

**Critical Path for CAFII Response Submission on FSRA Consultation on Proposed Rule [2020-002] – Unfair or Deceptive Acts or Practices,
with March 18/21 Submission Deadline**

FSRA is replacing an existing FSCO regulation on Unfair or Deceptive Acts or Practices with a new Rule of its own, which will give it more flexibility to enforce its expectations and provide greater clarity on expectations of the industry. CAFII intends to make a formal written submission in response to this consultation, with some prior comments from the EOC suggesting that we will be largely supportive of this initiative. A key message to FSRA will be to make the language and clauses in the UDAP rule fully consistent with existing language and clauses in other FSRA regulations, including the *CCIR/CISRO Guidance: Conduct of Insurance Business and Fair Treatment of Customers*.

Task	Responsible	Timing/Deadline
Prepare Critical Path for CAFII submission on FSRA Consultation on Proposed Rule [2020-002] – Unfair or Deceptive Acts or Practices, and post for February 23/21 EOC Meeting.	B. Wycks	February 19/21
Prepare, refine, and disseminate Draft 1 of CAFII submission on FSRA Consultation on Proposed Rule [2020-002] – Unfair or Deceptive Acts or Practices to all Market Conduct & Licensing Committee Members.	K. Martin/B. Wycks	February 24/21
Consult With Chair Brad Kuiper and then arrange and confirm two virtual meetings of Market Conduct & Licensing Committee to review and refine draft CAFII submission. First meeting to occur Thursday, February 25, Friday, February 26, or Monday, March 1. Second meeting to occur Thursday, March 4, Friday, March 5, or Monday, March 8. Include draft CAFII submission and Critical Path in Meeting Invitation for first meeting; and Critical Path alone in Meeting Invitation for second meeting.	A. Lin	February 24/21
Provide feedback on Draft 1 of CAFII submission during first meeting of Market Conduct & Licensing Committee.	Market Conduct & Licensing Committee members	February 25, 26, or March 1/21
Revise draft CAFII submission to incorporate feedback from committee and disseminate Draft 2 to Market Conduct & Licensing Committee members.	K. Martin/B. Wycks	March 3/21
Provide feedback on Draft 2 of CAFII submission in second meeting of Market Conduct & Licensing Committee.	Mkt. Conduct Cttee	March 4, 5, or 8/21
Revise draft CAFII submission to incorporate feedback form committee and disseminate Draft 3 to Market Conduct & Licensing Committee and EOC members, with a Tuesday, March 16/21 end of day deadline for feedback.	K. Martin/B. Wycks	March 10/21
While awaiting CAFII member feedback on Draft 3, meet with Brent Mizzen, Luke O'Connor or other relevant CLHIA staff executive to discuss respective Association draft submissions, to check for general alignment and harmony.	K. Martin/B. Wycks	March 10-15/21
Provide feedback to K. Martin and B. Wycks on Draft 3 of CAFII submission.	Mkt. Conduct Cttee & EOC members	March 16/21

February 19, 2021

Task	Responsible	Timing/Deadline
Make final edits to draft submission, based on Market Conduct Committee and EOC input and on touch base/comparison check with CLHIA; and circulate penultimate Draft 4 to EOC Chair R. Dobbins and Mkt. Conduct & Licensing Ctte. Chair B. Kuiper for final review and approval.	B. Wycks/K. Martin	March 17/21 by 2:00 p.m.
Provide final feedback to K. Martin and B. Wycks on Draft 4 of CAFII submission	R. Dobbins and B. Kuiper	March 18/21 by 3:00 p.m.
Finalize submission, insert EOC Chair's electronic signature, and transmit to FSRA.	K. Martin	March 18/21