission on Government of Ontario Consultation on reducing the minimum consultation period for FSRA from 90 days to 60 days	December 4/23	Mkt Conduct & Licensing Ctte; ED to monitor