

CAFII Board Meeting Agenda

Date: Tuesday April 8, 2025

Time: 3:00 – 5:00 p.m. EST

Chair: V. Gillis

Host: TD Insurance

Location: TD Terrace Conference Centre, 160 Front Street,
4th Floor, Watson Lake Room
Toronto, ON M5J 2L6

Meeting Link: [MS Teams](#)

Meeting Code: 234 671 607 683

Dial-In: 1-647-953-4180

1. Welcome, Call to Order, Meeting Confirmation and Board Constitution Matters	3:02 p.m.	Presenter	Action	Document
a. Welcome and Call to Order	3:02 p.m.	V. Gillis	Introduction	
b. Land Acknowledgement	3:03 p.m.	V. Gillis	Reflection	
c. Declaration of Meeting Properly Called and Constituted	3:04 p.m.	V. Gillis	Confirmation	
d. Approval of Agenda	3:05 p.m.	V. Gillis	Approval	
e. Introduction of Lara Doig, Senior Manager, Operations	3:06 p.m.	V. Gillis/ K. Martin/ L. Doig	Introduction	✓
f. Draft of Minutes of December 3, 2024, CAFII Board Meeting	3:07 p.m.	V. Gillis	Approval	✓
g. Draft Schedule of 2025 Meetings and Events	3:08 p.m.	V. Gillis	Approval	✓


2. Consent Items	3:08 p.m.	Presenter	Action	Document
a. Summary of Board and EOC Action Items				
b. Consultations/Submissions Timetable				
c. Regulator and Policy-Maker Visit and Communications Recap				
d. Committee Reports Addressing CAFII Priorities				

3. Financial Management	3:09 p.m.	Presenter	Action	Document
a. Draft CAFII 2024 Audited Financial Statements and Independent Auditor's Report Thereon	3:09 p.m.	H. Lopez	Update/ Discussion /Approval	✓ (2)
b. Timelines for Membership Approval of CAFII 2024 Audited Financial Statements	3:19 p.m.	L. Doig	Update	✓
c. CAFII Financial Statements as of February 28/25	3:21 p.m.	D. Hinnecke	Update /Approval	✓
d. Receipt of 2024 CAFII Member Dues Payments and Associate Dues Payments	3:26 p.m.	L. Doig	Update	
e. Operating Budget 2026: Option for Dues Increases	3:28 p.m.	K. Martin	Update/ Discussion	✓ (2)

4. Strategic and Regulatory Initiatives	3:33 p.m.	Presenter	Action	Document
a. Plans for a Segmentation Research Study with Pollara in 2025	3:33 p.m.	R. Jennings	Update	✓
b. Update on the Implementation of the Media Strategy	3:38 p.m.	W. Bairos	Update	✓ (2)
c. Update on the Meetings with the FCAC and the Department of Finance on March 17 th , 2025, Ottawa	3:48 p.m.	K. Martin	Update	✓ (3)
d. Update on Discussions with the Insurance Council of BC on the Accreditation of Training Materials for Representatives Operating Under a Corporate License (Restricted Insurance Agency Regime)	3:58 p.m.	K. Martin	Update	✓ (2)
e. Update on the Plans around 2025 Regulatory Tours to All Provinces in Canada	4:08 p.m.	L. Doig	Update	✓ (2)
f. Plans For Annual Members Luncheon on May 22/25 with a Panel of Three Lawyers: Stuart Carruthers (Stikeman Elliott); Jill McCutcheon (Torys); Koker Christensen (Fasken)	4:13 p.m.	L. Doig	Update	✓

g.	Plans for Immediately Ensuing April 8/25 Reception Event with Tolga Yalkin, CEO of BCFSA as Guest Speaker	4:16 p.m.	L. Doig	Update	✓
h.	Proposed Letter and Outreach to New FSRA CEO Dexter John	4:18 p.m.	K. Martin	Update	
i.	Open Discussion on the Implications of Tariffs and other initiatives from the United States on CPI and the Business Environment more Generally	4:23 p.m.	V. Gillis	Discussion	

5. Governance		4:33 p.m.	Presenter	Action	Document
a.	Launch of the New CAFII Intranet	4:33 p.m.	K. Martin	Update	✓
b.	Feedback from Robyn Jennings on 1-on-1 EOC Meetings	4:36 p.m.	R. Jennings	Update	
c.	Confirmation of Completion of the 2024 Annual Appraisal of CAFII Executive Director	4:39 p.m.	K. Kasperski	Update	

6. Read Only Items		4:41 p.m.	Presenter	Action	Document
a.	Two New CAFII Associates: Jennings Consulting; Global Excel Management				 (2)
b.	Publication of New CAFII Video on LIMRA Research and CPI				
c.	Final Internal-Only Detailed Word Document from Deloitte on Technology Trends and CPI				
d.	Letter to the AMF on its Interpretation of Statistics around CPI				
e.	AMF Operational Resilience Document, January 23, 2025				
f.	Managing Matters Acquisition by Association Headquarters				
g.	Joint CAFII, CLHIA, THIA Meeting with BCFSA on Outsourcing and "Adjusting" (February 11, 2025)				
h.	BCFSA Decision Not to Proceed with the Requirement for Life Insurance "Adjusters" to be Individually Licensed				
i.	Request for CAFII to Offer Input in a Virtual Meeting on Alberta Insurance Council Strategic Plan 2025-2028				
j.	April 1/25 Webinar on Results of the Deloitte Research on Technology Trends and CPI				
k.	April 2/25 Public Release of the CAFII Research Project with Deloitte				 (4)
l.	Update on the Enhanced RSM Canada Benchmarking Study (Q1 2025)				

7. In-Camera Session		4:41 p.m.	Presenter	Action	Document
a.	Update on Annual Performance Appraisal, CAFII Executive Director		K. Kasperski/ J. Burns		

Annual Members Luncheon 2025: Thursday, May 22/25, 11:30 to 2:30 p.m. EST, St. James Cathedral Centre Event Venue, 65 Church Street, Toronto, ON M5C 2E9

Next Board Meeting, Preceded by the Annual Meeting of Members: Tuesday, June 3/25, 2:30 to 5:00 p.m. EST (Hybrid), Hosted by RBC Insurance at 155 Wellington, Toronto, ON M5V 3K7, 11th Floor, Americas room

Briefing Note

CAFII BOD Meeting April 8, 2025—Agenda Item 1(a)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Welcome and Call to Order

Purpose of this Agenda Item—Introduction

Formal start of meeting.

Background Information

The meeting will be called to order by Board of Directors Chair Valerie Gillis.

Recommendation / Direction Sought—Introduction

Start of meeting.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 1(b)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Land Acknowledgment

Purpose of this Agenda Item—Reflection

To acknowledge all traditional lands and territories.

Background Information

CAFII Board Chair Valerie Gillis will deliver the land acknowledgment.

Recommendation / Direction Sought—Reflection

No action required.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 1(c)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Declaration of Meeting Properly Called and Constituted

Purpose of this Agenda Item—Confirmation

To declare the meeting properly called and constituted.

Background Information

The meeting will be called and constituted by CAFII Board Chair Valerie Gillis.

Recommendation / Direction Sought—Confirmation

This is an introduction item.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 05, 2025—Agenda Item 1(d)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Approval of Agenda

Purpose of this Agenda Item—Approval

Approval of the agenda.

Background Information

CAFII Board Chair Valerie Gillis will ask the Board to approve the agenda for the April 8/25 Board of Directors meeting.

Recommendation / Direction Sought—Approval

Board approval will be sought.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 05, 2025—Agenda Item 1(e)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Introduction of Lara Doig, Senior Manager, Operations

Purpose of this Agenda Item—Introduction

To welcome and introduce CAFII's new Senior Manager, Operations, Lara Doig.

Background Information

Board Chair Valerie Gillis and CAFII's Executive Director Keith Martin will welcome and introduce Lara Doig, CAFII's new Senior Manager of Operations. She will then have the opportunity to introduce herself.

Recommendation / Direction Sought—Introduction

No action required.

Attachments Included with this Agenda Item

One (1) attachment.



LARA DOIG
SENIOR MANAGER, OPERATIONS

Lara is an expert in project management and process improvement. Lara's experience is the first point of contact for large commercial clients in Insurance, Financial Institutions, Fintech and Real Estate. She has developed and maintained long-term partnerships, and has produced sales pitches and presentations to improve Adoption, Engagement and Technical Health. She has over 10 years of client and project management experience including maintaining strong relationships with customers, onboarding, contract renewal and account expansion. Lara has strong knowledge of business operations processes including Client Tech Stack, CRM platforms and data driven results.

Briefing Note

CAFII BOD Meeting April 05, 2025—Agenda Item 1(f)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Draft Minutes of December 3, 2024, CAFII Board Meeting

Purpose of this Agenda Item—Approval

To request approval from the Board for the December 3/24 Board Meeting draft minutes.

Background Information

Board Chair Valerie Gillis will request approval from the Board for the draft minutes of the December 3/24 Board Meeting.

Recommendation / Direction Sought—Approval

This is an approval item.

Attachments Included with this Agenda Item

One (1) attachment.

BOARD MEETING

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

In-Person/Hybrid Meeting at Chubb Life Insurance Company of Canada in Toronto, Ontario

Tuesday, December 3, 2024

3:00 to 5:00 p.m. EDT

Minutes

Board Members

Present In-Person:

Valerie Gillis	TD Insurance and Board Chair
Paul Cosgrove	Assurant and Board Vice Chair
Rohit Thomas	BMO Insurance
Louie Georgakis	The Canada Life Assurance Company
Rahul Kakar	Chubb Life Insurance Company of Canada
Andrew Kugler	Manulife Financial
Peter Thompson	National Bank Insurance
Julie Gaudry	RBC Insurance
Sarah Armstrong	CUMIS/The Co-operators
Konstance Allain	CIBC Insurance

Virtually:

Elizabeth Gandolfi	Canadian Western Bank
Simon Lacroix-Hubert	Desjardins
Wayne Hewitt	Scotia Insurance

Regrets:

Adam Vespi	Canadian Tire Bank
Nigel Branker	Securian Canada

Also Present:

Karyn Kasperski, Board Secretary
John Burns, Board Vice Secretary
Donald Hinnecke, Treasurer
Keith Martin, Executive Director
Robyn Jennings, Research Analyst
Wendy Bairos, Media Consultant
Troy Woodland, Association Coordinator

Item 1: Welcome, Call to Order, Meeting Confirmation and Board Constitution Matters

Item 1(a): Welcome and Call to Order

CAFII Board Chair Valerie Gillis welcomed all to this meeting of the CAFII Board of Directors, which was hosted by Chubb Life Insurance Company of Canada in Toronto, Ontario, as well as virtually. The meeting was called to order at 3:00 p.m. CAFII's Research Analyst, Robyn Jennings, acted as Recording Secretary.

Item 1(b): Land Acknowledgement

CAFII Board Chair Valerie Gillis Thompson shared a land acknowledgement for the meeting.

Item 1(c): Declaration of Meeting Properly Called and Constituted

Board Secretary Karyn Kasperski confirmed that there was a quorum of Board members present for the meeting, with 10 members present in person and 3 members present virtually, and that the meeting had been properly called and constituted. Board Chair Valerie Gillis declared the meeting properly convened and constituted.

Item 1(d): Approval of Agenda

*On a motion duly made, seconded, and unanimously carried, **IT WAS RESOLVED** that the meeting Agenda be and is approved.*

Item 2: Consent Items

*On a motion duly made, seconded, and unanimously carried, **IT WAS RESOLVED** that the Consent Agenda items itemized below be and are approved or received for the record, as indicated in the Action column in the Consent section of the agenda.*

- a. Draft Minutes of October 8/24 CAFII Board Meeting
- b. Summary of Board and EOC Action Items
- c. October & November Regulatory Update
- d. Consultations/Submissions Timetable
- e. Regulator and Policy-Maker Visit Plan Recap
- f. Committee Reports Addressing CAFII Priorities
- g. EOC-Approved CAFII 2025 Schedule of Meetings and Events

*Further, **IT WAS RESOLVED** that the minutes of the meeting of the CAFII Board of Directors held October 8, 2024, be and are adopted in the form presented and that copies of those minutes be signed and placed in the corporation's minute book.*

Item 3: Financial Management

Item 3(a): CAFII Financial Statements as at October 31/24

CAFII Treasurer Donald Hinnecke provided an overview of the Association's financial statements as at October 31/24, noting that the Association's finances are above plan. CAFII is in a strong financial position going into 2025, with a healthy balance sheet and income statement. Revenue is above budget expectations due to new membership, along with higher investment earnings than expected. Furthermore, expenses are down due to effective expense management and reduced staffing (net savings in terms of salary expenses due to the departure of CAFII's Operations Manager and the delay in replacing that role). In terms of website costs,

K. Martin was able to negotiate all website deliverables to fall under \$70K, meaning CAFII will have a net saving of nearly \$30K from what was in the original budget. In terms of the current trajectory, CAFII is projecting a \$16K surplus by December 3/24 and is in a healthy cash position for the year's end.

K. Martin mentioned that the unexpected and erroneous deposit of \$452K into the CAFII bank account has been resolved and all funds have been returned to the correct bank. CAFII will continue to monitor the situation closely.

*On a motion duly made, seconded, and unanimously carried, **IT WAS RESOLVED** that the CAFII financial statements as at October 31/24 be and are approved.*

Item 3(b): CAFII Forecast as at October 31/24

CAFII Treasurer Donald Hinnecke provided an overview of the organization's forecast as of October 31/24, noting that revenue is above expectations—\$975K versus the expected \$931K. This is thanks to higher investment income and higher associate and member dues. There will be a one-time recruitment cost to help replace the missing staff, but lower salary costs will offset this. SEO and website enhancements have cost less than originally budgeted. Furthermore, several expenditures did not occur, including legal costs and staffing expenses. K. Martin is currently interviewing people for the Operations Manager position and feels he may have found someone to fill the role. Because of the urgency around filling the role and the addition of the word Senior to the Operations Manager title, the salary will likely increase by up to \$8K. K. Martin did remark that if the candidate does not work out then CAFII may have to go back to market. The annual member's luncheon did have a higher cost than expected due to higher attendance and a general increase in the cost of hosting receptions. By year's end, CAFII is projected to have a \$20K surplus versus the budgeted \$96K loss. All in all, CAFII is in a strong financial position. November and December will likely have higher expenses, meaning the surplus may be less than \$20K, but the Association's finances remain stable. CAFII is currently sitting on 65% financial reserves while the target is between 25%-50%.

Item 3(c): CAFII 2025 EOC-Endorsed Operating Budget, including a Motion to Authorize the Board Chair and Vice Chair to Approve the Salary Adjustments for CAFII Staff at a Later Date

CAFII Executive Director Keith Martin informed the Board that the EOC endorsed CAFII's 2025 Operating Budget. He then explained that the philosophy adopted to draft the Operating Budget focused on the implementation of the key elements of the 2025 3–5-year strategic plan. This budget allows for investments in staffing, continued Managing Matters support, a media consultant to implement the media strategy, major annual research projects, continued maintenance of regulator relationships through meetings and regulatory tours, funds for the annual members' luncheons and the EOC appreciation dinner, and funds for industry.

The Operating Budget does reveal a systemic gap in revenues versus expenses; therefore, CAFII is reviewing the option to increase its membership costs, something it has not done since 2020. The membership increase is not urgent and will be discussed throughout 2025.

CAFII is anticipating a lower investment revenue of \$15K in 2025, due to lower interest rates. CAFII will have several higher expenses in 2025 than 2024, including a return to full staffing numbers. Managing Matters has also increased its fees, which has been deemed fair and reasonable in the current environment. Another

significant cost will be the return to regulatory tours. Furthermore, \$30K has been allocated for legal costs, but there is no indication that this will be spent.

[Action Item: Include Potential Membership Dues Increase on the April 3/25 Board Meeting Agenda for further discussion; K. Martin, April 2025].

*On a motion duly made, seconded, and unanimously carried, **IT WAS RESOLVED** that the CAFII 2025 EOC-Endorsed Operating Budget, including a motion to authorize the Board Chair and Vice Chair to Approve the Salary Adjustments for CAFII Staff at a later date, be and is approved.*

Item 4: Strategic and Regulatory Initiatives

Item 4(a): Federal Department of Finance Proposed Amendment to the Criminal Code to Include Insurance Costs in the Calculation of Interest

CAFII Executive Director Keith Martin informed the Board that, in November 2024, he contacted the Department of Finance for an update regarding CAFII's submission on the proposed amendments to the criminal code to include insurance costs in the calculation of interest. As of December 3/24, he has not heard back from the Department. This is not necessarily a bad thing and could instead indicate that the department is not moving forward with these proposed amendments at this time. K. Martin reached out to the CBA, who has also not heard back from the Department. K. Martin has been in contact with the CLHIA, which received a data request from the Department, to which CLHIA is preparing a response.

Tangentially, a *Globe and Mail* journalist, Erica Alina, is preparing an article on this issue. She has interviewed the Canadian Lenders Association and asked for K. Martin's and CLHIA's input. After some discussion on the appropriate course of action, the Board gave K. Martin permission to work with CAFII's Media Consultant, Wendy Bairos, to draft quotes for E. Alina. This permission is predicated on receiving feedback from the Board on the quotes.

[Action Item: Draft quotes on the Federal Department of Finance's proposed amendments to the Criminal Code to Include Insurance Costs in the Calculation of Interest for circulation to the Board for feedback before circulation to Globe and Mail Journalist Erica Alina; K. Martin, December 2024].

Item 4(b): Next Steps on the October 8, 2024, Presentation by the AMF to CAFII

CAFII Executive Director Keith Martin informed the Board that, at the last EOC meeting, there were concerns that the AMF's Mario Beaudoin had misinterpreted the information and statistics he received from CAFII members. Therefore, it was suggested that CAFII's Quebec Committee participate in a special-issue meeting to discuss and identify the key messages CAFII will share with the AMF. K. Martin is currently organizing a working group to determine the direction CAFII will take and to flesh out what positions will be shared with M. Beaudoin.

Item 4(c): Update on Plans to Visit FCAC and the Federal Department of Finance, in Ottawa

CAFII's Executive Director, Keith Martin, updated the Board on CAFII's plans to visit the FCAC and the federal Department of Finance in Ottawa. During the November EOC meeting, EOC members expressed a desire for CAFII to meet with both entities, ideally in February or March 2025. The Board supported K. Martin in setting up meetings in Ottawa with the FCAC and the federal Department of Finance in Ottawa in the new year.

Item 4(d): Update on the Research with Deloitte on Technology Trends and Artificial Intelligence

CAFII's Executive Director, Keith Martin, updated the Board on CAFII's research with Deloitte on technology trends and artificial intelligence. Deloitte has completed all interviews with CAFII members' executives and circulated a written survey to all participating members. Deloitte is now collecting the survey responses. In terms of timelines, Deloitte believes it will have the aggregated results by early January 2025. According to Deloitte, they have already found some important insights that will be of great interest to members and regulators.

Two companies decided not to participate in the survey. Deloitte will present company-specific findings to each participant; those who did not participate will not have this opportunity. The research intention at the end will be to have a special webinar, a press release for media pickups, and a presentation of the key findings to regulators over the regulatory tours. The Board will have a chance to review the findings as well; this will be a special webinar for the EOC and the Board prior to any decision to publicly release the research findings.

Item 4(e): Update on Expansion of Quarterly RSM Canada Benchmarking Study to Include HELOC Penetration Rates

CAFII's Executive Director, Keith Martin, updated the Board on CAFII's intention to expand the RSM Benchmarking study to include HELOCs. The quote for this has been received, which K. Martin negotiated down from the original request. The lower cost was accepted by RSM Canada, which has now begun working on the study. The first draft is expected for Q1 2025.

Item 4(f): Update on Hiring of New Senior Manager, Operations

This item was included and discussed in the update for Agenda Item 3(b).

Item 5: Governance

Item 5(a): EOC-Endorsed Policy Around Who Can Join CAFII Committees

EOC Chair Karyn Kasperski informed the Board of the EOC-Endorsed policy around who can join CAFII's committees. In short, the proposed policy established three principles: 1) all members must be actively employed members with a member company, 2) all members must receive approval from a sitting Board member of a member company approving their participation in CAFII's committee(s), and 3) if the person is leaving CAFII's member company, regardless of the reason, they must leave CAFII and any committees and/or sub-committees. This policy also requires communication from Board members of any impending retirements and/or departures so that CAFII can adjust committee numbers. This policy was presented to the EOC at the October EOC meeting and was endorsed for Board approval.

On a related matter, there was a request for CAFII to distribute to all Board members early in the new year the list of volunteers currently serving on CAFII Committees and Working Groups.

*On a motion duly made, seconded, and unanimously carried, **IT WAS RESOLVED** that the CAFII's EOC-Endorsed Policy Around who can join CAFII's Committees be and is approved.*

[Action Item: Distribute List of Each Member Volunteers on CAFII Committees and Working Groups; K. Martin, January 2025].

Item 5(b): Summary Results of the DEI Survey with CAFII Members

On behalf of CAFII's Research Analyst, Robyn Jennings, CAFII's Executive Director, Keith Martin, shared with the Board the summary results of the DEI Working Group's DEI survey of CAFII members. A DEI-focused survey was sent to CAFII's 15 member companies, 13 of which participated. R. Jennings aggregated the results into two documents – a survey summary and a series of graphs depicting the results.

