

**Agenda Item 5(b)(i)(4)**  
**April 13/21 Board Meeting**

**De :** Keith Martin <[Keith.Martin@cafii.com](mailto:Keith.Martin@cafii.com)>

**Envoyé :** 5 avril 2021 11:42

**À :** Nadeau, Marie <[Marieb.Nadeau@bnc.ca](mailto:Marieb.Nadeau@bnc.ca)>

**Cc :** Thompson, Peter <[Peter.Thompson@bnc.ca](mailto:Peter.Thompson@bnc.ca)>; Goncalves, Cecilia <[cecilia.goncalves@bnc.ca](mailto:cecilia.goncalves@bnc.ca)>;  
Brendan Wycks <[brendan.wycks@cafii.com](mailto:brendan.wycks@cafii.com)>

**Objet :** Request from CAFII Around Credit Card-Embedded Insurance Coverages and the RADM

Bonjour Marie,

I hope you have had a great long weekend.

In preparation for the upcoming 13 April, 2021 CAFII Board meeting, Board Chair Chris Lobbezoo; Vice Chair Peter Thompson; EOC Chair Rob Dobbins; and Brendan and I had a meeting last week to discuss the Agenda for the meeting, and one item we discussed was CAFII's possible next steps around the AMF's response letter on the RADM applying to credit card-embedded insurance coverages.

We believe that some CAFII members may have already been obligated by the AMF to comply with the RADM for credit card-embedded insurance coverages, and that those members might include National Bank Insurance and Desjardins Insurance (Peter Thompson asked me to write you about this matter, and I am also writing Isabelle Choquette at Desjardins a similar note).

Marie, would you mind confirming whether NBI has had to comply already with the RADM for credit card-embedded insurance coverages; and if so, how you did it?

If you can provide us with a one-page snapshot, we would like to include this (with your permission) in the Board meeting materials package, which we intend to send out Tuesday, 6 April (sorry for the short timeline). Alternatively, if you are able to provide such a one-page snapshot but need more time to put it together, we could alternatively share it with CAFII Board and EOC members a bit later, either shortly before or after the 13 April, 2021 Board meeting.

The thinking is that perhaps NBI was able to comply in a way that is less complicated and/or required fewer or less onerous IT changes than members fear; and, if so, other CAFII members could learn from your experience. In addition, the feeling was that perhaps the AMF is not expecting as much as we anticipate, and complying might not be as difficult as members think.

Some of the items we are hoping you could share with us, which would then be shared with the Board and EOC members, are:

- How did you deliver the required documents to customers, including the Fact Sheet? Were they delivered in-person, digitally, or on your website? (or via a combination of these?)

- Where a credit card has multiple embedded insurance benefits, did you have to deliver the Product Summary and Fact Sheet for each type of coverage separately (which is what the AMF response letter to CAFII, as I understand it, seems to imply)?
- How long did it take for you to implement the necessary changes?
- How did your process change?
- Have you had any negative customer experiences as result of the AMF-imposed changes?
- Did you have to make any IT changes?
- Has the AMF expressed any concerns with the Action Plan you proposed to comply with the RADM?
- Do you have any challenges around the AMF's related reporting obligations?
- Any other observations to share which might be helpful to CAFII members who need to comply by 17 September, 2021?

Thanks so much in advance for any information you can share, Isabelle. If you would like to have a teleconference or virtual meeting with Brendan and me, please let me know and I'll set it up.

Warm regards,

--Keith

**Keith Martin**

Co-Executive Director / Co-Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

**Response From Marie Nadeau, EOC Member From National Bank Insurance**

**From:** Nadeau, Marie <Marieb.Nadeau@bnc.ca>

**Sent:** April-05-21 1:55 PM

**To:** Keith Martin <Keith.Martin@cafii.com>

**Cc:** Thompson, Peter <Peter.Thompson@bnc.ca>; Goncalves, Cecilia <cecilia.goncalves@bnc.ca>;  
Brendan Wycks <brendan.wycks@cafii.com>

**Subject:** RE: Request from CAFII Around Credit Card-Embedded Insurance Coverages and the RADM

Hi Keith,

I hope that you had a good long weekend as well, we all needed it!

This subject was still being discussed between us and the AMF when you received the response from them.

We had initially prepared a lighter version of the Summary for the Credit-Card Embedded Insurance, as opposed to Mortgage Insurance Summary, for example: we didn't enumerate the eligibility criteria or the exclusions, we just referred to the certificate, etc.

We attach sample copies for your reference.

However, the AMF has recently proceeded with a review of all of our Summaries and commented that our Summaries for Credit Card Insurance did not comply with the regulation.

They have asked that we provide the same amount of information that we provide for other insurance products, despite the difficulties that you have already raised with the AMF.

So we were given a deadline to modify by year-end all of the Summaries - we will have the same challenges that all the other banks have.

Interesting to note: we did not attach the AMF Fact Sheet to these Summaries and the AMF has not commented on this element, not yet at least!

Should you wish to discuss this further, do not hesitate to contact me,

Kind regards,

Marie



**Marie Nadeau, LL.B.**  
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**Response From Isabelle Choquette, EOC Member From Desjardins Insurance**

**From:** Isabelle Choquette <isabelle.choquette@dsf.ca>

**Sent:** April-06-21 11:54 AM

**To:** Keith Martin <Keith.Martin@cafii.com>

**Cc:** André Langlois <andre.langlois@dsf.ca>; Johanne Dulude <Johanne.Dulude@dsf.ca>; Brendan Wycks <brendan.wycks@cafii.com>

**Subject:** RE: Request from CAFII Around Credit Card-Embedded Insurance Coverages and the RADM

Hello Keith,

Desjardins has not yet complied with the RADM.

You may recall that it was our intention to start working on the Summary in compliance with CAFII's July 2020 propositions to the AMF. To that effect, at the end of last year, André and I submitted our plan to Brendan and yourself.

Upon reflection, we decided to stick by CAFII and did not proceed with our plan. I know that Banque Nationale Assurances (Marie Nadeau) has posted its Summaries on its website; although, I think not the Fact Sheet.

We now have to find solutions to comply with the AMF's expectations. One of our main issues is the delivery in-person of the Summary and Fact sheet to our clients.

Don't hesitate to call if you need more info on this.

Isabelle