DRAFT DMC Document
Overview of Proposed Committee Work on Industry Complaint Statistics
March 19, 2013

Does EOC support this DMC project?

Project: Develop repository of regulator/provincial complaint statistics and definitions for creditor/alternate distribution and provide context

I. Do we need to better understand what complaint reporting statistics are available for creditor and/or alternate distribution?
   a. Why is it important?
      • To enhance ability to respond to consultations or regulators
         o Know who is collecting the information
         o What the available data shows
      • Be able to show how low actual creditor insurance complaints are
   b. If we agree it is important, then DMC could:
      • Create a matrix of External Reporting Institutions definitions and statistics and update it regularly

II. Proposed Matrix of External Reporting Institutions of Creditor Insurance Complaints
   a. Who are the reporting institutions (e.g. mainly provinces and regulators
      • FCAC: Consumer provision: Bank complaints related to authorized insurance activities
      • FSCO: Insurers report the complaints.
      • AMF: Insurer reports the complaints.
      • Provinces:
            AB: Alberta Insurance Council annual report
            NB: Annual report (office of Consumer Advocate)
      • OLHI: Consumers contact OLHI – escalated complaints
      • OBSI: Bank complaints
      • CLHIA:
      • Others?
   b. What is a definition of a complaint?
      • Is it comparable across institutions?
   c. What information is reported?
      • How is it reported (i.e. website, annual report)
      • Frequency
      • Definition of types of complaints reported (level 1, 2, etc.)
      • What data compiled (i.e. alternate, or just creditor, or lumped with life and health, do we include travel)
   d. To enhance the usefulness of the data we will bring perspective of complaint data for traditional life & health and property & casualty insurance, e.g.
      • Compare complaints between creditor (alternate) and rest of L&H
      • Provide context, e.g. with number of insureds, premium amounts, etc
      • Where do we get this information to make the comparisons (e.g. CLHIA Alternate Distribution Survey)