The key finding was that all the participating members are actively involved in DEI. Therefore, CAFII did not need to develop its own DEI policies for members. K. Martin went on to explain the survey's graphs. Chair of the DEI Working Group, Tejal Harri-Morar, added that, from the outset, the working group wanted to increase board diversity. Thus, as presented, the survey shows that CAFII members have strong DEI programs in place, including strong Board representation. The working group has, therefore, achieved its goal. K. Martin and T. Harri-Morar suggested that the Working Group be disbanded. DEI will remain a priority for CAFII and its committees.

*On a motion duly made, seconded, and unanimously carried, **IT WAS RESOLVED** that the CAFII's recommendation to dissolve the Diversity, Equity, and Inclusion Working Group be and is approved.*

Item 5(c): EOC-Endorsed Proposal to Wind-Down the DEI Working Group Now that it Has Achieved its Objectives

This item was included and discussed in Agenda item 5(b).

Item 5(d): Update on Website Investments, Including Videos on LIMRA Research and Rebuild of Backend

CAFII's Executive Director, Keith Martin, informed the Board that CAFII has found a good vendor to rebuild the Association's website's backend. There are two important new goals for the backend: 1) it must have a document repository for all Board and EOC meetings and regulatory issues, and 2) it must be easy to navigate. K. Martin will provide another update in the early new year when the backend is anticipated to be completed.

CAFII's new video company is nearly done creating one of two LIMRA research videos.

Additionally, CAFII now has an SEO vendor. In the coming months, K. Martin will be able to present far more regularly regarding CAFII's SEO progress.

Item 5(e): Update on Article for National Post

CAFII's Executive Director, Keith Martin, updated the Board on the article for the National Post. He explained that the article is a key step in CAFII's new media strategy. The article's primary focus is on publicizing and sharing with the public and regulators the results of CAFII's LIMRA research. When CAFII shared the LIMRA results previously, the response was overwhelmingly positive; the information gathered highlighted the importance of CPI and how it is needed to help fill a vital insurance gap. In fact, after a Board-approved press release of the research, CAFII received three trade media articles on the topic and hosted a webinar, which had 30 regulators in attendance.

CAFII's media strategy, which the National Post article is a part of, went through many iterations to arrive at the current version.

After K. Martin's update, a Board member expressed concerns about the article opening a channel for criticism and asked if there was a better way to publicize the research without inviting commentary from the media, suggesting a press package instead of an article. Board Chair Valerie Gillis explained that the objective of the article is to increase education and challenge misinformation. K. Martin added that journalists and media are a part of the desired readership because CAFII wants to educate them as well. The logic behind the article is to create a positive and informative article on CPI for journalists and consumers alike so that they have access to these perspectives when they are researching information about CPI. CAFII's Media Consultant, Wendy Bairos, explained that no one will ever be able to control the commentary in the media but that this should not dissuade CAFII from publicizing this information and offering its point of view.

After a lengthy discussion, it was agreed that a couple of areas within the article could be modified so that the message appears somewhat softer. The concerned Board members agreed to provide their edits to K. Martin by the end of the week (December 6/24) so CAFII can update the article and send it out in a timely manner.

[Action Item: Update the National Post article to reflect input and edits from Board members; K. Martin, December 2024].

[Action Item: Circulate updated National Post article to the Board for final input before socializing the article with the National Post; K. Martin, December 2024].

Briefing Note

CAFII BOD Meeting April 05, 2025—Agenda Item 1(g)

Welcome, Call to Order, Meeting Confirmation, and Board Constitution Matters — Draft Schedule of 2025 Meetings and Events

Purpose of this Agenda Item—Approval

To request approval from the Board for the draft schedule of CAFII's 2025 meetings and events.

Background Information

Board Chair Valerie Gillis will request the Board's approval of the draft schedule of CAFII's 2025 meetings and events.

Recommendation / Direction Sought—Approval

This is an approval item.

Attachments Included with this Agenda Item

One (1) attachment.

Draft Schedule of CAFII 2025 Meetings and Events

EOC Meetings: *To be held virtual-only and in-person/virtual-hybrid, in alternating months*

- **Tuesday, January 21, 2025** (2:00–4:00 p.m. MS Teams virtual-only meeting)
- **Tuesday, February 25, 2025** (2:00–3:30 p.m. MS Teams virtual-only meeting)
(Family Day Stat Holiday in Ontario: Monday, February 17)
- **Tuesday, March 25, 2025** (2:00–3:30 p.m. MS Teams virtual-only meeting)
(Quebec Spring Break: March 3 – March 7. Ontario March Break: March 10 – March 14)
- **Thursday, April 24, 2025** (2:00–4:00 p.m. in-person/virtual-hybrid meeting)
(Passover: Sunday, April 13 – Sunday, April 20. Good Friday: Friday, April 18. Easter Monday: Monday, April 21)
- **Tuesday, May 27, 2025** (2:00–3:30 p.m. MS Teams virtual-only meeting)
(Victoria Day Stat Holiday: Monday, May 19. CLHIA Conference in PEI: May 13 – May 16)
- **Tuesday, June 24, 2025** (2:00–4:00 p.m. MS Teams virtual-only meeting)
- **Tuesday, July 22, 2025** tentative summer meeting (2:00–3:30 p.m. MS Teams virtual-only meeting)
- **Tuesday, August 19, 2025** tentative summer meeting (2:00–3:30 p.m. MS Teams virtual-only meeting)
(Civic Stat Holiday: Monday, August 4)
- **Thursday, September 18, 2025** (3:00–5:00 p.m. in-person/virtual-hybrid meeting, followed by EOC Annual Appreciation Dinner)
(Labour Day: Monday, September 1. Rosh Hashanah: September 22 – 24. Yom Kippur: October 1 – 2. National Day for Truth and Reconciliation: Saturday, September 30)
- **Tuesday, October 21, 2025** (2:00–3:30 p.m. MS Teams virtual-only meeting)
(Thanksgiving Stat Holiday: Monday, October 13, Diwali: Monday, October 20)
- **Tuesday, November 18, 2025** (2:00–4:00 p.m. MS Teams virtual-only meeting)
(Remembrance Day: Saturday, November 11)

Board Meetings:

- **Thursday, April 8, 2025** (3:00–5:00 p.m. in- person/virtual-hybrid meeting, followed by ensuing Reception)
(Passover: Saturday, April 13 – Sunday, April 20. Good Friday: Friday, April 18. Easter Monday: Monday, April 21)
HOST: TD Insurance (at TBD)
- **Tuesday, June 8, 2025** (2:30–5:00 p.m. in- person/virtual-hybrid meeting, preceded by 2023 Annual Meeting of Members and followed by ensuing Reception).
HOST: RBC Insurance (at TBD)
- **Tuesday, October 7, 2025** (2:20–4:00 p.m. in- person/virtual-hybrid meeting, immediately following liaison lunch and Industry Issues Dialogue with AMF staff executives)
HOST: Desjardins (at TBD)
- Tuesday, December 4, 2025** (3:00–5:00 p.m. in- person/virtual-hybrid meeting, followed by Holiday Season/Year-End Reception)
HOST: CIBC Insurance (at TBD)

2025 Annual Members and Associates Luncheon:

- *Thursday, May 22, 2025 from 11:30 a.m. EST to 2:30 p.m. EST at St. James Cathedral Centre Event Venue, 65 Church St., Toronto*

2025 EOC Annual Appreciation Dinner:

- *Tentative Date: Thursday, Sept 18, 2025 at 5:30 p.m. at a TBD location*

Webinars:

- January 29 or 30, 2025
- March 26 or 27, 2025
- April 23 or 24, 2025
- September 24 or 25, 2025
- October 22 or 23, 2025
- November 26 or 27, 2025

Recent Years' Board Meeting Host's

2024 Board meetings Hosted by:

- **Date:** *Tuesday, April 9, 2024 from 3:00 p.m. – 5:00 p.m. EDT*
 - **Host:** *Assurant Canada*
- **Date:** *Tuesday, June 4, 2024 from 2:30 p.m. – 5:00 p.m. EDT*
 - **Host:** *Securian Canada*
- **Date:** *Tuesday, October 8, 2024 from 2:20 p.m. – 4:00 p.m. EDT*
 - **Host:** *National Bank Insurance*
- **Date:** *Tuesday, December 3, 2024 from 3:00 p.m. – 5:00 p.m. EDT*
 - **Host:** *Chubb Life Insurance Company of Canada*

2023 Board meetings Hosted by:

- **Date:** *Tuesday, April 4, 2023 from 3:00 p.m. – 5:00 p.m. EDT*
 - **Host:** *Canadian Tire Bank*
- **Date:** *Tuesday, June 6, 2023 from 2:30 p.m. – 5:00 p.m. EDT*
 - **Host:** *Manulife Financial*
- **Date:** *Tuesday, October 10, 2023 from 2:20 p.m. – 4:00 p.m. EDT*
 - **Host:** *RBC Insurance*
- **Date:** *Tuesday, December 5, 2023 from 3:00 p.m. – 5:00 p.m. EDT*
 - **Host:** *Scotia Insurance*

2022 Board meetings Hosted by:

- **Date:** Tuesday, April 12, 2022 from 2:00 p.m. – 4:00 p.m. EDT
 - **Host:** No host as it was held virtually
- **Date:** Tuesday, June 7, 2022 from 2:20 p.m. – 5:00 p.m. EDT
 - **Host:** BMO Insurance
- **Date:** Tuesday, October 11, 2022 from 2:20 p.m. – 4:00 p.m. EDT
 - **Host:** Desjardins Insurance
- **Date:** Tuesday, December 6, 2022 from 3:00 p.m. – 5:00 p.m. EDT
 - **Host:** CIBC Insurance

2021 Board meetings Hosted by:

- **Date:** Tuesday, April 12, 2021 from 2:00 p.m. – 4:00 p.m. EDT
 - **Host:** No host as it was held virtually
- **Date:** Tuesday, June 7, 2021 from 2:20 p.m. – 5:00 p.m. EDT
 - **Host:** BMO Insurance
- **Date:** Tuesday, October 11, 2021 from 2:20 p.m. – 4:00 p.m. EDT
 - **Host:** Desjardins Insurance
- **Date:** Tuesday, December 6, 2021 from 3:00 p.m. – 5:00 p.m. EDT
 - **Host:** CIBC Insurance

2021 Board meetings Hosted by:

- None, due to COVID-19 pandemic situation

2020 Board meetings Hosted by:

- None, due to COVID-19 pandemic situation

2019 Board meetings Hosted by:

- **Date:** Tuesday, April 16, 2019 from 3:00 p.m. – 5:00 p.m. EDT
 - **Host:** CUMIS
- **Date:** Tuesday, June 4, 2019 from 3:00 p.m. – 5:00 p.m. EDT
 - **Host:** Manulife Financial
- **Date:** Tuesday, October 1, 2019 from 1:05 p.m. – 4:00 p.m. EDT
 - **Host:** RBC Insurance
- **Date:** Tuesday, December 3, 2019 from 3:00 p.m. – 5:00 p.m. EDT
 - **Host:** TD Insurance

Recent Years' Annual Members and Associates Luncheons

2024 Annual Members and Associates Luncheon

Date: Tuesday, May 28, 2024 from 11:45 a.m. – 2:15 p.m. EDT

Topic: “The Changing Landscape – Reflections on Emerging Trends in the Marketplace for Life Insurance”

Speaker: Dominic Hains, President, CEO, RGA Canada

Venue: St. James Cathedral Centre Event Venue, 65 Church St., Toronto, Ontario

2023 Annual Members and Associates Luncheon

Date: Tuesday, May 9, 2023 from 11:45 a.m. – 2:15 p.m. EDT

Topic: “The changing Insurance Law and Regulatory Environment: Challenges, Risks, and Opportunities”

Speaker: Stuart Carruthers, Partner, Stikeman Elliot; Jill McCutcheon, Partner, Torys LLP

Venue: St. James Cathedral Centre Event Venue, 65 Church St., Toronto, Ontario

2022 Annual Members and Associates Luncheon

Date: Tuesday, November 9, 2022 from 1:00 p.m. – 2:30 p.m. EDT

Topic: “With Authority: Executing On A Bold Vision for A New Kind of Financial Services Regulator in Ontario; and Laying the Groundwork for Its Long-Term Success”

Speaker: Mark White, CEO, FSRA

Venue: St. James Cathedral Centre Event Venue, 65 Church St., Toronto, Ontario

2021 Annual Members and Associates Virtual Luncheon Webinar

Date: Tuesday, November 9, 2021 from 1:00 p.m. – 2:30 p.m. EDT

Topic: “The Changing Regulatory Environment – Challenges, Risks and Opportunities”

Panelists: Jill McCutcheon, Partner, Torys LLP; Stuart Carruthers, Partner, Stikeman Elliott LLP; Marc Duquette, Partner, Norton Rose Fulbright Corporation. Panel Moderator: Keith Martin, CAFII

Venue: Virtual-Only Webinar

2020 Annual Members and Associates Virtual Luncheon Webinar

Date: Wednesday, October 21, 2020 from 12 Noon to 1:00 p.m. EDT

Topic: “Setting the Bar Higher: How the Financial Consumer Protection Framework Sets a New Standard for Fairness and Transparency”

Speakers: Frank Lofranco, Deputy Commissioner, Supervision and Enforcement, Financial Consumer Agency of Canada (Remarks actually delivered by Teresa Frick, Director, FCAC who was subbed in for Frank Lofranco at the last minute)

Venue: Virtual-Only Webinar

Briefing Note

CAFII BOD Meeting 08 April 2025—Agenda Item 2(a-d) Consent Items

Purpose of this Agenda Item—Information Only

To provide documentation for the Board to review, which does not require updates, discussion, or decision-making.

Background Information

CAFII Board Chair Valerie Gillis will present the following consent items, none of which require any discussion or decision:

- a. Summary of Board and EOC Action Items
- b. Consultations/Submissions Timetable
- c. Regulator and Policy-Maker Visit and Communications Recap
- d. Committee Reports Addressing CAFII Priorities

Recommendation / Direction Sought—Information Only

Chair Valerie Gillis will call for a Board resolution to receive for the record Consent Items 2(a) through 2(d) via a single omnibus motion.

Attachments Included with this Agenda Item

No attachments.

Link: *CAFII April 8/25 BOD Meeting Consent Items - Google Drive Document Repository.*

This link includes documents for:

- [Summary of Board and EOC Action Items](#)
- [Consultations/Submissions Timetable](#)
- [Regulator and Policy-Maker Visit and Communications Recap](#)
- [Committee Reports Addressing CAFII Priorities](#)

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 3(a)

Financial Management – Draft CAFII 2024 Audited Financial Statements and Independent Auditor's Report Thereon

Purpose of this Agenda Item—Update/Discussion/Approval

To provide an update to the Board on the draft CAFII 2024 Audited Financial Statements and Independent Auditor's Report thereon, with the opportunity to discuss and approve the report.

Background Information

KMPG's Hudson Lopez will update the Board on the draft CAFII 2024 Audited Financial Statements and Independent Auditor's Report thereon. Afterwards, he will open the floor for questions, comments, and discussion. Once concluded, Board approval will be sought, depending on the feedback received.

Recommendation / Direction Sought—Update/Discussion/Approval

This is an update item with the opportunity for discussion. Board's approval will be sought.

Attachments Included with this Agenda Item

Two (2) attachments.

KPMG LLP
Bay Adelaide Center
333 Bay Street, Suite 4600
Toronto, ON M5H 2S5
Canada

April 8, 2025

We are writing at your request to confirm our understanding that your audit was for the purpose of expressing an opinion on the financial statements (hereinafter referred to as “financial statements”) of Canadian Association of Financial Institutions in Insurance (“the Entity”) as at and for the period ended December 31, 2024.

General:

We confirm that the representations we make in this letter are in accordance with the definitions as set out in **Attachment I** to this letter.

We also confirm that, to the best of our knowledge and belief, having made such inquiries as we considered necessary for the purpose of appropriately informing ourselves:

Responsibilities:

- 1) We have fulfilled our responsibilities, as set out in the terms of the engagement letter dated February 25, 2025, including for:
 - a) the preparation and fair presentation of the financial statements and believe that these financial statements have been prepared and present fairly in accordance with the relevant financial reporting framework.
 - b) providing you with all information of which we are aware that is relevant to the preparation of the financial statements (“relevant information”), such as financial records, documentation and other matters, including:
 - the names of all related parties and information regarding all relationships and transactions with related parties;
 - the complete minutes of meetings, or summaries of actions of recent meetings for which minutes have not yet been prepared, of shareholders, board of directors and committees of the board of directors that may affect the financial statements. All significant actions are included in such summaries.
 - c) providing you with unrestricted access to such relevant information.
 - d) providing you with complete responses to all enquiries made by you during the engagement.
 - e) providing you with additional information that you may request from us for the purpose of the engagement.

- f) providing you with unrestricted access to persons within the Entity from whom you determined it necessary to obtain audit evidence.
- g) such internal control as we determined is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error. We also acknowledge and understand that we are responsible for the design, implementation and maintenance of internal control to prevent and detect fraud.
- h) ensuring that all transactions have been recorded in the accounting records and are reflected in the financial statements.
- i) ensuring that internal auditors providing direct assistance to you, if any, were instructed to follow your instructions and that we, and others within the entity, did not intervene in the work the internal auditors performed for you.

Internal control over financial reporting:

- 2) We have communicated to you all deficiencies in the design and implementation or maintenance of internal control over financial reporting of which we are aware.

Fraud & non-compliance with laws and regulations:

- 3) We have disclosed to you:
 - a) the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.
 - b) all information in relation to fraud or suspected fraud that we are aware of that involves:
 - management;
 - employees who have significant roles in internal control over financial reporting; or
 - otherswhere such fraud or suspected fraud could have a material effect on the financial statements.
 - c) all information in relation to allegations of fraud, or suspected fraud, affecting the financial statements, communicated by employees, former employees, analysts, regulators, or others.
 - d) all known instances of non-compliance or suspected non-compliance with laws and regulations, including all aspects of contractual agreements or illegal acts, whose effects should be considered when preparing financial statements.
 - e) all known actual or possible litigation and claims whose effects should be considered when preparing the financial statements.

Subsequent events:

- 4) All events subsequent to the date of the financial statements and for which the relevant financial reporting framework requires adjustment or disclosure in the financial statements have been adjusted or disclosed.

Related parties:

- 5) We have disclosed to you the identity of the Entity's related parties.
- 6) We have disclosed to you all the related party relationships and transactions/balances of which we are aware.
- 7) All related party relationships and transactions/balances have been appropriately accounted for and disclosed in accordance with the relevant financial reporting framework.

Estimates:

- 8) The methods, the data and the significant assumptions used in making accounting estimates, and their related disclosures are appropriate to achieve recognition, measurement or disclosure that is reasonable in the context of the applicable financial reporting framework.

Going concern:

- 9) We have provided you with all information relevant to the use of the going concern assumption in the financial statements.
- 10) We confirm that we are not aware of material uncertainties related to events or conditions that may cast significant doubt upon the Entity's ability to continue as a going concern.

Comparative information:

- 11) We have no knowledge of any significant matters that may have arisen that would require a restatement of the comparative figures/financial information.

Non-SEC registrants or non-reporting issuers:

- 12) We confirm that the Entity is not a Canadian reporting issuer (as defined under any applicable Canadian securities act) and is not a United States Securities and Exchange Commission ("SEC") Issuer (as defined by the Sarbanes-Oxley Act of 2002).
- 13) We also confirm that the financial statements of the Entity will not be included in the group financial statements of a Canadian reporting issuer audited by KPMG or an SEC Issuer audited by any member of the KPMG organization.

Approval of financial statements:

- 14) Vallerie Gillis has the recognized authority to take, and has taken, responsibility for the financial statements.

Yours very truly,

Vallerie Gillis, Board Chair

A handwritten signature in black ink, appearing to read "Keith Martin", is written over a horizontal line. The signature is stylized and cursive.

Keith Martin, Executive Director, CAFII

cc: Board of Directors

Attachment I – Definitions

Materiality

Certain representations in this letter are described as being limited to matters that are material.

Information is material if omitting, misstating or obscuring it could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Judgments about materiality are made in light of surrounding circumstances, and are affected by perception of the needs of, or the characteristics of, the users of the financial statements and, the size or nature of a misstatement, or a combination of both while also considering the entity's own circumstances.

Fraud & error

Fraudulent financial reporting involves intentional misstatements including omissions of amounts or disclosures in financial statements to deceive financial statement users.

Misappropriation of assets involves the theft of an entity's assets. It is often accompanied by false or misleading records or documents in order to conceal the fact that the assets are missing or have been pledged without proper authorization.

An error is an unintentional misstatement in financial statements, including the omission of an amount or a disclosure.

Financial Statements of

**CANADIAN ASSOCIATION OF
FINANCIAL INSTITUTIONS IN
INSURANCE**

And Independent Auditor's Report thereon

Year ended December 31, 2024

INDEPENDENT AUDITOR'S REPORT

To the Members of the Canadian Association of Financial Institutions in Insurance

Opinion

We have audited the financial statements of the Canadian Association of Financial Institutions in Insurance (the Entity), which comprise:

- the statement of financial position as at December 31, 2024
- the statement of operations and changes in fund balances for the year then ended
- the statement of cash flows for the year then ended
- and notes to the financial statements, including a summary of significant accounting policies

(Hereinafter referred to as the "financial statements").

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Entity as at December 31, 2024, and its results of operations and its cash flows for the year then ended in accordance with Canadian accounting standards for not-for-profit organizations.

Basis for Opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the ***"Auditor's Responsibilities for the Audit of the Financial Statements"*** section of our auditor's report.

We are independent of the Entity in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Canadian accounting standards for not-for-profit organizations, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Entity's ability to continue as a going concern, disclosing as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Entity or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Entity's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists.

Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit.

We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion.

The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Entity's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Entity's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Entity to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

DRAFT

Chartered Professional Accountants, Licensed Public Accountants

Toronto, Canada

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Statement of Financial Position

December 31, 2024, with comparative information for 2023

	2024	2023
Assets		
Current assets:		
Cash	\$ 427,994	\$ 243,378
Short-term investments	300,000	404,603
Accounts receivable	—	1,594
Other receivables	2,281	709
Prepaid expense	7,232	5,780
	<u>737,507</u>	<u>656,064</u>
Capital assets (note 4)	5,504	7,643
	<u>\$ 743,011</u>	<u>\$ 663,707</u>

Liabilities and Fund Balances

Current liabilities:		
Accounts payable and accrued liabilities	\$ 113,417	\$ 62,590
Fund balances (note 2)	629,594	601,117
	<u>\$ 743,011</u>	<u>\$ 663,707</u>

The accompanying notes are an integral part of the financial statements.

On behalf of the Board:

_____ Director

_____ Director

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Statement of Operations and Changes in Fund Balances

Year ended December 31, 2024, with comparative information for 2023

	2024	2023
	General Fund	General Fund
Revenue:		
Membership dues	\$ 944,476	\$ 953,098
Interest	30,317	23,278
Miscellaneous	270	380
	975,063	976,756
Expenses:		
Association operating	703,883	761,961
Research and education committee	140,904	152,427
Market conduct committee	5,855	36,385
Networking and events committee	57,282	56,062
Media and advocacy strategy committee	38,662	38,079
	946,586	1,044,914
Excess (deficiency) of revenue over expenses	28,477	(68,158)
Fund balances, beginning of year (note 2)	601,117	669,275
Fund balances, end of year	\$ 629,594	\$ 601,117

The accompanying notes are an integral part of the financial statements.

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Statement of Cash Flows

Year ended December 31, 2024, with comparative information for 2023

	2024	2023
	General Fund	General Fund
Cash provided by (used in):		
Operating activities:		
Excess (deficiency) of revenue over expenses	\$ 28,477	\$ (68,158)
Amortization of capital assets	2,576	1,507
Change in non-cash operating working capital	49,397	(19,718)
Cash provided by (used in) operating activities	80,450	(86,369)
Investing activities:		
Purchase of capital assets	(437)	(7,002)
Short-term investments, net	104,603	(404,603)
Cash used in investing activities	104,166	(411,605)
Increase (decrease) in cash	184,616	(497,974)
Cash, beginning of year	243,378	741,352
Cash, end of year	\$ 427,994	\$ 243,378

The accompanying notes are an integral part of the financial statements.

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Notes to Financial Statements

Year ended December 31, 2024

The Canadian Association of Financial Institutions in Insurance ("CAFII") is a not-for-profit association incorporated under the Canada Not-for-profit Corporations Act on August 25, 2014. CAFII was originally incorporated under the Canada Corporations Act on October 29, 1997 and commenced operations on January 1, 1998. CAFII was established to provide an industry-based forum to represent a range of financial institutions in insurance in Canada and to work in partnership with regulators to create an efficient and effective regulatory framework that provides consumer choice in the purchase of insurance products and services. CAFII's members provide life, property and casualty, travel and credit insurance, reinsurance and other products and services through a wide variety of distribution systems. CAFII is exempt from income taxes under paragraph 149(1)(l) of the Income Tax Act (Canada).

1. Significant accounting policies:

(a) General:

The financial statements have been prepared by management in accordance with Canadian accounting standards for not-for-profit organizations in Part III of the Chartered Professional Accountants of Canada Handbook.

(b) Revenue recognition:

CAFII derives its revenue primarily through membership dues. Dues are recognized as revenue in the membership period (January 1, 2024 to December 31, 2024) to which they relate.

(c) Cash and cash equivalents:

Cash and cash equivalents include cash on hand and deposits which are highly liquid with original maturities of less than three months.

(d) Short-term investments:

Short-term investments represent interest-bearing guaranteed investment certificates issued and guaranteed by a Canadian bank, with a duration of 12 months or less.

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Notes to Financial Statements (continued)

Year ended December 31, 2024

1. Significant accounting policies (continued):

(e) Capital assets:

Tangible capital assets are recorded at cost. When a tangible capital asset no longer contributes to CAFII's ability to provide services, its carrying amount is written down to its residual value.

Tangible capital assets consist of computer equipment and are amortized on a straight-line basis over four years.

(f) Financial instruments:

Financial instruments are recorded at fair value on initial recognition. Financial instruments are subsequently recorded at cost or amortized cost, unless management has elected to carry the instruments at fair value. CAFII has not elected to carry any such financial instruments at fair value.

Financial assets are assessed for impairment on an annual basis at the end of the fiscal year if there are indicators of impairment. If there is an indicator of impairment, CAFII determines if there is a significant adverse change in the expected amount or timing of future cash flows from the financial asset. If there is a significant adverse change in the expected cash flows, the carrying value of the financial asset is reduced to the highest of the present value of the expected cash flows, the amount that could be realized from selling the financial asset or the amount CAFII expects to realize by exercising its right to any collateral. If events and circumstances reverse in a future year, an impairment loss will be reversed to the extent of the improvement, not exceeding the initial carrying value.

(g) Use of estimates:

The preparation of the financial statements requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the year. Significant items subject to such estimates and assumptions include the carrying amount of capital assets. Actual results could differ from those estimates.

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Notes to Financial Statements (continued)

Year ended December 31, 2024

2. Fund balances - General Fund:

The General Fund reports unrestricted resources. If resources are to be used for special purpose, these would be reported in the restricted fund.

CAFI's Board of Directors aims to maintain unrestricted net assets (financial reserves) within a range of between 25% of total annual operating expenses and 50% of total annual operating expenses. Management intends to utilize unrestricted net assets on CAFI-mandated projects, as determined by the Board of Directors.

3. Financial instruments:

The carrying amounts of financial assets and liabilities approximate their fair values due to the short-term nature of these financial instruments.

4. Capital assets:

2024	Cost	Accumulated amortization	Net book value
Computer equipment	\$ 10,303	\$ (4,799)	\$ 5,504

2023	Cost	Accumulated amortization	Net book value
Computer equipment	\$ 9,866	\$ (2,223)	\$ 7,643

CANADIAN ASSOCIATION OF FINANCIAL INSTITUTIONS IN INSURANCE

DRAFT Notes to Financial Statements (continued)

Year ended December 31, 2024

5. Financial risks:

(a) Liquidity risk:

Liquidity risk is the risk that CAFII will be unable to fulfill its obligations on a timely basis or at a reasonable cost. CAFII manages its liquidity risk by monitoring its operating requirements. CAFII prepares budget and cash forecasts to ensure it has sufficient funds to fulfill its obligations. There has been no change to the risk exposures from 2023.

(b) Credit risk:

Credit risk refers to the risk that a counterparty may default on its contractual obligations, resulting in a financial loss. CAFII is exposed to credit risk in relation to its cash, short-term investments, accounts receivable and other receivables.

The maximum exposure to credit risk is the carrying value of these financial assets on the statement of financial position.

(c) Interest risk:

Interest rate risk arises from the possibility that changes in interest rates will affect the value of financial instruments or investment income at maturity.

CAFII's exposure to interest rate risk arises from its interest-bearing short-term investments. The weighted-average yield of the CAFII's short-term investments is 3.75% (2023 - 4%). A 10% increase or decrease in investment yields would affect excess (deficiency) of revenue over expenses and Fund balances by \$1,125 (2023 -\$1,618).

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 3(b)

Financial Management – Timelines for Membership Approval of CAFII 2024 Audited Financial Statements

Purpose of this Agenda Item—Update

To provide an update to the Board on the timelines for membership approval of CAFII 2024 Audited Financial Statements.

Background Information

CAFII Senior Operations Manager Lara Doig will update the Board on the timelines for membership approval of CAFII 2024 Audited Financial Statements

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

One (1) attachment.

Critical Path with KPMG for CAFII 2024 Audited Financial Statements		
Task	Owner	Timing/Deadline
Prepare Draft CAFII 2024 Financial Statements	R. Nason, Managing Matters	Early February, 2025
Distribute Critical Path to KPMG and inquire about the audit process and who they are assigning as a Lead	L. Doig, KPMG (N. Nazmul, H. Lopez)	February 6th, 2025
Conduct Audit of Draft CAFII 2024 Financial Statements — If Ricky has financial statements done before this date, provide to KPMG	KPMG	March 3rd 2025
Provide Draft 1 of CAFII 2024 Audited Financial Statements for circulation prior to March 25th, 2025 CAFII EOC Meeting	KPMG (reviewed and facilitated by L. Doig, N. Nazmul, K. Martin, R. Nason	March 10th or 11th 2025
Provide Feedback on Draft 1 of CAFII 2024 Audited Financial Statements	EOC	March 18th, 2025
Provide Draft 2 of CAFII 2024 Audited Financial Statements for circulation prior to April 8th, 2025 CAFII Board Meeting	KPMG (reviewed and facilitated by L. Doig, N. Nazmul K. Martin, R. Nason)	March 28th, 2025
Approve Draft 2 of CAFII 2024 Audited Financial Statements for presentation to membership at 2025 Annual Meeting of Members	CAFII Board	April 8th, 2025
Provide Final of CAFII 2024 Audited Financial Statements for inclusion in CAFII 2025 Annual Meeting of Members (May 22nd) Both English and French	KPMG (facilitated by R. Nason, T. Woodland)	April 23rd, 2025
Circulate CAFII 2025 Annual Meeting of Members Materials Package	T. Woodland	April 24th, 2025
Approve CAFII 2024 Audited Financial Statements at 2025 Annual Meeting of Members	Membership	June 3rd, 2025

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 3(c)
Financial Management – CAFII Financial Statements as at February 28/25

Purpose of this Agenda Item—Update

To provide an update to the Board on CAFII's financial statements as at February 28/25.

Background Information

CAFII Treasurer Donald Hinnecke will update the Board on CAFII's financial statements as at February 28/25.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

One (1) attachment.

CAFI

20 Richmond Street East, Suite 600-25
Toronto, ON M5C 2R9

Statement of Operations As at Feb 28th, 2025

	Current Month	Budget Feb-25	Variance to Monthly Budget	Current YTD	Budget '25 YTD	Variance Budget to YTD	Budget 2025
Revenue							
<i>Member and Associate Dues</i>	\$81,659	\$79,992	\$1,667	\$161,650	\$159,983	\$1,667	\$959,900
<i>Interest Revenue</i>							
Interest Revenue - Saving Account	\$752	\$0	\$752	\$1,383	\$0	\$1,383	\$0
Interest-Savings, Short-term CD	\$639	\$0	\$639	\$1,586	\$0	\$1,586	\$0
Total Interest Revenue	\$1,391	\$1,250	\$141	\$2,969	\$2,500	\$469	\$15,000
<i>Miscellaneous (One time event fees)</i>	\$0	\$0	\$0	\$0	\$0	\$0	\$0
TOTAL REVENUE	\$83,050	\$81,242	\$1,808	\$164,619	\$162,483	\$2,136	\$974,900
Expenses							
<i>Association operating</i>							
CAFI Staff Salaries and Benefits	\$42,110	\$39,208	(\$2,901)	\$82,750	\$78,417	(\$4,333)	\$470,500
Managing Matters Contractual Fees	\$12,219	\$12,250	\$31	\$24,437	\$24,500	\$63	\$147,000
Recruitment fees	\$0	#N/A	#N/A	\$0	\$0	\$0	#REF!
Legal Counsel and Consultant Support							
Associated with Regulatory Submissions	\$0		\$2,500	\$0		\$5,000	
and Related Communications/Advocacy							
Initiatives		\$2,500			\$5,000		\$30,000
Audit Fees	\$1,300	\$1,300	\$0	\$2,600	\$2,600	\$0	\$15,600
Insurance	\$733	\$767	\$34	\$1,465	\$1,533	\$68	\$9,200
Website SEO and Enhancements	\$0	\$1,827	\$1,827	\$0	\$3,654	\$3,654	\$46,700
Member Communication and Technology Tools	\$705	\$1,217	\$512	\$1,831	\$2,433	\$602	\$14,600
Telephone/Fax/Internet	\$719	\$575	(\$144)	\$776	\$1,150	\$374	\$6,900
Postage/Courier	\$44	\$17	(\$27)	\$44	\$33	(\$11)	\$200
Office Expenses	\$653	\$267	(\$386)	\$834	\$533	(\$300)	\$3,200
Bank Charges	\$25	\$108	\$83	\$50	\$217	\$167	\$1,300
Depreciation Computer/Office Equipment	\$215	\$217	\$2	\$429	\$433	\$4	\$2,600
Managing Matters Webinar Fees	\$0	\$0	\$0	\$2,113	\$2,117	\$4	\$12,700
Speaker fees & travel	\$0	\$0	\$0	\$0	\$0	\$0	\$2,500
New Office Equipment	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Professional Development/Continuing Education	\$0	\$0	\$0	\$0	\$0	\$0	\$10,000
Miscellaneous Expense	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Association operating Expenses	\$58,721	\$60,252	\$1,530	\$117,330	\$122,620	\$5,291	\$773,000
<i>Research and education committee</i>							
Research/Studies	\$0	\$0	\$0	\$0	\$0	\$0	\$68,900
CAFI Benchmarking Study/RSM Canada	\$0	\$17,000	\$17,000	\$0	\$17,000	\$17,000	\$68,000
Total Research and education committee Expenses	\$0	\$17,000	\$17,000	\$0	\$17,000	\$17,000	\$136,900
<i>Market conduct committee</i>							
Provincial Regulatory Visits and Relationship-Building	\$0	\$0	\$0	\$0	\$0	\$0	\$28,000
Federal Regulatory Visits and Relationship-Building	\$0	\$0	\$0	\$0	\$0	\$0	\$2,500
Total Market conduct committee	\$0	\$0	\$0	\$0	\$0	\$0	\$30,500
<i>Networking and events committee</i>							
Annual Members and Associates Luncheon	\$0	\$2,500	\$2,500	\$0	\$2,500	\$2,500	\$21,500
Board Hosting (External)	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Board/EOC Meeting Expenses	\$0	\$1,455	\$1,455	\$0	\$1,455	\$1,455	\$16,000
Industry Conferences and Events	\$0	\$1,267	\$1,267	\$0	\$2,533	\$2,533	\$15,200
EOC Annual Appreciation Dinner	\$0	\$0	\$0	\$0	\$0	\$0	\$6,500
Gifts	\$0	\$167	\$167	\$0	\$333	\$333	\$2,000
CAFI Staff/Board Relationship-Building	\$0	\$167	\$167	\$0	\$333	\$333	\$2,000
Networking Events	\$0	\$167	\$167	\$0	\$333	\$333	\$2,000
CAFI 25th Anniversary Celebration	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Networking and events committee	\$0	\$5,721	\$5,721	\$0	\$7,488	\$7,488	\$65,200
<i>Media and advocacy strategy committee</i>							
Media Outreach	\$1,262	\$542	(\$720)	\$2,076	\$1,083	(\$992)	\$6,500
Media Consultant Retainer	\$2,543	\$2,542	(\$1)	\$5,085	\$5,083	(\$2)	\$30,500
Marketing Collateral	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Media and advocacy strategy committee	\$3,804	\$3,083	(\$721)	\$7,161	\$6,167	(\$994)	\$37,000
TOTAL EXPENSE	\$62,526	\$86,056	\$23,531	\$124,490	\$153,275	\$28,785	\$1,042,600
NET INCOME	\$20,524	(\$4,815)	25,338	\$40,129	\$9,208	\$30,920	(\$67,700)
proof	-	-	-	-	0	-	-

Explanatory Notes:

- 1 - Amortization of office equipment based on 4 year straight line depreciation
- 2 - Management fees includes Managing Matters and Executive Director
- 3 - Website includes hosting cafi.com, subscription and website improvements.

CAFII

20 Richmond Street East, Suite 600-25
Toronto, ON M5C 2R9

Balance Sheet As at Feb 28th, 2025

	CAFII Operations		
	28-Feb 2025	31-Jan 2025	31-Dec 2024
ASSETS			
Current Assets			
Bank Balance	\$233,316	\$80,271	\$102,910
Savings Account	\$470,437	\$255,716	\$325,085
TD Investment in GIC- 1104 8045480 01	\$303,113	\$303,113	\$300,000
PLCLCAD Plooto Clearing	\$0	\$0	\$0
TD Canada Trust ****054	\$0	\$0	\$0
Undeposited Funds	\$0	\$0	\$0
Accounts Receivable	\$525,793	\$959,898	\$0
Interest Receivable	\$754	\$114	\$2,281
Prepaid Expenses	\$10,445	\$6,733	\$7,232
Computer/Office Equipment	\$10,303	\$10,303	\$10,303
Accumulated Depreciation -Comp/Equip	(\$5,228)	(\$5,014)	(\$4,799)
Total Current Assets	\$1,548,932	\$1,611,135	\$743,011
TOTAL ASSETS	\$1,548,932	\$1,611,135	\$743,011
	-	-	
LIABILITIES			
Current Liabilities			
Accrued Liabilities	\$60,009	\$73,175	\$88,843
Credit Card	\$538	\$541	\$540
Account Payable	\$10,415	\$8,314	\$24,033
Deferred Revenue	\$808,248	\$879,907	\$0
Suspense	\$0	\$0	\$0
Total Current liabilities	\$879,210	\$961,936	\$113,417
TOTAL LIABILITIES	\$879,210	\$961,936	\$113,417
	-	-	
UNRESTRICTED NET ASSETS			
Unrestricted Net Assets, beginning of year	\$629,594	\$629,594	\$601,117
Excess of revenue over expenses	\$40,129	\$19,605	\$28,477
Total Unrestricted Net Assets	\$669,722	\$649,199	\$629,594
Total Unrestricted Net Assets	\$669,722	\$649,199	\$629,594
TOTAL LIABILITIES AND UNRESTRICTED NET ASSETS	\$1,548,932	\$1,611,135	\$743,011
	-	-	
Financial Reserves Targets as per 2024 Budget:			
Minimum 3 months (25%) of Annual Operating Expenses=		\$	260,650
Maximum 6 months (50%) of Annual Operating Expenses=		\$	521,300
Current Level of Financial Reserves (total unrestricted net assets):			\$669,722

C A F I I

20 Richmond Street East, Suite 600
Toronto, ON M5C 2R9

Membership Fees

		<u>Jan-25</u>				
		<u>Billed</u>	<u>Received</u>	<u>Invoice sent</u>	<u>Method of Payment</u>	<u>Received Date</u>
TD Insurance	2025 Upper Tier Member	\$ 77,110		03-Feb-25		
BMO Bank of Montreal	2025 Upper Tier Member	\$ 77,110	\$ 77,110	03-Feb-25	Direct Payment - EFT	13-Mar-25
CIBC Insurance	2025 Upper Tier Member	\$ 77,110		03-Feb-25		
RBC Insurance	2025 Upper Tier Member	\$ 77,110	\$ 77,110	03-Feb-25	Direct Payment - EFT	25-Feb-25
Scotia Insurance	2025 Upper Tier Member	\$ 77,110	\$ 77,110	03-Feb-25	Direct Payment - EFT	05-Feb-25
Desjardins Financial Security Life Assura	2025 Upper Tier Member	\$ 77,110		03-Feb-25		
National Bank Insurance	2025 Upper Tier Member	\$ 77,110	\$ 77,110	03-Feb-25	Direct Payment - EFT	07-Feb-25
Manulife Financial	2025 Upper Tier Member	\$ 77,110	\$ 77,110	03-Feb-25	Direct Payment - EFT	06-Feb-25
The Canada Life Assurance Company	2025 Upper Tier Member	\$ 77,110		03-Feb-25		
Securian Canada	2025 Lower Tier Member	\$ 38,555	\$ 38,555	03-Feb-25	Cheque Deposit - 21-March	21-Mar-25
Assurant	2025 Lower Tier Member	\$ 38,555	\$ 38,555	03-Feb-25	Direct Payment - EFT	05-Feb-25
CUMIS Group Ltd	2025 Lower Tier Member	\$ 38,555	\$ 38,555	03-Feb-25	Cheque Deposit - 21-Feb	20-Feb-25
Canadian Tire Bank	2025 Lower Tier Member	\$ 38,555	\$ 38,555	03-Feb-25	Direct Payment - EFT	27-Feb-25
Chubb Life Insurance Company of Canada	2025 Lower Tier Member	\$ 38,555		03-Feb-25		
RSM Canada	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Cheque Deposit - 21-March	21-Mar-25
Willis Towers Watson	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Direct Payment - EFT	07-Mar-25
KPMG LLP	Associate	\$ 5,000		03-Feb-25		
Optima Communications	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Direct Payment - EFT	12-Feb-25
RGA Life Reinsurance Company of Canada	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Direct Payment - EFT	26-Feb-25
Torlys LLP	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Direct Payment - EFT	07-Feb-25
Stikeman Elliott	Associate	\$ 5,000		03-Feb-25		
Royal & Sun Alliance Insurance Company	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Cheque Deposit -6-Mar	06-Mar-25
PWC	Associate	\$ 5,000		03-Feb-25		
Fasken	Associate	\$ 5,000	\$ 5,000	03-Feb-25	Direct Payment - EFT	07-Feb-25
Canadian Western Bank(Hold until given new name)	2025 Initiation Members (Lower Tier)	\$ 23,133		hold		
Total of Renewing Members		\$959,898	\$574,770			
New Members						
Jennings Consulting	Associate	\$ 5,000	\$ 5,000	25-Feb-25	Direct Payment - EFT	21-Mar-25
Global Excel Management	Associate	\$ 5,000		25-Feb-25		
Total of New Members		\$10,000	\$5,000			
Total Membership Fees		\$969,898	\$579,770			
Total amount to realocate monthly Jan-Dec. 2025		\$80,824.83				

Briefing Note

CAFII BOD Meeting April 08, 2028—Agenda Item 3(d)

Financial Management – Receipt of 2024 CAFII Member Dues Payments and Associate Dues Payments

Purpose of this Agenda Item—Update

To provide an update to the Board on the receipt of 2024 CAFII Member Dues Payments and Associate Dues Payments.

Background Information

CAFII Senior Operations Manager Lara Doig will update the Board on the receipt of 2024 CAFII Member Dues Payments and Associate Dues Payments.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 08, 2028—Agenda Item 3(e) Financial Management – Operating Budget 2026: Option for Dues Increases

Purpose of this Agenda Item—Update/Discussion

To update and discuss with the Board CAFII's 2026 Operating Budget and the option for a dues increase.

Background Information

CAFII Executive Director Keith Martin will update the Board on CAFII's 2026 Operating Budget and the option for a dues increase. Afterward, he will open the floor for discussion and input. While a recommendation will be made, it is not expected that the Board will make a decision at this meeting.

The expenses associated with fulfilling the Board-approved strategic plan are higher than current revenues, leading to structural deficits. CAFII has analyzed different scenarios going out to 2028 and will be recommended a 5% dues increase in each of 2026, 2027, and 2028. The EOC was presented with the different scenarios and was supportive of this approach.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

Two (2) attachments.

Options for CAFII Dues Increase 2026

Observation: CWB revenue of \$23K will be lost in 2026
Observation: 2026 projected member revenue based on current financials: \$937K
Observation: 2025 projected investment income: \$15000
Observation: 2025 projected expenses (total): \$1042600
Observation: 2025 projected financial reserves at the end of the year: \$554000

Note: A spreadsheet with all the detailed calculations for the analysis below will be circulated to members separately

Member Dues Increase

Revenue

This analysis will look at the impact of dues increases to members and Associates of 0%, 5%, 10%, and 15%.

Let's start with the revenue side—for now, \$15K investment is not included in the calculations.

Revenue

Dues Increase	Original 2026 Member Revenue	Revenue Increase from Member Dues Increase	New Total Revenue with \$15000 investment income added back in
0%	\$937000	\$0	\$952000
5%	\$937000	\$46850	\$998850
10%	\$937000	\$93700	\$1045700
15%	\$937000	\$140550	\$1092550

Expenses

Now let's look at expenses.

The analysis needs to assume the increase in costs for 2026. For purposes of this exercise, we will assume a 3% increase in costs. That is \$31K in additional 2026 costs.

This means that in 2026 projected expenses will be \$1073600.

Surplus/Deficit

Now let's look at the impact of different member dues increases on our financial position. The revenue line includes the projected \$15K investment revenue.

Dues Increase	Revenue with Investment Income	Expenses with 3% Increase	End of Year Surplus/Deficit
0%	\$952000	\$1073600	(121600)
5%	\$998850	\$1073600	(74750)
10%	\$1045700	\$1073600	(27900)
15%	\$1092550	\$1073600	18950

Financial Reserves and Operating Ratio

Now let's look at the impact of revenue increases on end-of-year financial reserves and operating ratios. The operating ratio is calculated by taking our end of year reserves and dividing it into our expenses. CAFII strives to be in a ratio range of 25-50%. Our operating budget projects a 2025 deficit of \$67.7K, reducing our 2024 end of year reserves of \$621.5K to \$554K. The \$554K is the starting number for the calculations below. So for example, if we have a 0% increase in dues, our deficit will be \$121.6K; end of year 2024 reserves of \$554K will be reduced by \$121.6K, leaving an end of year 2025 reserves of \$432.3K.

Dues Increase	End of Year Reserves	Operating Ratio
0%	\$432400	40%
5%	\$479250	45%
10%	\$526100	49%
15%	\$572950	53%

Assumptions

Option 1--Baseline

2026 0% revenue increase

2027 0% revenue increase

2028 0% revenue increase

Expenses increase by 3% each year

End of year reserves 2025 \$554,000

<u>Year</u>	<u>Revenue</u>	<u>Expense</u>	<u>Surplus/Deficit</u>	<u>End of Year Cash</u>	<u>End of Year Operating Ratio</u>
2026	\$962000	\$1073600	(\$116600)	\$442400	41%
2027	\$962000	\$1105808	(\$143808)	\$295600	27%
2028	\$962000	\$1139000	(\$176000)	\$118800	11%

Option 2

2026 0% revenue increase

2027 5% revenue increase

2028 5% revenue increase

Expenses increase by 3% each year

End of year reserves 2025 \$554,000

<u>Year</u>	<u>Revenue</u>	<u>Expense</u>	<u>Surplus/Deficit</u>	<u>End of Year Cash</u>	<u>End of Year Operating Ratio</u>
2026	\$962000	\$1073600	(\$116600)	\$442400	41%
2027	\$1010100	\$1105800	(\$95700)	\$346700	31%
2028	\$1060600	\$1139000	(\$78400)	\$268500	25%

Option 3

2026 5% revenue increase

2027 5% revenue increase

2028 5% revenue increase

Expenses increase by 3% each year

End of year reserves 2025 \$554,000

<u>Year</u>	<u>Revenue</u>	<u>Expense</u>	<u>Surplus/Deficit</u>	<u>End of Year Cash</u>	<u>End of Year Operating Ratio</u>
2026	\$1010100	\$1073600	(\$63500)	\$490500	45%
2027	\$1060600	\$1105800	(\$45200)	\$445300	40%
2028	\$1113600	\$1139000	(\$25400)	\$420000	37%

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(a)

Strategic and Regulatory Matters – Plans for a Segmentation Research Study with Pollara in 2025

Purpose of this Agenda Item—Update

To update the Board on CAFII's plans for a segmentation research study with Pollara in 2025.

Background Information

CAFII's Research Analyst, Robyn Jennings, will update the Board on CAFII's plans to conduct a segmentation research study with Pollara in 2025. At the February EOC meeting, Lesli Martin (Pollara) presented the research study plan. Afterward, CAFII received EOC approval for the proposal. L. Martin is currently drafting the survey questions, which she will share with R. Jennings and CAFII's Executive Director Keith Martin for input. R. Jennings and K. Martin will do an initial review of the questions and then circulate them to the Research & Media (R&M) Committee for further input. R. Jennings will also set up a meeting with the R&M Committee to discuss the proposed questions. Once the questions have been finalized, they will be sent back to L. Martin with the go-ahead for public distribution.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

One (1) attachment.

Understanding Canadians in terms of Insurance Needs and Usage

Proposal for



June 2024

One of Canada's longest-standing full-service research firms, focussed on providing strategic, actionable, and realistic advice to our clients



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Corporate Profile

2

- **Since 1985**, one of Canada's premier public opinion and market research firms
- Teams in Toronto, Ottawa, Montreal, Saskatoon, Calgary, and Vancouver, with **global, multi-national capabilities**
- Comprehensive toolbox of quantitative and qualitative **methodologies and analytical** techniques, and constantly innovating with **new cutting-edge approaches** to design, sampling, and analysis
- **Customized, creative research solutions** – no cookie cutters
- Design-through-deliverables engagement from **team** of widely-recognized and respected **senior research veterans** who are passionate about developing **long-term advisory partnerships**, helping clients make better decisions
- Deep expertise, extensive experience in **public opinion/public affairs research**, including work for many insurance companies, financial institutions and associations, such as CAFII, IFIC, Bank of Montreal, Bank of Canada, TD Bank, Allstate Insurance, Aviva and Pembridge.

A senior team with deep expertise and extensive experience conducting public opinion/public affairs research for insurance companies, financial institutions and associations



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Senior Team Members

3

Lesli Martin, Senior Vice President: A research industry veteran of more than 20 years, Lesli leads many of Pollara's major client accounts as well as many of our research model and product initiatives. Over the years, Lesli has earned a reputation for client service excellence that is second to none – in no small part driven by her experience as a manager of research departments at several storied Canadian brands. Lesli has worked with a number of financial institutions and associations such as CAFII, IFIC, Bank of Canada, Bank of Montreal and FSRA. Lesli is a Certified Analytics & Insights Professional (CAIP). Prior to joining Pollara, she was a senior researcher and account lead at Leger and comScore, and led research departments at Sears, Cossette, and Great Gulf Homes. She has published numerous research-based articles, and her research has been reported in most Canadian media outlets. Lesli holds a BA in Business Communication from Brock University.

Reem Hassan, Associate Vice President:

Based in Saskatchewan, Reem is an empathetic and analytical researcher who applies an extensive degree of expertise and global perspective to all of her research projects. For the past decade, she had enjoyed investigating and applying groundbreaking new research methods to projects. She provided research-based strategic advice on product launches, advertising campaigns, and countless re-branding initiatives. Her clients appreciate her keen interest in deeply understanding the dimensions of their business situation in order to provide them with a tailored solution, comprehensive analysis, and succinct recommendations. Reem has completed the Market Research Society (MRS UK) Advanced Certificate in Market Research and holds a Bachelor's degree with double majors in Marketing and Strategic Management from the German University in Cairo.

The Pollara team has collectively conducted public affairs/public opinion research for hundreds of clients, including multiple projects with insurance companies, financial institutions and associations.

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Relevant Experience

- The Pollara team has collectively conducted public affairs/public opinion research studies and programs for hundreds of clients – including hundreds of issues management and communications studies (often of a sensitive nature), hundreds of federal and provincial government studies, and numerous transit/transportation studies. Some particularly relevant studies include:
 - **CAFII** – CPI Research 2018, 2021, 2022, Travel Health Insurance Study 2016, 2018
 - **IFIC** – Mutual Fund and ETF Investor Study 2006 -2024
 - **Pembridge** – Broker Study 2008-2023
 - **BMO Bank of Montreal and BMO Harris** – Multiple projects 2010 - 2024
 - **Insurpoll** – Syndicated Study of Home and Auto Insurance
 - **Insurance Bureau of Canada (IBC)** – Multiple projects 2010-2024

Research Plan

WHAT WE KNOW:

What insurance means to Canadians

- **Canadians tend to be uninsured or underinsured** – this is particularly true of low-income Canadians when it comes to life insurance.
 - *BUT – the incidence of having CPI is similar regardless of income level*
- While many **believe insurance is important** and feel their family would have trouble covering living expenses without their salary, they don't have it and overall, do not feel financially knowledgeable.
 - *The majority with life insurance feel they have enough and do not need more, but actually are considered underinsured, with less than 7 years salary in coverage*
- CPI could be a great solution for the uninsured or underinsured homeowner.

WHAT WE KNOW:

Credit Protection Insurance

- Canadians see **CPI as a valuable and effective means of protection**
 - It is a quality, trustworthy product;
 - Most who made a claim had it paid and were satisfied with the process
- **Important factors of CPI:** amount of coverage, person to answer questions, ability to qualify
- However, **almost half of homeowners with credit do not have CPI**
 - Unsure of its affordability or value for money
 - Do not recall being told about it
 - Do not think it is necessary, despite being underinsured

WHAT WE NEED TO KNOW

- **Gaps in our knowledge:**

- Canadians think Life Insurance is important, but do not have it
- While they feel positively about CPI, they have chosen not to get it
- Income plays a role, but even high incomes tend to be underinsured

- **We need to understand why:**

- who obtains the correct amount of insurance and who does not,
- what could influence the purchase of insurance (life or CPI) among those who are not or are underinsured,
- where can these people be reached

Segmentation analysis will allow us to identify specific and distinct groups within the Canadian population and determine how insurance can meet their needs



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HOW WE WILL DO IT

9

Segmentation Study:

A technique used to divide a broad target market into smaller, more homogeneous groups based on various criteria such as demographics, psychographics, behaviour, or needs.

What the Survey will Include



Demographics

Awareness

- Age
- Gender
- Income/Investible assets
- Home ownership
- Household composition
- Level of debt
- Education
- Employment Status



Financial Attitudes and Perceptions

Relevancy

- Perceived economic status (getting ahead, just getting by, falling behind)
- Household income vs. cost of living
- Primary financial concerns
- Financial literacy
- Use of financial tools and supports



Behavioural Analysis of Insurance

- Use of insurance, including type and amount
- Purchase behaviours
- Perceptions of levels of insurance needed
- Perceived importance of insurance



Concept Test

- Provide overall definition of CPI to determine awareness and interest
- Provide specific benefits of CPI to determine appeal and level of influence
- Test cost impacts if possible



Information Sources

- Understand where Canadians go for financial advice/information
- Determine levels of trust for specific sources



Trust

METHODOLOGY

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Online Survey of 3,500 Adult Canadians

- 12-14-minute survey
- Gen Pop sample, with quotas in place to ensure national representation
- **In segmentation research, a sample of this size will allow for:**
 - Statistical Significance
 - Segmentation Heterogeneity
 - Sub-group Analysis
 - Ability to project results to Canadian population
 - Analysis of key populations – homeowners, CPI holders/non-holders, etc.



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WHAT IT WILL GIVE US

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1. **A detailed description of homogenous segments of the Canadians population, based on our key factors**
2. **An actionable understanding of each group's behaviours, perceptions and influences when it comes to insurance,**
 - Concerns each has about financial stability/future
 - How they feel about insurance and the role it could play
 - What will influence each segment to consider insurance
 - How and where to communicate with each segment



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Budget

All design-through-deliverables costs

Online Survey of 3500 Canadians:

- 12-14-minute survey
- Segmentation and regression analysis
- Report and Presentation

Total Cost: \$48,000 plus HST = \$54,240

Timelines & Deliverables

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Timelines per wave

- Survey design, revision, approval: Approx. 2-3 weeks
- Scripting, fielding: Approx. 3-4 weeks
- Data processing: Approx. 2 week
- Analysis and reporting: Approx. 3 weeks

Analysis / Deliverables

- Advanced statistical analysis (Segmentation Analysis and Regression Analysis)
- PowerPoint-based report with graphical representation of results and executive summary of findings, including recommendations re: key messages and target segments



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Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(b)

Strategic and Regulatory Matters – Update on the Implementation of the Media Strategy

Purpose of this Agenda Item—Update

To update the Board on the implementation of the media strategy.

Background Information

CAFII's Media Consultant, Wendy Bairos, will update the Board on the implementation of CAFII's media strategy.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

Two (2) attachments.

FOR IMMEDIATE RELEASE

AI and Digital Innovation are Reshaping Credit Protection Insurance, New CAFII-Deloitte Research Reveals

More than 70% of insurers cite legacy systems as the biggest hurdle to modernizing digital experiences and AI-driven underwriting

TORONTO, [Date] – New research from the Canadian Association of Financial Institutions in Insurance (CAFII) and Deloitte reveals that artificial intelligence (AI), advanced analytics, and digital-first experiences are poised to transform the Credit Protection Insurance (CPI) industry in Canada. The study, *Exploring Emerging Technology & Gen AI Trends in CPI* [[LINK](#)], outlines how insurers are modernizing underwriting, streamlining claims, and meeting rising consumer expectations for digital engagement—while also facing key barriers to adoption.

“This research underscores the urgent need for the insurance industry to modernize and harness new technologies that deliver faster, more accessible, and more tailored protection for Canadian consumers,” said Keith Martin, Executive Director of CAFII. “While AI and automation are improving efficiencies, legacy systems and regulatory complexities remain hurdles. The time is now for strategic investments that put consumer experience and digital accessibility at the forefront.”

Key Findings: A Snapshot of the Future of CPI in Canada

- **AI-Powered Underwriting is Closing Protection Gaps**
AI-driven models are reducing approval times, improving risk assessment, and making insurance more inclusive. More than 60% of insurers say AI will have a high impact on underwriting and claims processing over the next 3-5 years. Manulife has already deployed AI-powered underwriting tools that cut processing time while leveraging decades of underwriting data.
- **Consumers Demand Digital-First, Self-Service Insurance**
With more than half of CPI insurers prioritizing investments in digital customer engagement, the industry is shifting toward mobile-first experiences, real-time policy access, and digital education tools. 33% of insurers cite enhancing customer experience

as a top priority for tech investment, showing a shift toward more consumer-friendly insurance solutions.

- **Cloud-Based Technology is Driving Agility and Security**

Insurers are embracing cloud computing to enhance security compliance, improve operational efficiencies, and integrate AI-driven insights at scale. 70% of insurers identify cloud-based platforms as a key enabler of future-ready CPI services.

- **Regulatory Barriers & Legacy Systems Are Slowing Adoption**

Despite these advancements, outdated infrastructure and fragmented regulatory policies are delaying modernization efforts across the industry. CPI remains heavily reliant on the broader lending ecosystem, creating complexities in technology adoption. Over 70% of insurers cite legacy technology as the biggest challenge in delivering digital-first solutions.

The Path Forward: Building a Future-Ready Insurance Industry

CAFII's research calls for greater collaboration between insurers, fintechs, and regulators to accelerate innovation, investment in AI, and adoption of cloud-based platforms.

By embracing ecosystem partnerships and modernizing digital engagement, Canada's CPI industry has a unique opportunity to lead in financial protection innovation—ensuring Canadians have more seamless, secure, and customized insurance solutions in an evolving financial landscape.

To access the full report, visit [CAFII website link]

####

About CAFII

The [Canadian Association of Financial Institutions in Insurance](#) is a not-for-profit industry association dedicated to the development of an open and flexible insurance marketplace. CAFII believes that consumers are best served when they have meaningful choice in the purchase of insurance products and services. CAFII's 15 members include the insurance arms of Canada's major financial institutions—BMO Insurance, CIBC Insurance, Desjardins Insurance, National Bank Insurance, RBC Insurance, Scotia Insurance, Canadian Western Bank and TD Insurance, along with major industry players Assurant Canada, The Canada Life Assurance Company, Canadian Tire Bank, Chubb Life Insurance Company of Canada, CUMIS Services Incorporated, Manulife (The Manufacturers Life Insurance Company), and Securian Canada.

For more information or to request an interview, please contact:

Wendy Bairos
Media Consultant

DRAFT

DRAFT: Infographic Outline: The Impact of Emerging Tech on Credit Protection Insurance (CPI)

Title: AI, Cloud, and Digital Innovation: The Future of Credit Protection Insurance in Canada

1. Introduction

- **Brief Context:** The CPI industry is evolving rapidly with emerging technologies like AI, cloud computing, and digital platforms.
 - **Key Insight:** AI-driven underwriting, digital-first experiences, and cloud-based modernization are transforming the Credit Protection Insurance industry—closing protection gaps and enhancing accessibility for Canadian consumers.
-

2. External Forces Driving Change in CPI

(Visual: Icons representing each driver)

- **Increased Data & AI Capabilities:** 60% of insurers say AI will have a high impact on underwriting and claims processing in the next 3-5 years.
 - **Evolving Customer Expectations:** 33% of insurers cite enhancing customer experience as a top priority for tech investment.
 - **Legacy Systems as a Barrier** → *70% of insurers say outdated infrastructure is the biggest challenge to digital transformation*
-

3. Key Emerging Technologies Reshaping CPI

(Visual: A circular or segmented infographic displaying each technology)

- **AI-Powered Underwriting:** Speed, risk assessment, and closing protection gaps.
- **Cloud Computing:** 70% of insurers cite it as key to security and agility.
- **Digital Engagement & Self-Service:** 50% of insurers are prioritizing mobile-first strategies.
- **Advanced Analytics:** Enhancing personalization and fraud detection.
- **Process Automation:** Streamlining claims and policy approvals.

4. AI-Driven Transformation in CPI

(Visual: Flowchart or timeline demonstrating process improvement)

- **Before AI:** Lengthy manual application processing, rigid underwriting.
- **After AI:** Faster approvals, better risk assessment, reduced protection gap.
- **Example:** Manulife has deployed an AI-powered underwriting tool that reduces application processing time by leveraging decades of analytics. More than 60% of insurers believe AI-driven underwriting will significantly reduce risk assessment gaps and make insurance more inclusive.

5. Strategic Investment Areas in CPI

(Visual: Bar chart or percentage breakdown)

- AI-Powered Underwriting & Risk Assessment → 60% of insurers expect major impact
- Cloud-Based Digital Transformation → 70% of insurers say cloud will drive efficiency & security
- Self-Service & Digital Customer Experience → 50% of insurers are prioritizing mobile-first experiences
- Ecosystem Partnerships & Fintech Collaborations → The #1 strategy for modernizing CPI

6. Challenges & Risks

(Visual: Risk matrix or icons)

- **Legacy Technology (Biggest Roadblock):** 70% of insurers say legacy systems are slowing adoption
- **Regulatory Hurdles:** Compliance concerns delaying AI integration
- **Cybersecurity & Data Privacy:** New cloud and AI models increase data risks
- **Digital Readiness Gap:** Only a fraction of insurers track key digital metrics

7. The Future of CPI with Emerging Tech

(Visual: Timeline or projection graph)

- **2025-2026:** AI-driven risk assessment & underwriting widely adopted.

- **2027-2028:** Real-time personalized insurance products using AI & analytics.
 - **Beyond 2030:** Seamless, AI-powered insurance ecosystem with real-time claims & digital-first customer experiences.
-

8. Trademark Acknowledgment

(Visual: Small footer text)

- *Manulife, Stylized M Design, and Manulife & Stylized M Design are trademarks of The Manufacturers Life Insurance Company and are used by it, and by its affiliates under license.*

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(c)

Strategic and Regulatory Matters – Update on the Meetings with the FCAC and the Department of Finance on March 17th, 2025, Ottawa

Purpose of this Agenda Item—Update

To update the Board on CAFII's meetings with the FCAC and the Department of Finance on March 17th, 2025, in Ottawa.

Background Information

CAFII Executive Director Keith Martin will update the Board on CAFII's meetings with the FCAC and the federal Department of Finance in Ottawa on March 17, 2025.

On March 17, 2025, the CAFII team, including volunteers, met at 9:15 a.m., prior to the meetings, to prepare for the day. In addition to the CAFII team, the following individuals were in attendance on behalf of the Association:

- Karyn Kasperski, RBC – *EOC Chair*
- John Burns, Securian Canada – *EOC Vice-Chair*
- Rob Dobbins, Assurant Canada
- Andrea Stuska, TD Canada
- Michelle Costello, CUMIS/Co-Operators

In attendance from the FCAC were:

- Shereen Miller – *Commissioner of the FCAC*
- Frank LoFranco – *Deputy Commissioner of the FCAC*
- Anne Gorman – *Chief of Staff at the FCAC*
- Eric Dagenais – *Title not clear; formerly Senior Executive at Innovation, Science, and Economic Development Canada (ISED)*
- David Weir - *Policy Subject Matter Expert*
- Stephanie Duhaime - *Director, Program and Policy Innovation*

The meeting with the FCAC was successful. Shereen Miller was engaged and asked many questions. She expressed the importance of meetings like this, particularly due to the insurance industry's ever-changing nature. As the meeting continued, S. Miller expressed the FCAC's alignment with harmonization; while she did not explicitly use the word "harmonized," that was her point. At the end of the presentation, K. Martin discussed having a webinar with the FCAC in the Spring, to which S. Miller replied that they would be interested.

The meeting with the Federal Department of Finance began at 2:00 p.m. In attendance, both in person and virtually, from the Federal Department of Finance were:

- Mark Radley – *Director, Consumer Affairs(in-person)*
- Judith Hamel – *Director General, Finance Services Division, Finance Sector Policy Branch*
- Anne Loosen – *Senior Project Leader and Economist (in-person)*
- Michael Chan – *Senior Advisor*
- Nathalie Chevassu – *Economist*

Unlike the meeting with the FCAC, there were very few questions during K. Martin's presentation. Once he concluded, K. Martin opened the floor for comments and questions. Mark Radley commented that consumer-driven banking is a big priority for the financial sector's team and that they are currently working on the next steps. M. Radley explained to CAFII that, while it is a transitional time at the Department, there is still a large focus on FTC and the improvement of consumer experiences.

The federal Department's members were curious about CPI – how it functions, its limitations, and its benefit within the financial ecosystem.

At the end of the meeting, Anne Loosen asked if CAFII could share its presentation with her.

Recommendation / Direction Sought–Update

This is a discussion item.

Attachments Included with this Agenda Item

Three (3) attachments.

Credit Protection Insurance

Offered by CAFII Members

Making insurance simple and accessible for Canadians
Rendre l'assurance simple et accessible pour les Canadiens



Credit Protection Insurance Overview

Credit Protection Insurance (CPI)

Optional group insurance for specific debts, including:



Mortgages



Line of credit
(secured/unsecured)



Credit cards



Loans

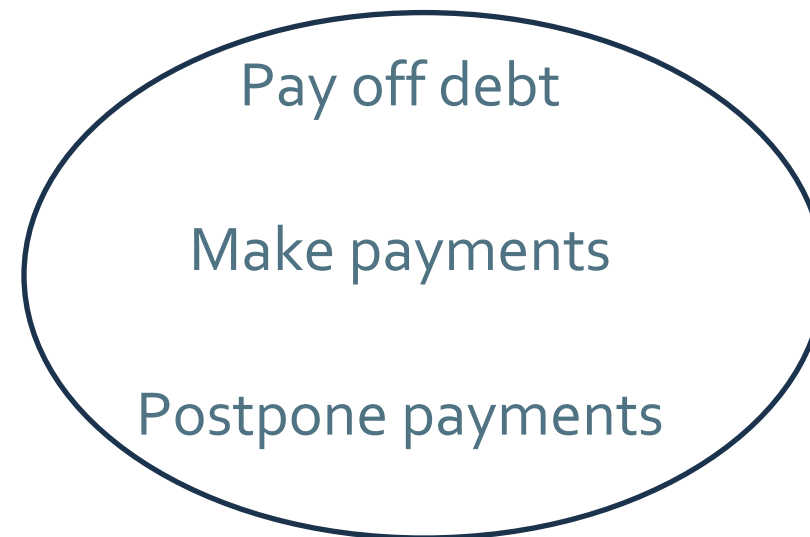
Credit Protection Insurance (CPI)

Protects consumers' debt obligations against a variety of risks

In the case of:



CPI can help to either:



Simple, accessible and affordable

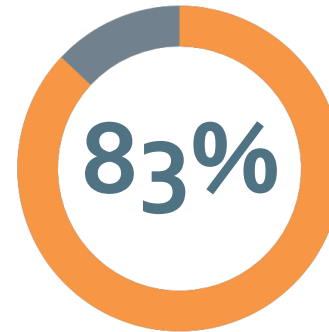


87%

87% of Canadians with CPI on their mortgages and Home Equity Lines of Credit (HELOCs) say it is a convenient way to protect themselves and/or their families.*



69% of Canadians with CPI say CPI is an affordable insurance option*



83% of Canadians with CPI coverage say it is an effective way to protect themselves and their families.*

*Source: CAFII commissioned national online survey of 1,003 adult Canadians who have Credit Protection Insurance on a mortgage and/or home equity line of credit. The survey was conducted in October 2022 by Pollara Strategic Insights.

Coast-to-coast-coast access

Financial institutions



Insurers





Sobering statistics

Inadequate coverage

38% of Canadian homeowners are “at risk” due to being underinsured or uninsured



These are Canadian homeowners who have credit, have dependents, and are underinsured or uninsured*

.....
*Source: LIMRA “Insurance Among Canadian Homeowners” Study for CAFII, February 2024.

Rising debt levels

At the same time, Canadians are more indebted than ever

As of January 2025, **50%** of Canadians feel they're within **\$200** of not being able to cover their monthly bills and debt obligations¹

In 2024, the average consumer non-mortgage debt was over **\$25,500**²

In 2023, the average Canadian consumer had over **\$110,000** in debt, including mortgage³

In 2023, the median mortgage debt was **\$205,000**⁴

In 2023, an average of **337** Canadians filed for insolvency **per day**⁵

As of 2023, Canadians have over **\$122bn** in outstanding credit card balances⁶

Sources:

¹ Global News <https://globalnews.ca/news/Canadian-mnp-debt-index-new-low-2025>

² TransUnion Report <https://www.transunion.ca/Quarterly-Overview-of-Consumer-Credit-Trends-2024>

³ Statistics Canada <https://www150.statcan.gc.ca/n1/Survey-of-Financial-Security,2023>

⁴ Statistics Canada <https://www150.statcan.gc.ca/assets-and-debts-held-by-economic-family-type,by-age-group,Canada,provinces-and-selected-census-metropolitan-areas,Survey-of-Financial-Security>

⁵ Canadian Association of Insolvency and Restructuring Professionals <https://www.CAIRP:2023Annual&Q4CanadianInsolvencyStatistics.com>

⁶ Equifax <https://www.Equifax.ca/about-Equifax/press-release/-/Economic-Pressures-Could-Impact-Credit-Performance-of-Consumers,Especially-Young-Adults>

Unforeseen life events happen

Critical illness, disability or job loss a reality many Canadians will face

In 2024, an estimated **675,000** Canadians were diagnosed with Cancer¹

As of December 2024, the Canadian unemployment rate was **6.7%**, with concerns among economists it could increase due to recessionary pressures⁶

In November 2024, the number of unemployed Canadians increased by **87,000**³

As of 2023, strokes remain the **leading cause of adult disability** in Canada⁴

As of 2022, the annual stroke rate was approx. **108,707** or **1** stroke every **5** minutes²

Sources:

¹Canadian Cancer Society <https://cancer.ca/en/research/cancer-statistics/cancer-statistics-at-a-glance>

²Statista <http://www.statista.com/statistics/unemployment-rate-in-canada-from-2019-2029>

³Statistics Canada <https://www150.statcan.gc.ca/n1/Labour-Force-Survey/November-2024>

⁴Provincial Health Service Authority <http://www.phsa.ca/about/news-stories/stories/world-stroke-day-2023>

⁵Heart & Stroke Foundation <https://www.heartandstroke.ca/what-we-do/media-centre/news-releases/stroke-in-canada-is-on-the-rise>



Closing the gap

Having the “what if?” conversation

If it isn’t offered, most people won’t seek it out



As of 2023, only **8%** of Canadians have Critical Illness Insurance*

Having the insurance conversation opens a difficult but critical dialogue to help people understand their risks – and what’s available to them

*Sources: Advisor Talks, *Critical Illness Insurance – Do We Position Its True Value or Baulk at the Cost?* (October 2023).
Canadian Life & Health Insurance Association, *Got questions about critical illness insurance? CLHIA’s latest consumer guide has answers to help you* (February 2024).

Meet Marie

37 years old,
married

2 kids, one in
daycare, one
in school

Primary
income
earner



~\$300,000
remaining on a
\$500,000
mortgage

20-year
amortization

Owens life
insurance through
her employer's
group benefits plan

Debts have a way of piling up

Takes out \$50,000
HELOC for home
renovations

Takes out an
unsecured loan for
private school



Puts new furnace
on credit card

What if something happens?

Cannot afford
daycare, affecting
employability

Misses
credit card
payments

Family's lifestyle
dramatically
altered

Loses family
home



No coverage for
job loss, disability
or critical illness

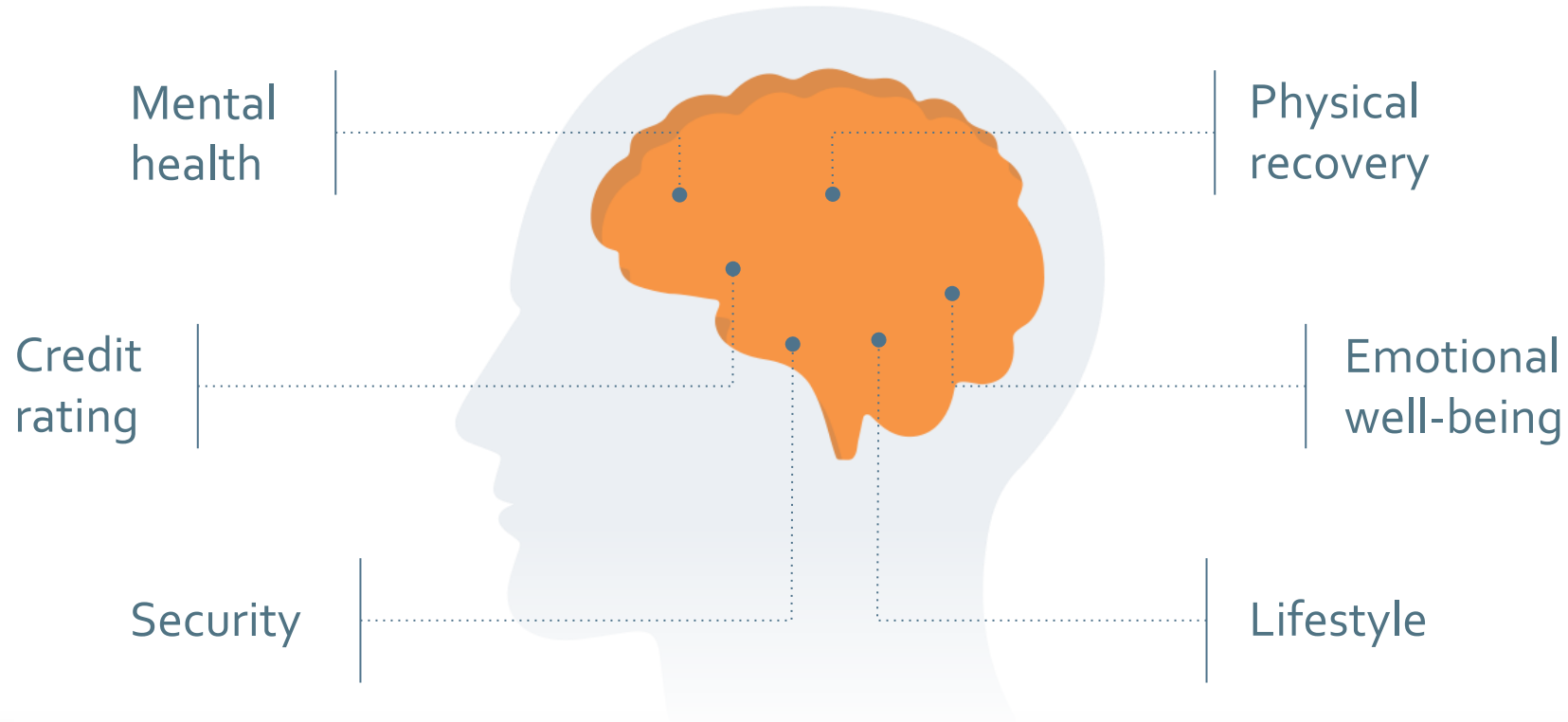
Credit rating
plummets

Experiences
depression

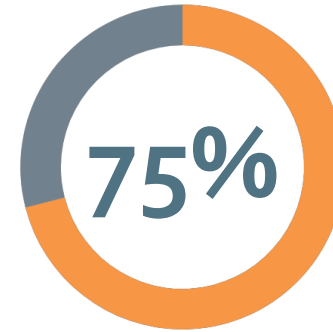
Group benefits life
insurance insufficient to
cover mortgage

What if she had the conversation?

Opening a dialogue at the point of sale



Marie's not alone



75% said that without CPI, they do not know how they and/or their family would be able to cope, should an unexpected life occurrence negatively impact them financially.

*Source: CAFII commissioned national online survey of 1,001 adult Canadians who have Credit Protection Insurance on a mortgage and/or home equity line of credit. The survey was released in November 2022 by Pollara Strategic Insights.



Sales practices built on fair
treatment of customers

Coverage is optional

Multiple accountabilities and product features reinforce optional nature of coverage

Bank client service representatives are **trained to communicate that CPI is optional**, in keeping with CBA Code of Conduct for Authorized Insurance Activities

Coverage can be **cancelled at any time**

Customers have an initial **period of 10 to 30 days**, within which they may cancel coverage and receive a full premium refund

Tied selling is strictly prohibited in legislation for banks



Accurate information

Comprehensive and recurring training to ensure consumers receive accurate and reliable information

Staff adheres to carefully developed scripts and protocols during the customer conversation to:

- ✓ Ensure that customers are provided full disclosure prior to purchasing
- ✓ Ensure that the financial institution obtains express consent (verbal or written) from the customer

CAFII member FIs educate those offering CPI through:

- ✓ Individual coaching
- ✓ Formal CPI training programs
- ✓ Team huddles

Prioritizing consumer protection

Oversight doesn't end once the consumer has enrolled in CPI coverage

Post sale practices are designed to ensure the fair treatment of customers:

- ✓ Calls are routinely recorded and monitored
- ✓ Post-sale reviews ensure customers understood and gave express consent
- ✓ Complaints are monitored for any emerging trends
- ✓ CPI insurers monitor spikes of cancellations



Consumer-friendly documentation

Post Sale Disclosure reinforces informed purchase decisions

Certificates of insurance

- ✓ Eligibility conditions
- ✓ Features and benefits
- ✓ Limitations
- ✓ Exclusions
- ✓ Statement that the coverage is optional and voluntary

Transparency

- ✓ Cost outlined in “plain language”
- ✓ Optionality reinforced

Clear & simple processes for making a claim

- ✓ How to submit a claim
- ✓ Insurer’s name and contact information
- ✓ Premium charges
- ✓ Review period within which coverage may be cancelled for a full premium refund

Straightforward complaint handling

Significant back-end work to ensure fair front-end sales practices

Robust internal complaint handling process

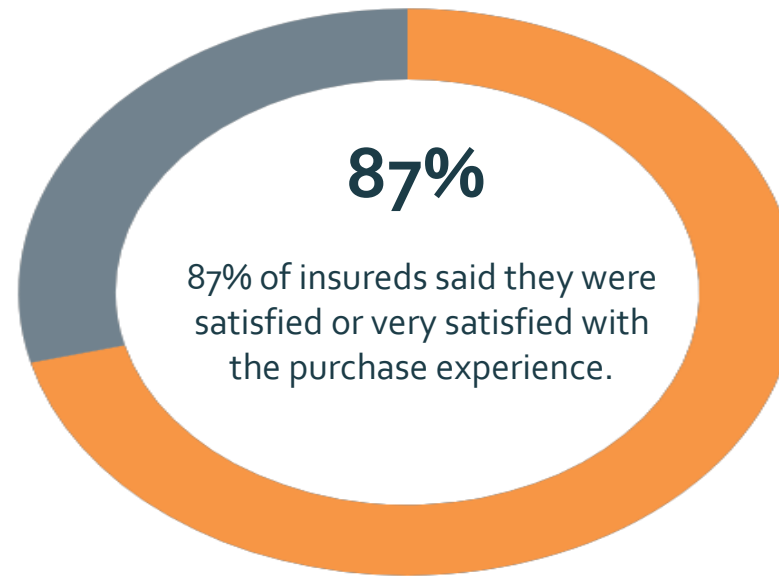
- ✓ Complaints are handled with an emphasis on the **fair treatment of customers**
- ✓ CPI insurers track and report complaints to the new national database rooted in the **CCIR Annual Statement on Market Conduct**

We take Complaint Handling seriously and our members ~~adhere~~ to FCAC's Financial Consumer Protection Framework

Consumer satisfaction a priority

Making sure consumers understand their coverage

At the time of signing up
for their CPI coverage:



*Source: CAFII commissioned national online survey of 1,001 adult Canadians who have Credit Protection Insurance on a mortgage and/or home equity line of credit. The survey was conducted in October 2022 by Pollara Strategic Insights.



Strict industry self-regulation and
robust provincial/federal regulation

Industry self-regulation

Mandatory participation in and compliance with industry guidelines and codes of conduct



CAFII Insurance company members that are members of the CLHIA are **required to adhere to CLHIA Industry Guidelines** for CPI product design and distribution, in particular, *G7 Creditor's Group Insurance* and *G9, Direct Marketing**.

CBA Code of Conduct for Authorized Insurance Activities outlines obligations and best practice standards expected of bank representatives who offer Authorized Insurance Products

- CLHIA is a voluntary trade association that represents the collective interests of its member life and health insurers, which account for 99 per cent of the life and health insurance business in Canada. Source: [CLHIA - Membership Information](#)

CAFII's Regulators and Authorities we Deal With...



Robust provincial regulation network

Established conduit for communication among member jurisdictions



Provincially regulated

Fair treatment of customers integral to provincial regulators



CCIR / CISRO Fair Treatment
of Customers Guidance a top priority



CAFII Members are Committed to the Fair Treatment of Customers



GUIDANCE: CONDUCT OF INSURANCE BUSINESS AND FAIR TREATMENT OF CUSTOMERS

CAFII shares regulators' objective of ensuring consumers are well-protected while also having the ability to purchase products through their channel of choice.

In an insurance industry context, it's important to note that part of the overall objective of FTC is to ensure insurers can provide support and meet consumers' expectations throughout the user experience.

Federal oversight

Robust legislative/regulatory framework, monitoring & oversight to ensure fair treatment and protection of consumers

Financial Consumer Agency of Canada (FCAC)

Monitors and enforces compliance with federal consumer protection measures

Federal legislation and regulations

The Bank Act and the related Insurance Business (Banks and Bank Holding Companies) Regulations control key market conduct issues such as tied selling and privacy





Looking forward

CAFII Posts Research Results, Summaries of In-Person Speeches, and Webinars on www.cafii.com

We Post our Research Findings at www.cafii.com



Exploring Emerging Technology Trends in CPI
February 2025 | Executive Presentation



Summaries of In-Person Events are Posted at www.cafii.com



Justeena Zaki-Azat, Senior Research Analyst of Applied Research Solutions, LIMRA and LOMA, on "Insurance Among Canadian Homeowners" March 19, 2024



Dominic Hains, President and Chief Executive, RGA Life Reinsurance Company of Canada, at CAFII's Annual Members' and Associates' Luncheon, May 28, 2024

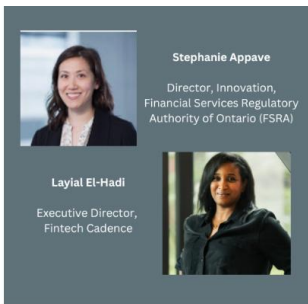


Keegan Iles, PwC, speaks at CAFII's December 3, 2023 Reception

Webinars are Recorded and Posted at www.cafii.com



October 17, 2024
Summary of CAFII's Webinar: A Conversation on Open Banking



January 30, 2025
Summary of CAFII's Webinar: Insurance Innovation in Ontario



September 11, 2024
CAFII Fireside Chat with Jennifer Sutherland Green, Jennifer Crummy, Lauren Keefe-Hogan, and Rahul Deshmukh



April 25, 2024
CAFII Webinar Mental Health Issues in the Workplace: A CAFII Virtual Fireside Chat with Jeff Scott, Jennifer Heaslip, and Paula Allen

Questions

Keeping the conversation and dialogue going

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Briefing Note

CAFII Regulatory Meeting March 17, 2025

Introductory and Informational — *Information about the Attending Members, Organizational Insights, and Summaries of CAFII's Previous Interactions with Both Organizations*

Purpose of this Item – Summarize

To introduce the attending members from the FCAC and the Federal Department of Finance, as well as to outline each organization's recent regulatory activities and CAFII's connections to both, including regulatory submissions.

Background Information

On March 17, 2025, CAFII will meet with representatives from the Financial Consumer Agency of Canada (FCAC) and the Federal Department of Finance respectively.

In attendance from CAFII:

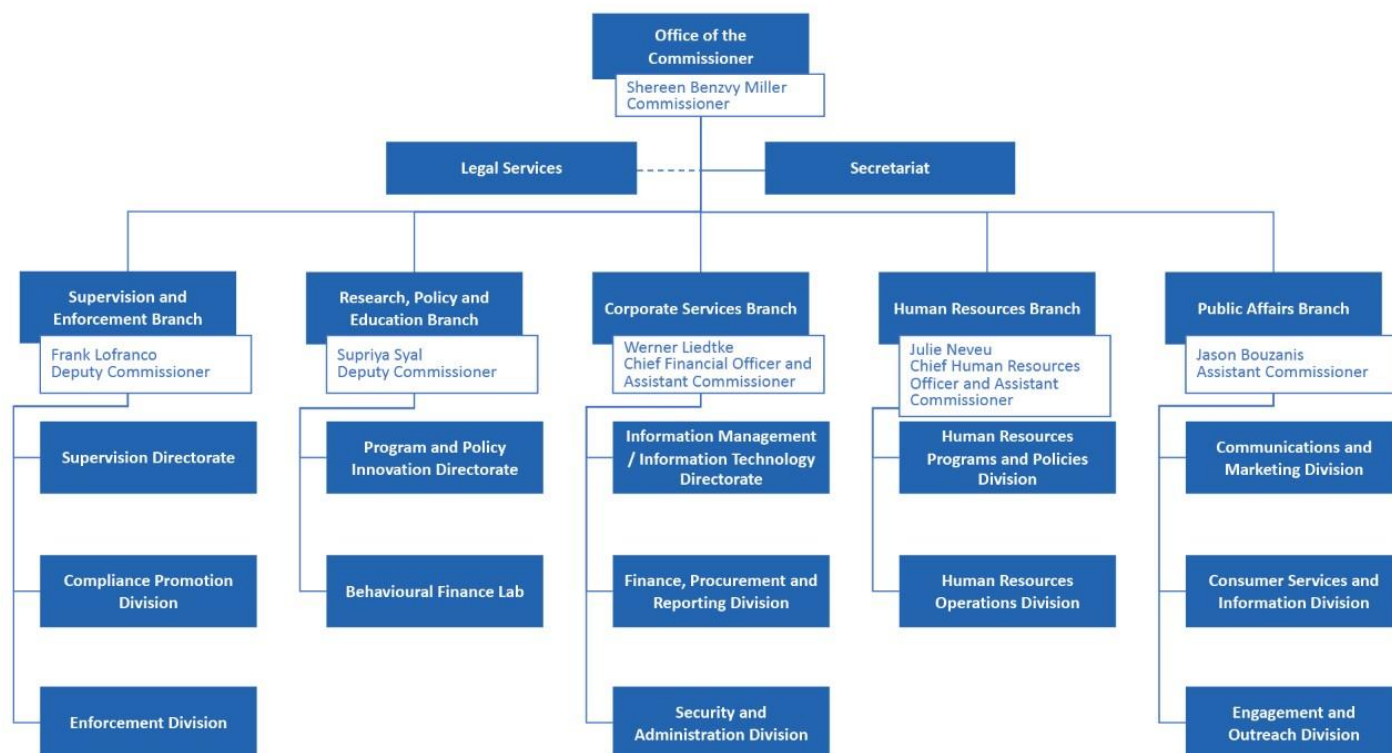
- Karyn Kasperski, EOC Chair
- John Burns, EOC Vice Chair
- Rob Dobbins, past EOC Chair
- Andrea Stuska, Chair, Research & Media Committee
- Michelle Costello, former Vice Chair, Research & Education Committee
- Keith Martin, CAFII Executive Director
- Robyn Jennings, CAFII Research Analyst
-

Schedule for March 17, 2025

1. **Preparatory Meeting:** Go to **Bridgehead at 9:15 a.m. (344 Slater St.)**. The entrance is on the other side of the building where the FCAC is located. You can access Bridgehead by walking across the mall from the entrance on Laurier Avenue.
2. **FCAC Meeting:** FCAC offices are located at **427 Laurier Ave W, 5th Floor, Ottawa**. We plan to meet in the lobby at 9:50 a.m., take the elevator to the 5th floor, and ring the doorbell. **The meeting is from 10 to 11.30 a.m.**
3. **Lunch Following FCAC Meeting:** CAFII will host a lunch following the FCAC meeting at Brown's Socialhouse, 160 Elgin Street, #1 (613.695.3030). Reservation is under "Keith Martin."
 - a. This is a 14-minute walk from the FCAC building, so depending on the weather, we may take cabs.
4. **Meeting with the Department of Finance:** After lunch, we will walk four minutes to the Department of Finance building, located at **90 Elgin Street, 13th floor**. We will assemble in the lobby, and someone will come fetch us to get us through security. **The meeting is from 2 to 3.30 p.m.**

- a. Mark Radley, Director of Consumer Affairs, will attend the meeting, but the members of his delegation have not been confirmed.

FCAC Organizational Structure and Attendees – Bios and Personal Information



Reporting to the Commissioner

- Deputy Commissioner, Supervision and Enforcement Branch (Frank Lofranco)
 - Director General, Supervision Directorate (Rana Abu Naameh)
 - Compliance Promotion Division
 - Enforcement Division
- Deputy Commissioner, Research, Policy and Education Branch (Supriya Syal)
 - Research, Policy and Education Branch
 - Director General, Program and Policy Innovation Directorate (Kyle Burns)
 - Behavioural Finance Lab
- Chief Financial Officer and Assistant Commissioner, Corporate Services Branch (Werner Liedtke)
 - Chief Information Officer, Information Management / Information Technology Directorate (Pirth Singh)
 - Finance, Procurement and Reporting Division

- Security and Administration Division
- Chief Human Resources Officer and Assistant Commissioner, Human Resources Branch (Julie Neveu)
 - Human Resources Programs and Policies Division
 - Human Resources Operations Division
- Assistant Commissioner, Public Affairs Branch (Jason Bouzanis)
 - Communications and Marketing Division
 - Consumer Services and Information Division
 - Engagement and Outreach Division

Shereen Miller, FCAC Commissioner



Ms. Shereen Benzvy Miller is a human rights lawyer by training, with more than 20 years of experience in various executive roles with the Government of Canada. Prior to her appointment as Commissioner of the Financial Consumer Agency of Canada, she served as Senior Assistant Deputy Minister of Service Innovation at Shared Services Canada.

From 2019 to 2023, she was Senior Assistant Deputy Minister of Next Generation Human Resources and Pay at Shared Services Canada. From 2017 to 2019, Ms. Benzvy Miller was Immigration and Refugee Board of Canada's Deputy Chair of Refugee Protection. From 2013 to 2017, she was Innovation, Science and Economic Development Canada's Assistant Deputy Minister of Small Business, Tourism and Market Place Services. She led the creation of the Build in Canada Innovation Program and the Innovative Solutions Canada Program. In addition, Ms. Benzvy Miller led the creation and launch of the Canadian Innovation Centre for Mental Health in the Workplace. Her leadership experience includes process and organizational change, digital transformation, executive team management, and strategic partnership building.

Read more about Sherren Benzvy Miller [here](#).

Frank Lofranco, Deputy Commissioner, Supervision and Enforcement Branch



Before joining FCAC, Frank Lofranco was the Deputy Superintendent, Operations and Corporate Services, at the Office of the Superintendent of Bankruptcy, and prior to that he was Vice President of Scotiabank's Global Anti-Money Laundering Operations. Mr. Lofranco also has held executive positions at the Treasury Board Secretariat, Human Resource and Skills Development Canada, FedDev Ontario, and the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC). During his 10 years with FINTRAC, he served in multiple roles including Deputy Chief Compliance Officer.

Mr. Lofranco holds a Master of Public Administration (MPA) from the University of Guelph, and a Bachelor of Public Policy and Administration (PPA) from York University.

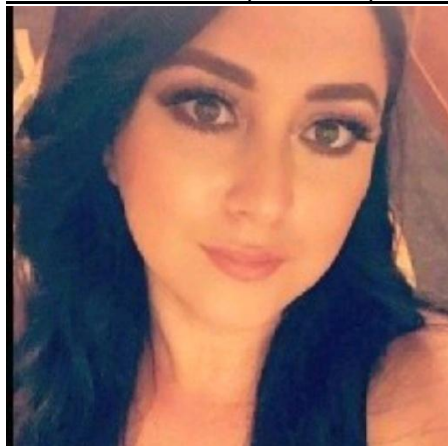
Supriya Syal, Deputy Commissioner, Research, Policy and Education Branch



Dr. Supriya Syal is the former Chief Science Advisor to the Treasury Board Secretariat Talent Cloud, and the former Chief Behavioural Scientist of the Privy Council Office Innovation Hub. Prior to joining the

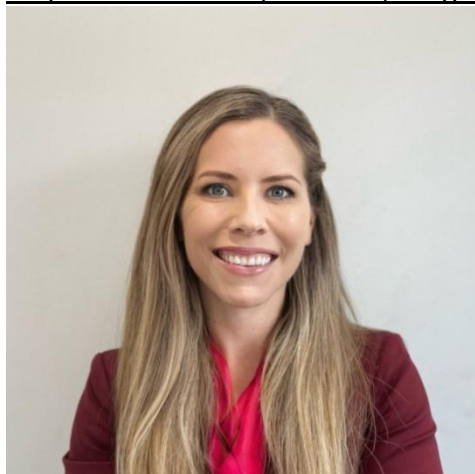
public sector, Dr. Syal was VP Research and Innovation at BEworks Inc. She is also the founder and former President of Dulcimer Labs, a purpose-driven company that creates social impact through evidence-based decision making. Dr. Syal holds a PhD in psychology from Cornell University, as well as a master's degree in neuroscience and a bachelor's degree in biochemistry.

Rana Abu Naameh, Director, General of Supervision



Rana Abu Naameh has worked for the FCAC since 2021. She was promoted to Director General of Supervision in April 2024. Before working at the FAC, Ms. Naameh worked at Innovation, Science and Economic Development Canada in various roles, including Regional Director. She has worked in government since 2009. Ms. Naameh has a B.A. from Dalhousie University in International Development and Spanish (double major). She then went on to receive an MBA from HEC Montreal. She speaks Arabic, English, and Spanish.

Stephanie Duhaime, Director, Program and Policy Innovation



Stephanie Duhaime has worked for the FCAC since August 2022 as the Director of Program and Policy Innovation. Before this, she spent two years as Director of Policy, Planning, and

Coordination at the Federal Economic Development Agency of Northern Ontario. Ms. Duhaime has worked in government since 2005, including Global Affairs Canada.

Ms. Duhaime has a Bachelor of Science in Biochemical Engineering and a Bachelor of Arts in Economics from Western University. She speaks English, French, and Arabic.

Marilyn Leblanc, Director, Secretariat and Office of the Commissioner



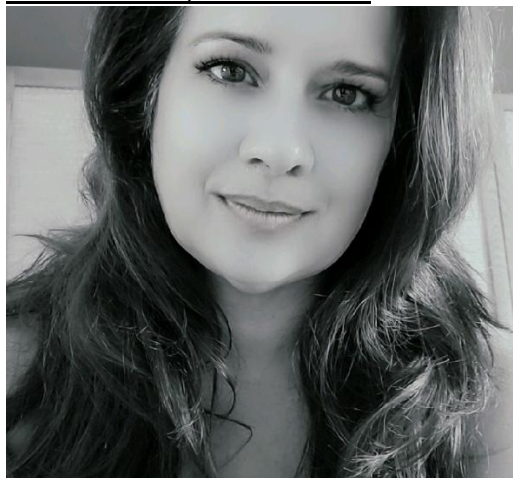
Marilyn Leblanc has worked for the FCAC since 2016, where she was originally hired as a Senior Advisor to the Commissioner. In 2023, she was promoted to Director, Secretariat and Office of the Commissioner. She has an LL.B in Civil and International Law from the Université Laval, and spent two years working as an articling student for Fasken Martineau DuMoulin. Ms. Leblanc worked for Justice Canada as Counsel from 2007 to 2009. Ms. Leblanc speaks English and French.

Eric Dagenais, FCAC title not clear, formerly Senior Assistant Deputy Minister, Innovation, Science and Economic Development Canada



Eric Dagenais has worked at Innovation, Science and Economic Development Canada for over 14 years. For five years, he held the position of Senior Assistant Deputy Minister, Spectrum and Telecommunications Sector. Currently, his LinkedIn states his title as Senior Executive, however, this is unclear. Mr. Dagenais has a BCom in Finance and Public Administration and a BA in Business/Commerce from the University of Ottawa and an MA in Economics from Carleton University. He speaks both English and French.

Anne Gorman, Chief of Staff



Anne Gorman has been the FCAC's Chief of Staff since November 2024. Before this, she was the Chief of Staff to ADM at Shared Services Canada.

There was very little information available on Ms. Gorman.

The Federal Department of Finance Attendees – Bios and Personal Information

Below are the expected attending members from the Federal Department of Finance; the list has not been confirmed by the Department, but all individuals were invited to the meeting.

Judith Hamel, Director General of Financial Services Division



Judith Hamel has worked at Finance Canada for over four years, with two of those years as the Director General of Financial Services Division. Before this, she worked at the Association des économistes québécois, Environment and Climate Change Canada, Environment Canada, and the Privy Council Office. She has a bachelor's degree in Economics and Political Science and an MA in Economics from the Université de Montréal. Ms. Hamel speaks both English and French.

Mark Radley, Director of Consumer Affairs



Mark Radley has worked for the Federal Department of Finance (Finance Canada) since January 2023 as the Director of Consumer Affairs, Financial Sector Policy. Before this, he worked at the Privy Council Office as a Senior Policy Officer. He spent, in total, nearly eight years working at Environment and Climate Change Canada. Mr. Radley has a BA in Economics and an MA in Economics from Simon Fraser University. He can speak both English and French.

Anne Loosen, Economist



Anne Loosen has worked as an economist for the Department of Finance Canada since 2010. Prior to this, she worked at McGill University as a teaching assistant (2009-2010) and at Indigenous and Northern Affairs Canada as a Junior Analyst (2007-2008). She has a B.Sc. in Mathematics from Dalhousie University and an MA in Economics from McGill University.

Ms. Loosen speaks English and French.

Michael Chan, Senior Advisor

There was no information available online on Nathalie Chevassu. She does not seem to have a LinkedIn account.

[Here](#) is a link to Mr. Chan's Government of Canada Personal Information page.

Nathalie Chevassu, Economist

There was no information available online on Nathalie Chevassu. She does not seem to have a LinkedIn account.

[Here](#) is a link to Ms. Chevassu's Government Employee Directory page.

Recommendation / Direction Sought – Summarize

No action required.

Attachments Included with this Agenda Item

13 attachments.

The following items have been linked:

- [January 6, 2022 - CAFII FCAC Appropriateness Guideline Submission](#)
- [December 11, 2021 - CAFII Response to FCAC Consultation on Complaints Procedures FINAL](#)

Submissions, Responses, and Regulatory Documents

The Financial Consumer Agency of Canada

January 30, 2025—The FCAC Published an Article Covering a Conversation with Its New Commissioner on Industry in 2025.

On January 30, 2025, the Financial Consumer Agency of Canada (FCAC) published an article covering an introductory conversation with Shereen Miller, its new Commissioner. The article has been summarized below.

At the beginning of January 2025, the FCAC announced S. Miller as the regulator's new Commissioner. With over 20 years of experience in various executive roles within the Government of Canada, S. Miller is a human rights lawyer by training. Prior to her appointment, she served as Senior Assistant Deputy Minister of Service Innovation at Shared Services Canada.

Over the course of her career, S. Miller has been dedicated to serving vulnerable communities. For this reason, she found FCAC's mandate of consumer protection and financial education particularly compelling. She emphasizes the importance of user-centric design in financial services, advocating for consumer protection as an essential aspect of building trust in the financial system.

Reflecting on her previous roles, S. Miller highlights three key positions that have shaped her approach:

1. *Human Rights Advocate for Federally Sentenced Offenders at Correctional Service Canada:* This role underscored the importance of listening to the communities served and understanding the challenges within their environments.
2. *Deputy Chair of the Immigration and Refugee Board of Canada:* Leading the largest administrative tribunal in Canada, she gained insights into maintaining independence in decision-making while engaging with Parliament and central agencies.
3. *Leadership in the Next Generation HR-to-Pay Initiative:* Addressing significant trust deficits due to technological failures, she learned to balance human and technological elements, dissecting complex problems into manageable components.

As Commissioner, S. Miller is committed to ensuring that financial service providers prioritize consumers, especially the vulnerable, to enhance trust and effectiveness in Canada's financial systems.

Read the FCAC's full article [here](#).

November 25, 2024—The FCAC Published Commissioner Shereen Miller's Opening Statement to the Standing Committee on Industry and Technology (INDU).

On November 25, 2024, the FCAC published Commissioner Shereen Miller's opening statement to the Standing Committee on industry and technology (INDU). The speech has been included below.

Thank you, Mr. Chair, for the introduction, and to the Committee for inviting us to appear before you today.

My name is Shereen Benzvy Miller. I am delighted to have been recently appointed as the Commissioner of the Financial Consumer Agency of Canada, or FCAC. I have been Commissioner for 12 days, and I am honoured to lead an Agency with such an important mandate. I joined during Financial Literacy Month, which takes place every November, and is now wrapping up.

The focus of this year's campaign is to encourage Canadians to talk about money and take steps to build their financial knowledge and confidence. FCAC's research shows that money conversations can lead to better financial outcomes. FCAC welcomes this opportunity to contribute to the Committee's study of Canada's e-Transfer ecosystem, and the broader electronic payments industry.

Joining me today are 3 members of my executive committee. We have Dr. Supriya Syal, Deputy Commissioner of Research, Policy and Education. We also have Frank Lofranco, Deputy Commissioner of Supervision and Enforcement. And finally, we have Jason Bouzanis, Assistant Commissioner of Public Affairs.

Each of these three functions works together to advance the Agency's mandate, and support and protect Canadians. It is my hope that their knowledge and insights will aid the Committee and inform our meeting today.

In my opening statement, I will begin by outlining FCAC's mandate. Then I will turn to FCAC's role as it relates to the payment ecosystem. I will also explain the regulatory requirements related to electronic payments that FCAC oversees. Finally, I will address interchange fees and e-Transfers before concluding.

FCAC mandate

FCAC is an independent federal agency that protects the rights and interests of consumers of financial products and services. This includes the rights of merchants who process payment cards. The Agency's mandate includes many important elements. First, as a strong and effective regulator, we supervise the compliance of federally regulated financial entities with consumer protection measures set out in legislation, public commitments, and codes of conduct.

That short summary of the regulatory side of our mandate carries great significance.

Compliance with market conduct obligations leads to consumer protection and, ultimately, more positive financial outcomes for Canadians. Protected consumers leads to trust and consumer confidence in financial institutions. Consumer confidence contributes to the safety and soundness of the financial system.

The financial literacy side of our mandate is equally important. Through FCAC's National Financial Literacy Strategy, we work with stakeholders from across the country to build the

financial resilience of Canadians. FCAC also conducts research and evidence-based analysis on trends and issues that impact financial consumers. This is particularly important as an avenue through which we inform and support the Department of Finance's role in developing financial sector policy and legislation. As we look forward, FCAC's mandate is expanding to include responsibility for overseeing, administering, and enforcing Canada's Consumer-Driven Banking Framework. As a leader and innovator in financial consumer protection, FCAC is well-placed to take on this responsibility.

FCAC's mandate as it relates to the payment ecosystem

Given that the Committee is furthering its study with a more specific area of focus, I will concentrate my remarks on FCAC's mandate as it relates to the payment ecosystem. As discussed at our previous appearance before this committee, FCAC oversees the market conduct obligations of payment card networks operators—also known as PCNOs—under the Code of Conduct for the Payment Card Industry. Examples of payment card network operators in Canada include VISA Canada, Mastercard Canada, American Express, Discover, Union Pay, and Interac for its debit card product. Payment card network operators must incorporate the Code—in its entirety—into their contracts, business practices, and governing rules. Payment card network operators are responsible for ensuring that the payment processing companies using their network comply with the obligations under the Code. That means that payment processing companies must understand and work proactively to meet the market conduct obligations in the Code.

Revised Code of Conduct for the Payment Card Industry

Recently, the Government announced a revised Code of Conduct for the Payment Card Industry. Most elements came into effect on October 30th, and the remaining – more technical – elements will follow on April 30th, 2025. Merchants in Canada who process payment cards now benefit from protections designed to ensure transparency, flexibility and choice. Disclosure and complaint handling are critical components of protection, whether that be for consumers in retail banking or merchants. And enhanced disclosure and improved complaint-handling are key elements of the new Code. For example, merchants will receive more information on card processing fees at the time of quote, when they sign their agreement with their service provider, and in their monthly statement. Importantly, merchants also now have access to a complaint handling process that is clear, simple, transparent, and that requires that their complaint be handled in a timely manner. In addition, merchants have a longer period to cancel agreements and may do so if certain fee reductions are not passed on in full. FCAC expects payment card network operators to implement the revised Code, and it is our role to supervise their compliance with their market conduct obligations. While FCAC does not comment publicly on its ongoing supervisory activities, the Agency's conclusions on the compliance of federally regulated financial entities are described in our Annual Report. I should also mention that FCAC provides unbiased and authoritative information to help merchants understand their rights under the Code.

Interchange fees

I believe it would also be valuable to take this opportunity to briefly touch on FCAC's oversight of interchange and other core payment card processing fees. Regarding payment card fees,

payment card networks and their participants are expected to meet their commitments related to fees under the Code. The commitments related to interchange fees are:

- to disclose fees in language that is clear, simple and not misleading;*
- to notify merchants of fee changes within a minimum of 90 days of the effective date; and*
- to respect merchants' right to cancel agreements.*

It is important to note that the market sets interchange fees.

E-Transfers

We also recognize the Committee's interest in e-Transfers, a service provided by the Interac Corporation. Data from Payments Canada continues to suggest that Canadians primarily use online transfer services such as Interac e-transfer for peer-to-peer money transfers, rather than for purchasing good or services. Interac is one of the payment card network operators that has signed on to the Code of Conduct for the Payment Card Industry. FCAC protects both consumers and merchants with regard to services offered by Interac. For consumers, e-transfers are a service provided by banks. Banks must disclose the fees they charge for Interac e-Transfers to their customers. There are very specific and stringent rules around the disclosure of fees charged by banks to their customers. These are one of many obligations overseen by FCAC under the Financial Consumer Protection Framework. For merchants, Interac must ensure that payment processing companies that enable merchants to accept debit cards at the point-of-sale disclose the fees charged for this service. This is one of many requirements under the Code of Conduct for the Payment Card Industry that is overseen by FCAC. In both these cases, for consumers and merchants, disclosure of fee information enables consumers and merchants to make informed decisions about the products and services available to them. Interac fees are commercial decisions.

Conclusion – FCAC role in financial system safety and consumer confidence

To conclude, I briefly outlined FCAC's mandate and how we protect financial consumers and merchants. I have described FCAC's role in the payments ecosystem. And, I have addressed FCAC's oversight as it relates to interchange fees and e-Transfers. FCAC's role is an important one. We safeguard consumers and merchants, and equip them with the knowledge to make informed decisions. FCAC's regulatory, research, and financial education resources all work together, and contribute to supporting a strong, safe and stable financial system for the benefit of Canadians. Through effective consumer protection and a commitment to strengthening financial literacy, FCAC fosters trust. A trust that enables Canadians to navigate their financial journeys with confidence and peace of mind.

Mr. Chair, that concludes my opening remarks. I look forward to the Committee's questions.

Read Ms. Miller's full speech [here](#).

November 1, 2024 – The FCAC Announced that the Ombudsman For Banking Services and Investments Became the Sole External Complaints Body for Federally Regulated Banks.

On November 1, 2024, the Financial Consumer Agency of Canada (FCAC) announced that Canadians now have a single external complaints body for all federally regulated banks – OBSI, or the Ombudsman for Banking Services and Investments. Read the FCAC's entire announcement below.

As part of its mandate, the Financial Consumer Agency of Canada (FCAC) protects consumers of financial products and services by supervising the compliance of federally regulated banks and the ECB with their legal obligations, including the right of consumers to a fair, timely and accessible complaint-handling process.

The Honourable Chrystia Freeland, Deputy Prime Minister and Minister of Finance, designated OBSI as Canada's single ECB in October 2023. The Minister made this designation based on the recommendation of FCAC.

All federally regulated banks must now be members of OBSI. Previously, Canadian banks could choose between one of two ECBs: the Ombudsman for Banking Services and Investments (OBSI) or the ADR Chambers Banking Ombuds Office (ADRBO). The six Canadian banks that previously used ADRBO (Royal Bank of Canada, TD Bank, Scotiabank, National Bank of Canada, Tangerine Bank, and Digital Commerce Bank) have now transferred to OBSI. ADRBO will complete the investigation and resolution of complaints that it received and that remain open as of November 1. FCAC recognizes the important role played by ADRBO while acting as an ECB for several years.

The move to a single ECB addresses findings from FCAC's 2020 report on the Operations of External Complaints Bodies, which concluded that consumers face delays and complications when escalating their banking complaints.

Effective complaint handling is a cornerstone of consumer protection. The move to a single ECB is good news for consumers and further strengthens complaint handling in Canada. When combined with the complaint-handling requirements introduced under Canada's Financial Consumer Protection Framework, this change will provide Canadians with a more effective complaint-handling system in banking.

OBSI is a national, independent and not-for-profit organization that has been assisting Canadian banking consumers in resolving disputes for over 25 years. As the single ECB, OBSI is responsible for providing a fair and impartial process for consumers whose complaints have not been resolved to their satisfaction or dealt with in a timely manner by banks.

One of FCAC's key roles is to supervise the complaints-handling system within banks, as banks have a legislative responsibility to handle consumer complaints. Consumers can report their complaints to FCAC, but the Agency does not resolve individual disputes. FCAC uses information from consumer complaints to inform its supervisory activities and monitor trends and issues that may impact financial consumers.

Read the FCAC's announcement [here](#).

OBSI's official website was launched on November 1, 2024. It can be accessed [here](#). The following is the official statement as provided on the website's homepage.

Starting today, the Ombudsman for Banking Services and Investments (OBSI) will serve as Canada's sole designated External Complaints Body (ECB) for banking. From today, OBSI will be accepting complaints from consumers of all federally regulated banks. This decision, made by the Honourable Chrystia Freeland, Deputy Prime Minister and Minister of Finance, streamlines the complaint resolution process for consumers across the country.

The selection of OBSI followed a fair, transparent and competitive application process in 2023. By establishing a single ECB, the government replaces the previous multiple-ECB model, which was considered less efficient, confusing for consumers and inconsistent with international best practices. This change addresses inefficiencies and complexities faced by consumers when escalating banking complaints, as highlighted in the Financial Consumer Agency of Canada (FCAC)'s 2020 Industry Review: Operations of External Complaints Bodies.

"We are pleased to welcome National Bank of Canada, Royal Bank of Canada, Scotiabank, Tangerine Bank, and TD Bank as participating firms," said Sarah Bradley, Ombudsman and CEO of OBSI. "This transition will reduce consumer confusion and enhance the effectiveness of complaint handling for transitioning banks and their customers."

OBSI has proactively prepared for this transition by collaborating with transitioning banks and the FCAC. Since its designation last year, OBSI has engaged in a comprehensive process of planning and preparation. In advance of the transition, we have undertaken significant internal improvements, including:

- *Workforce growth*
- *Operational efficiencies development*
- *System and process improvements*

As a result, OBSI is fully and well prepared to meet the needs of all consumers and Canadian banks starting today.

With the consolidation of banking complaint handling under OBSI, the organization will be responsible for providing ombuds services to all federally regulated Canadian banks. OBSI currently has more than 1,500 participating firms, including banks, trust companies, and credit unions, as well as virtually all investment firms across Canada.

-30-

Canada's Ombudsman for Banking Services and Investments (OBSI) is a national, independent, not-for-profit organization that helps resolve and reduce disputes between consumers and

financial services firms in both official languages. OBSI is responsive to consumer inquiries, conducts fair and accessible investigations of unresolved disputes, and shares its knowledge and expertise with all stakeholders and the public. If a consumer has a complaint against an OBSI-participating bank or investment firm that they are not able to resolve with the bank or firm, OBSI will investigate at no cost to the consumer. Where a complaint has merit, OBSI may recommend compensation up to a maximum of \$350,000.

Read Investment Executive's coverage of OBSI's launch [here](#).

September 24, 2024 – OSFI-FCAC Risk Report – AI Uses and Risks at Federally Regulated Financial Institutions

On September 24, 2024, the FCAC and the Office of the Superintendent of Financial Institutions (OSFI) published a joint report reviewing federally regulated financial institutions' use of AI, including the associated risks, and the practices that have been put in place to mitigate these risks. The report identifies potential benefits of AI for financial consumers, such as enhanced customer engagement, as well as potential risks, such as fraud, improper use of consumer data and discriminatory bias. While the report has been out since September 2024, a brief summary of the report has been included below to refresh memories regarding its contents.

The joint report, *OSFI-FCAC Risk Report—AI Uses and Risks at Federally Regulated Financial Institutions*, examines the rapid integration of artificial intelligence (AI) within Canada's financial sector, highlighting its potential benefits and associated risks.

Key Findings:

- **Increased AI Adoption:** The report notes a significant rise in AI usage among financial institutions, with approximately 50% implementing AI solutions by 2023, and projections indicating this will reach 70% by 2026.
- **Primary AI Applications:** Financial institutions are leveraging AI for various purposes, including operational efficiency, customer engagement, document creation, and fraud detection.
- **Emerging Risks:** The adoption of AI introduces several challenges, such as data privacy and security concerns, model risks, legal implications, and business-related risks.

Mitigation Strategies:

To address these challenges, the report suggests implementing practices aligned with the EDGE principles—Explainability, Data, Governance, and Ethics. These principles were previously outlined in the 2023 report "A Canadian Perspective on Responsible AI," a collaboration between OSFI and the Global Risk Institute (GRI).

The report emphasizes that while AI offers numerous advantages, it also amplifies existing risks and introduces new vulnerabilities. Financial institutions are encouraged to adopt robust risk management frameworks to navigate the evolving AI landscape responsibly.

Read FCAC and OSFI's report [here](#).

August 2024 – The FCAC Informed CAFII It Has Deprioritized (Withdrawn) Its Proposed Guidelines on Complaint-Handling Procedures for Trust and Loan Companies and Insurance Companies.

CAFII Executive Director Keith Martin informed the CAFII Board, EOC, and Market Conduct & Licensing Committee members that, after submitting a letter to the FCAC stipulating CAFII's concerns around its proposed guidelines on complaint handling procedures, the FCAC has agreed to deprioritize its work on the guideline. Therefore, the guideline will remain "on hold" for the foreseeable future. K. Martin's email is included below.

Hello CAFII Board, EOC, and Market Conduct & Licensing Committee Member,

CAFII made a submission earlier this year to the FCAC on its "Guideline on Complaint-Handling Procedures for Trust and Loan Companies and Insurance Companies." The submission, sent to the FCAC in February 2024, suggested that the Guideline was outside of the FCAC's jurisdiction and that existing regulations and guidelines around complaints already achieved what the FCAC was intending.

The FCAC has just reached out to CAFII to provide an update on the Guideline. Shanay Smith and I met virtually today with Diana Iaconi, Manager, Regulatory Guidance and Insights, Supervision and Enforcement Branch, and Tammy Maheral, Senior Compliance Officer, FCAC.

Ms. Iaconi said that the FCAC has decided to "deprioritize" the work on the Guideline, and as such, the Guideline is "on hold for the foreseeable future," and no final version will be produced at this time. If that decision changes, the industry will be advised, and a new round of consultations will begin.

While stated diplomatically by the FCAC, I believe this essentially means that the Guideline has been withdrawn.

This will be on the Agenda for the September 17, 2024, EOC meeting for discussion.

Thank you,

--Keith

Keith Martin

Executive Director / Directeur general

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

July 4, 2024 – The FCAC Welcomes Expanded Mandate Giving Oversight Into Open Banking.

In an article published by *Wealth Professional* on July 4, 2024, it was announced that, thanks to the federal budget, the Financial Consumer Agency of Canada (FCAC) has acquired the right to oversee the potential implementation of open banking in Canada. Due to the passing of the Budget Implementation Act 2024, FCAC expanded its mandate to officially assume the responsibility of “overseeing, administering, and enforcing Canada’s consumer-driven Banking Framework.” Further legislation will be announced in the Fall, addressing issues around liability, consent, and technical standards.

This does not mean Canada will suddenly adopt open banking; many Canadians have expressed hesitation in sharing their financial information with fintechs and businesses.

The new federal budget has allocated \$1 million to fund an informational campaign on the new framework for opening banking. The framework will require “robust and secure sharing of data relating to financial products.” However, the first legislative step will only “allow partial access to Canadians’ financial management with ‘read-only’ capabilities.”

Read the full article on [the Wealth Professional website](#).

February 5, 2024 - CAFII Comments on FCAC Consultation on Complaints Handling Processes for Insurance Companies FINAL.

5 February, 2024

Judith Robertson, Commissioner, Financial Consumer Agency of Canada (FCAC)
Financial Consumer Agency of Canada
Supervision and Enforcement Branch
427 Laurier Avenue West, 5th floor
Ottawa, ON K1R 1B9
compliance@fcac.gc.ca

Dear Ms. Robertson,

Re: Public Consultation—FCAC's Proposed Guideline on Complaint-Handling Procedures for Trust and Loan Companies and Insurance Companies

CAFII would like to thank the Financial Consumer Agency of Canada (FCAC) for the opportunity to comment on your ***FCAC's Proposed Guideline on Complaint-Handling Procedures for Trust and Loan Companies and Insurance Companies***, and we would also like to thank the Agency for providing us with an extension to the deadline for comments to 5 February, 2024.

The FCAC proposes to extend the existing *Guideline on Complaint-Handling Procedures for Banks and Authorized Foreign Banks*, which was published on January 27, 2022 and came into force on June 30, 2022, to other financial services entities including federally chartered insurance companies.

It is the view of CAFII that the proposed application of the Guideline to the insurance sector is outside the jurisdiction of the FCAC and might be viewed as unconstitutional, and therefore subject to challenge. As such, we are requesting that if the FCAC is able to demonstrate that the proposed Guideline is within its jurisdiction, a new round of consultations begin at which time we would be prepared to offer more detailed comments.

If the FCAC is able to demonstrate that requiring insurers to comply with this Guideline falls within its jurisdiction, the primary comment we would make is to remind the FCAC that the Canadian Council of Insurance Regulators (CCIR) and the Canadian Insurance Services Regulatory Organizations (CISRO) have a mechanism in place for reporting on complaints, which insurance companies adhere to, the Guidance, Conduct of Insurance Business and Fair Treatment of Customers. If the FCAC has identified deficiencies in the framework from CCIR and CISRO for complaint handling and positive consumer protection outcomes, sharing those with industry in an evidence-based discussion would be productive to advance our shared goals. Furthermore, we would encourage FCAC to engage with CCIR and CISRO to harmonize the approach to complaint reporting, to avoid creating onerous new requirements and as a

consequence, a non-harmonized and disjointed approach. As insurance is provincially regulated we seek as harmonized an approach as possible, and the introduction of a new more onerous federal requirement moves the industry in the opposite direction.

Federally-regulated insurance companies currently report to the FCAC under the provisions of the *Insurance Companies Act*. The proposed Guideline with new expectations around reporting would significantly increase the regulatory burden on insurance companies. The Guideline would change the definition of complaints to capture any dissatisfaction and creates a requirement around reporting on level 1 complaints. We have concerns about this broadened definition and expanded reporting requirements that could also result in duplicate reporting.

There are unique requirements to the FCAC complaints procedures including around timelines that are different from what our members comply with in respect to CCIR and CISRO complaints-handling expectations. If this Guideline were introduced, it would result in insurance companies needing to make significant investments in processes and technology to allow for this expanded reporting. Additionally, there are pending regulatory changes facing the industry associated with complaint handling and reporting. We would draw attention to the fact that the Autorité des marchés financiers (AMF) is due to release new regulations around the approach to complaints and dispute resolution in Quebec, and CCIR is currently in discussions with industry around a new definition of complaints and additional reporting requirements. Adhering to potentially three different complaint handling and reporting regimes increases operational complexities for industry.

In the absence of evidence-based deficiencies in the current CCIR and CISRO framework and given the potential operational complexities outlined, we would respectfully recommend FCAC consider withdrawing this Guideline.

Should you require further information from CAFII or wish to meet with representatives from our Association on this submission or any other matter at any time, please contact Keith Martin, CAFII Executive Director, at keith.martin@cafii.com or 647-460-7725.

Sincerely,
Rob Dobbins
Board Secretary and Chair, Executive Operations Committee

The Department of Finance

January 20, 2025 – Email Exchange Between The Department of Finance and CAFII To Set Up a Meeting in 2025

To: Keith Martin

Sent: Mon 2025-01-20 1:51 PM

To: Radley, Mark <Mark.Radley@fin.gc.ca>

Cc: Robyn Jennings; Lara Doig

Subject: CAFII Request to Meet

Hello Mark,

I hope it's not too late to wish you a happy new year!

We have exchanged emails in the past regarding the Department of Finance amendments to the criminal interest rate, and we made a formal written presentation to the Department on this matter.

That specific file is not the reason for my reach out, however. CAFII regularly seeks to exchange information with regulators and policy-makers as part of our efforts to have an open and transparent dialogue on matters of mutual interest.

In that vein, I am organizing a 90-minute meeting with the FCAC in March, 2025 in Ottawa, 45 minutes for me to present some of our key priorities as well as research findings—and the remainder of the time to engage in dialogue, hear about its priorities, and share information on issues of mutual interest. I would be accompanied by volunteers from CAFII's membership, probably 5-6.

Mark, I'd like to ask you if I could have a similar 90-minute meeting with you and your colleagues from the Department of Finance.

The preferred date for the FCAC is March 17, at 10am; so I would like to request to meet you and your colleagues **March 17 from 2-3.30pm.**

If that does not work, other options for us to meet would be March 4 (2-3.30pm); or March 6 (10-11.30am).

I do hope that this is possible, and I would like to thank you in advance for considering this request.

Personal regards,

--Keith

Keith Martin

Executive Director / Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

www.cafii.com

[Visit the CAFII LinkedIn Page](#)

Making Insurance Simple and Accessible for Canadians
Rendre l'assurance simple et accessible pour les Canadiens

From: Radley, Mark Mark.Radley@fin.gc.ca

Sent: Mon 2025-01-20 4:38 PM

To: Keith Martin

Cc: Robyn Jennings; Lara Doig

Hi Keith,

No, not yet – happy new year to you too!

Sounds great – we would be happy to meet. Your preferred time of March 17 2-3:30pm would work well.

Mark

From: Keith Martin

Sent: Fri 2025-02-21 10:09 AM

To: Radley, Mark <Mark.Radley@fin.gc.ca>

Cc: Robyn Jennings; Lara Doig

Hello Mark,

I am following up on CAFII's meeting with you and colleagues on March 17, 2025.

Can you give me the exact address/floor we should go to?

A favour to ask of you:

- Is there a restaurant you can recommend near your offices, which my delegation from CAFII would have lunch at prior to our meeting?

As an update, I will be accompanied by 6 people:

CAFII Attendees, federal Department of Finance Meeting in Ottawa, March 17, 2025

Karyn Kasperski, RBC Insurance and CAFII Executive Operations (EOC) Committee Chair;

John Burns, Securian Canada and EOC Vice Chair;

Rob Dobbins, Assurant, and former EOC Chair;

Andrea Stuska, TD Insurance and Chair of the Research and Media Committee;

Michelle Costello, CUMIS/The Co-Operators and former Vice Chair of the Research & Education Committee;

Keith Martin, CAFII Executive Director;

Robyn Jennings, CAFII Research Analyst.

Thank you!

--Keith

Keith Martin

Executive Director / Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

www.cafii.com

[Visit the CAFII LinkedIn Page](#)

Making Insurance Simple and Accessible for Canadians
Rendre l'assurance simple et accessible pour les Canadiens

From: Radley, Mark Mark.Radley@fin.gc.ca

Sent: Mon 2025-02-24 5:31 PM

To: Keith Martin

Cc: Robyn Jennings; Lara Doig

Hi Keith,

Sorry for the slow response.

The exact address is 90 Elgin Street, 13th floor. That said, we will have someone meet your group in the lobby to get you through security.

For restaurants, here are three recommendations so you can make a choice depending on your group's preferences:

[Cocotte Bistro](#) (3 minute walk) – an upscale French bistro

[Brown's Socialhouse](#) (4 minute walk) – relaxed environment, good selection of food

[Thali](#) (7 minute walk) – excellent Indian food

Also – could you provide me some topics that you wish to discuss? I can make sure we have the right people around the table on our side.

Mark

From: Keith Martin

Sent: Thu 2025-02-27 11:14 AM

To: Radley, Mark <Mark.Radley@fin.gc.ca>

Cc: Robyn Jennings; Lara Doig

Hello Mark,

Thank you for this information below.

Regarding topics for our meeting, I will be sharing a 45 minute presentation that touches on independent research we have done at CAFII with research firms (Pollara, LIMRA, Deloitte) on topics like the views of consumers of credit protection insurance (CPI); technological developments and trends around CPI; and research from LIMRA that shows that Canadian homeowners are vastly underinsured and uninsured, with some interesting nuggets around themes around demographics for this group.

I will also share some of our priorities, including around regulation, such as principles-based regulation, harmonization, and the fair treatment of customers (FTC).

My members focus on credit protection insurance, which are optional products (like life, disability, critical illness, and job loss insurance) offered in conjunction with a loan instrument like a mortgage, HELOC, or loan. In general, these are unwritten by insurers and offered by distributors like banks or credit unions.

We also want to hear about your priorities, and engage in a dialogue and relationship-building meeting that is a first step in producing a line of communication between CAFII and the Department of Finance. We are principally regulated by provinces and Territories, but we have had interactions with your Department recently and we thought it was important to develop this line of communication.

While in Ottawa we are also meeting with the FCAC. We will be meeting with:

Shereen Miller, FCAC Commissioner

Frank Lofranco, Deputy Commissioner, Supervision and Enforcement Branch

Supriya Syal, Deputy Commissioner, Research, Policy and Education Branch

Rana Abu Naameth, Director, Regulatory Guidance and Coordination

Stephanie Duhaime, Director, Program and Policy Innovation
Marilyn Leblanc, Director, Secretariat and Office of the Commissioner
Eric Dagenais, FCAC title not clear, formerly Senior Assistant Deputy Minister, Innovation, Science and
Economic Development Canada
Anne Gorman, Chief of Staff

I hope this is helpful, Mark. Please don't hesitate to reach out to me if you have any questions or would like
to add anything to the meeting topics.

Thanks,

--Keith

Keith Martin

Executive Director / Directeur général
Canadian Association of Financial Institutions in Insurance
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Canadiens*

December 20, 2024 – Email From The Department of Finance To CAFII Regarding FES 2024 and OIC Updates

From: Radley, Mark <Mark.Radley@fin.gc.ca>

Sent: December 20, 2024 9:39 AM

To: Radley, Mark <Mark.Radley@fin.gc.ca>

Cc: Loosen, Anne <Anne.Loosen@fin.gc.ca>; Islam, Tanjana <Tanjana.Islam@fin.gc.ca>; Chevassu, Nathalie <Nathalie.Chevassu@fin.gc.ca>

Subject: FES 2024 and OIC Updates / Mises à jour sur l'Énoncé économique de l'automne de 2024 et le décret

Hello all,

I'm writing today regarding two updates on predatory lending.

First, Budget 2024 announced the Government's intent to prohibit offering credit at a criminal rate of interest. This measure received Royal Assent on June 20, 2024, and an Order in Council was recently made to bring this amendment into force. This Order in Council will be published in the *Canada Gazette Part II* on January 1, 2025 and will come into force on that same date.

Second, as you may already be aware, the [2024 Fall Economic Statement](#) announced:

- the government's intent to amend the payday lending exemption in the *Criminal Code* to prohibit the sale of credit insurance products in connection with a payday loan.
- the government's intent to make amendments to the payday lending exemption within the *Criminal Code* requiring a minimum term on payday loans of 42 days and for lenders to accept payment in installments. The government will provide 12 months for industry to transition to the new conditions.

Please let me know if you have any questions or would like to meet with myself and my team to discuss.

Bonjour à tous,

Je vous écris aujourd'hui pour vous faire part de quelques mises à jour sur les prêts à conditions abusives.

D'abord, le budget 2024 a annoncé l'intention du gouvernement d'interdire l'offre de crédit à un taux d'intérêt criminel. Cette mesure a reçu la sanction royale le 20 juin 2024, et un décret a récemment été pris pour faire entrer en vigueur cette modification. Ce décret sera publié dans *la partie II de la Gazette* du Canada le 1er janvier 2025 et entrera en vigueur à cette même date.

Deuxième, comme vous pourriez déjà le savoir, l'[Énoncé économique de l'automne de 2024](#) a annoncé :

- l'intention du gouvernement de modifier l'exemption du *Code criminel* relative aux prêts sur salaire de façon à interdire la vente de produits d'assurance-crédit en lien avec un prêt sur salaire;
- l'intention du gouvernement d'apporter des modifications à l'exemption du *Code criminel* relative aux prêts sur salaire de façon à exiger un terme minimal de 42 jours sur les prêts sur salaire et que les prêteurs acceptent les paiements échelonnés. Le gouvernement accordera 12 mois à l'industrie pour faire la transition vers les nouvelles conditions.

Faites-le moi savoir si vous avez des questions ou souhaiteriez me rencontrer, moi et mon équipe, pour discuter.

Merci,

Mark Radley, CFA

Director | Directeur

Consumer Affairs | Consommation en matière financière

Financial Services Division | Division des services financiers

Financial Sector Policy Branch | Direction de la politique du secteur financier

Department of Finance Canada | Ministère des Finances Canada

90 Elgin Street, Ottawa, ON K1A 0G5 | 90, rue Elgin, Ottawa, ON K1A 0G5

Government of Canada | Gouvernement du Canada

mark.radley@fin.gc.ca | 613-447-8103



Department of Finance
Canada

Ministère des Finances
Canada

Canada

December 16, 2024 – The Department of Finance Released Its Fall Economic Statement, which Made Explicit Mention of Insurance

On December 16, 2024, CAFII's Executive Director, Keith Martin, emailed the EOC Committee a copy of the Department of Finance Canada's Fall Economic Statement. He specifically highlighted the 48 references to insurance within the document, including three mentions of credit protection insurance. K. Martin's email has been included below.

From: Keith Martin (CAFII) keith.martin@cafii.com

Sent: December 16, 2024 5:20 PM

Subject: CAFII: Federal Government Fall Economic Statement Does Not Mention Including Insurance in the Calculation of Interest

Hello, CAFII and EOC members,

I have attached the federal government's Fall Economic Statement.

There are 48 references to insurance, including flood insurance and mortgage insurance, and three are on credit protection insurance. All indicate the government seeks to prohibit the sale of credit insurance for payday loans; there is no reference I could find to including insurance in the calculation of interest. A search of the document also finds no reference to "calculation of interest."

The three references to credit protection insurance are as follows:

Pages 63-64

The government furthered its crack down on predatory lending in Budget 2024 by enhancing enforcement of the criminal rate of interest through amendments to the Criminal Code. Budget 2024 also announced the launch of the federal government's work with provinces and territories to harmonize and enhance consumer protections across Canada. 64 Chapter 1 Credit insurance, when offered in connection with a payday loan, can add to the already high costs of the loan, often with little benefit to the consumer. Some provinces already prohibit the sale of credit insurance in connection with a payday loan and have identified this as a best practice. In August 2024, the government held consultations on several proposed amendments to the Criminal Code, including on prohibiting the sale of credit insurance in connection with a payday loan, and on requiring a minimum repayment term on payday loans of 42 days and for lenders to accept payment in installments. To protect vulnerable Canadians, the 2024 Fall Economic Statement announces the government's intent to amend the payday lending exemption in the Criminal Code to prohibit the sale of credit insurance products in connection with a payday loan. To make repayment schedules more manageable and lower default risks, the 2024 Fall Economic Statement also announces the government's intent to make amendments to the payday lending exemption within the Criminal Code requiring a minimum term on payday loans of 42 days and for lenders to accept payment in installments. The government will provide 12 months for industry to transition to the new conditions.

Page 227

Cracking Down on Predatory Lending In FES 2024, the government proposes to amend the Criminal Code's payday lending exemption (section 347.1) under the criminal interest rate provision to i) require a minimum term of 42 days and repayment in installments, and ii) prohibit credit insurance charges, on payday loans.

Page 235

The government is also Cracking Down on Predatory Lending by prohibiting the sale of insurance on payday loans, adding a minimum term to payday loans of 42 days, and requiring that repayment of these loans be done in installments. This will help vulnerable Canadians, as payday loans are disproportionately taken up by people who experience financial insecurity. According to a 2022 survey on high-cost loan borrowers during the pandemic, around 26 percent of respondents stated that their annual individual income was less than \$15,000, 42 percent of the respondents reported their income between \$15,001 to \$25,000, and 24 percent of respondents indicated their income range was between \$25,001 to \$40,000. The reliance on predatory lending during the pandemic is concerning as lower-income Canadians faced disproportionately higher costs. These products are often aggressively marketed, costly, and provide little benefit to consumers, and the government is ensuring such debt traps don't become routine again.

Read the Department of Finance Canada's Fall Economic Statement [here](#).

October 11, 2024 – CAFII's Executive Director Provided an Email Update on the Ongoing Interactions with the Department of Finance Regarding the Proposed Amendments to the Calculation of Interest Rates.

On October 11, 2024, CAFII's Executive Director, Keith Martin, contacted the EOC and Board to update them on the ongoing conversation he is having with the Department of Finance regarding its proposed amendments to the criminal code to include insurance in the calculation of interest rates. K. Martin's email has been included below.

Update re: Department of Finance Calculation of Interest Rates

Hello Board, EOC, and Market Conduct & Licensing Committee Member,

This is an update on the interactions with the Department of Finance on its proposed amendments to the Criminal Code to include insurance in the calculation of the criminal interest rate.

CLHIA had a follow up meeting with the Department of Finance on Wednesday, October 9. I have had a discussion with Luke O'Conner to get further details. The finance department officials acknowledged that the consultation period was short, and that said that they received more feedback than they expected. They also said that they were considering a second consultation.

They asked CLHIA for information on how many customers request creditor insurance after a loan or credit is issued (days or weeks after, as opposed to at time of sale). Luke O'Connor tells me that they are in no rush for this and said that receiving it in December was fine.

I shared with Luke my concern around why the Department was asking for this information. Insurance is sold not bought, and the moment to share information about this optional product is at the time of sale. I am concerned that the Department may be thinking about a deferred sales model. Australian regulators introduced a deferred sales model there some years ago, and it decimated the industry. A deferred sales model would result in underinsured and uninsured Canadians who would otherwise obtain the insurance not gaining coverage. I believe we may need to share some of these points with the Department.

We asked for a meeting with the Department in our written submission on September 11, and if they do not respond in a week or so I will follow up.

Thank you,

--Keith

Keith Martin

Executive Director / Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

September 11, 2024 - CAFII Submission to the Department of Finance on Proposed Amendments to the Criminal Code FINAL.

September 11, 2024

Mr. Mark Radley
Director, Consumer Affairs, Financial Sector Policy
Department of Finance
14th Floor, 90 Elgin Street
Ottawa, Ontario K1A 0G5

Copy to:

Ms. Anne Loosen, Economist, Department of Finance
Ms. Tanjana Islam, Analyst, Department of Finance
Mr. Connor Ward, Economist, Department of Finance

Dear Mr. Radley,

Re: Department of Finance Draft Amendments to the Criminal Code

The Canadian Association of Financial Institutions in Insurance (CAFII) would first like to thank you for the opportunity to provide feedback to proposed amendments to the Criminal Code, specifically with respect to provisions to include all insurance costs in the calculation of interest.

Amendments do not Align with Policy Intent

CAFII understands that the amendments to the Criminal Code intend to better regulate predatory lending and payday loans; however, the department's proposed approach has the unintentional potential to make insurance less accessible to Canadians. The proposed amendments take a broad approach to including all insurance premiums in the calculation of interest. As a result, the amendments risk capturing products like optional credit protection insurance (CPI) and optional balance protection insurance (BPI)¹ offered by Federally Regulated Financial Institutions (FRFIs). These insurance protections, as discussed in more detail later in this letter, offer critically important insurance protections to Canadians, a majority of which are underinsured or uninsured.

The proposed amendments could capture optional CPI and optional BPI because they are "related to" the lending product in the sense that if the insured borrower incurs a life or health related event and makes a claim under the policy, a claims payout will be applied against their lending obligation.

¹ Credit Protection Insurance and Balance Protection Insurance are included in the class of insurance named Creditor's Group Insurance within provincial insurance acts.

Although our comments focus on CPI and BPI, CAFII notes that the current definition of “insurance charge” in the amendments could be interpreted to include many forms of insurance beyond CPI and BPI, such as mortgage default insurance, property insurance, and auto insurance distributed by either the lender or other third parties to the borrower where a lender is named as loss payee.

CAFII does not believe that CPI or BPI offered by FRFIs, or the other aforementioned insurance products were the products or lenders that the Department of Finance intended to target in this effort. These FRFIs are already well-regulated, tied-selling is prohibited, and they have robust consumer protections in place. As drafted, the proposed amendments could have a number of unintended consequences on consumers, lenders, and insurers.

For group policies such as CPI, insurance policy pricing is also not based on interest calculations or credit risk but instead is based on actuarial modeling tied to such factors as longevity and morbidity risks. These proposed amendments could make accessing insurance more difficult for Canadians who may need it the most. For example, less healthy, older clients who require credit will face greater challenges getting insurance if these amendments are passed since their insurance premiums may be higher given their insurance health risks being covered, which could bring the cumulative “interest” into the criminal range.

The core issue here is that the definition appears to include any optional insurance product offered in conjunction with (but separate from) a credit instrument like a mortgage, loan, Home Equity Line of Credit (HELOC), or credit card from any insurance provider. There seems to be no consideration that optional insurance fills an important consumer need to provide life, health, or job loss protection that is unrelated to the extension of credit. In summary, the scope of this definition seems much broader than necessary to adequately address predatory lending and payday loans.

Further, if CPI/BPI insurance is no longer available to certain consumers, they will have lost access to the benefit of insurance payments that could have kept their credit obligation in good standing during difficult times, which could, in turn, negatively impact their credit rating and ultimately push them towards the predatory lending market. This would actually be contrary to the policy objective of protecting consumers from predatory lending.

Therefore, any adjustment to the definition of “credit charge” or “interest” needs to be narrowed to ensure that it does not capture more than intended to avoid any negative consequences for consumers.

It is also unclear whether the amendments are intended to capture personal products only or include business credit cards, loans, operating lines of credit, or mortgages as well.

CPI and BPI Premiums Should Not be Included in the Determination of Interest Rate Levels

CPI and BPI is a category of optional group insurance products that provides coverage if a consumer passes away, becomes critically ill or disabled, or in some instances, loses their job. Enrolling in creditor

insurance does not impact the credit decision or the extension of credit or borrowing rate from the lender, and it is completely optional. The choice to enrol for CPI or BPI is based on whether the consumer believes it is appropriate based on their financial circumstances. It is often chosen by consumers for peace of mind and its ease of execution since no medical assessment is required. The premium charged can fluctuate on a monthly basis based on outstanding balance of the debt and the consumer's age along with other actuarially determined health risk factors. This product can be cancelled at any time by the consumer with a refund of pro-rated premiums.

At a policy level and as a matter of principle, CAFII is of the view that insurance premiums charged by FRFIs in association with loan instruments offered by them do not constitute interest either conceptually or practically, and that it is inaccurate to include those premiums in the calculation of interest rate. These products are not tied to the extension of credit, nor do they protect against credit risk, but rather they provide optional insurance risk protection against a borrower's life, health, and employment-related risks. These insurance coverages stand separate from the credit instrument and are transacted under separate contracts for customers who choose to purchase this protection.

The calculation of the cost of borrowing in the *Financial Consumer Protection Framework Regulations* aligns with this approach by excluding charges for optional insurance (and costs for other types of insurance) from the cost of borrowing calculation. On the other hand, including interest charges in the calculation of criminal rates of interest does not align with the cost of borrowing calculations currently disclosed to customers under federal law.

More specifically, the Financial Consumer Agency of Canada (FCAC) has specified which charges are and are not associated with the cost of borrowing:

Section 48 (2) Charges not included in the cost of borrowing:

The cost of borrowing for a loan does not include any of the following fees or charges:

- a) *Charges for insurance on the loan if*
 - i) *The insurance is optional*
 - ii) *The borrower is its beneficiary, and the amount insured reflects the value of an asset that is security for the loan*

Similarly, s.70 of the Quebec CPA also specifically excludes optional insurance when defining "credit charges":

Section 70. ...Despite any provision to the contrary, the following do not constitute credit charge components: (a) the premium for insurance of persons if the merchant does not subject the entering into of the credit contract to subscribing to or participating in the insurance...

Optional CPI and BPI fill an important need of providing Canadian consumers with life, health, disability and job loss protection based on consumer personal circumstances. The amendments could limit access to insurance for consumers who might not be able to afford or qualify for more traditional individual insurance products. Some customers might not receive an offer of CPI or BPI from the lender based on where the interest rate calculation falls for their credit product following calculation with insurance included, to avoid the risk of breaching the criminal rate of interest provisions. This could result in

unintended negative consequences for consumers, leading to increased complaints associated with unfair treatment and limited access to insurance that they desire, and could result in underserved or unserved consumers not having access to these protections and coverages.

For example, one use case which may result in undue consumer harm would be a client in their mid-50s who is seeking an unsecured debt consolidation loan. These loans are often used to combine multiple repayment obligations, which helps improve cash flow and credit history for consumers. Clients seeking debt consolidation help may not have access to traditional insurance coverage. As a result of these proposed changes, these same clients may no longer be in a position to benefit from the protection offered by CPI. This could leave consumers unreasonably exposed should job loss, critical illness, or death occur.

The calculation of interest would be very difficult to administer on a month-to-month basis as a calculation would need to consider the fluctuation of insurance charges based on outstanding debt amount and changes in the customer's age to ensure that the interest charge does not exceed the criminal interest rate threshold. Furthermore, it is possible that a customer could obtain optional CPI and BPI through a channel other than a lender, and thus, the lender may not know about the existence or cost of the coverage, leading to the risk of inadvertent non-compliance. The possibility also exists that a one-month fluctuation would result in the threshold being met, and then unmet in a subsequent month. Is the FRFI required to reinstate the insurance in those months where the threshold is not met?

The lending institution's lack of visibility regarding insurance premiums requires emphasizing. Lending institutions do not determine the premiums, rates, or conditions for insurance offered in conjunction with a loan instrument. More specifically, lending institutions are not "charging" the premium; they are treating it as a bill payment. The money does not go to the lending institution; it goes to the insurance company.

In some situations, it is not possible to monitor charges from third-party insurers so they can be added to other charges. Lending institutions do not directly control what insurers will charge for optional insurance and sometimes have no visibility in terms of the premiums being charged to customers obtaining insurance against their loan. For example, if a mortgage is sold through a broker to be held by a bank who then arranges for the credit to be optionally insured by an insurance company not affiliated with that bank, it would not be able to monitor the 35% threshold as the lending institution would have no visibility on the existence of optional Insurance being in place and even less information about the specific rate.

For these reasons, the proposed amendments would only increase the costs of providing loans, which may, in turn, restrict access to credit.

We also note that insurers can amend premiums on notice to customers from time to time. In addition, if the legislation is broad enough to capture other insurance where the lender is named as a loss payee

(like property insurance or auto insurance), then compliance with the legislation becomes even more challenging. Lenders would not know the premiums consumers pay for such insurance.

Lenders should not face the risk of criminal sanctions because of changes to the cost of insurance determined by the actions of the consumer or the insurer.

If interest does exceed the threshold as a result of premiums for CPI or BPI, it is unclear what the consequences would be. If the Department of Finance believes insurance should be cancelled, we note that CPI and BPI are normally set up as a group insurance policy with individual insurance certificates issued to customers. The lender or insurer normally cannot unilaterally cancel the coverage unless the group policy is terminated, which would impact all customers who have enrolled in the insurance product.

It is an important principle of insurance that, once obtained, the provider cannot cancel the coverage unless premiums have not been paid or some other termination event specified in the terms of the insurance has occurred. Forcing the cancellation of CPI or BPI would be harmful to consumers as they would lose the insurance coverage they believed they needed. If the expectation is that the insurance should stay in place, then would the Department of Finance expect lenders to reduce interest rates on the underlying credit product, all while the insurer providing CPI or BPI retains the full premium? It should also be noted that financial reporting and taxation requirements have different definitions of interest than what is being proposed. With an expanded definition of interest, multiple calculations of interest would be required to demonstrate compliance with these amendments, which could potentially impact financial statements or tax return filings.

Life, Health, and Job Loss Products Provide Critical Protection for Underinsured and Uninsured Canadians

By incorporating the costs of CPI and BPI into the criminal insurance rates, the Department of Finance risks both deterring and preventing Canadians' optional purchase of insurance even though these products serve an important role in the marketplace. The credit instruments that CPI and BPI are associated with are not at all similar to payday loans and any implication that they should be viewed similarly is misleading and inaccurate.

CAFII believes that restricting access to these optional insurance products for these loan instruments will have an undesirable and harmful impact on Canadian consumers. We believe it could result in consumers who would otherwise benefit from these coverages not having the opportunity to obtain these protections, which could very well compound an existing underinsurance problem.

A March 2024 survey of Canadians commissioned by CAFII and conducted by independent research organization LIMRA found that Canadians are underinsured and uninsured against their lives and

health.² The study found a concerning trend among Canadian homeowners: a significant 80% lack sufficient insurance coverage, being either uninsured or underinsured with CPI or traditional life insurance³. This shortfall in coverage leaves many families inadequately protected against unforeseen life events. Low-income homeowners are significantly more likely to be uninsured compared to those in higher income brackets. Of those who are insured, 75% of low-income homeowners are underinsured, meaning they lack sufficient coverage to protect their financial well-being.

Despite the alarming rate of underinsurance, only 55% of all homeowners with credit own some form of CPI. This discrepancy is even more pronounced among low-income homeowners, who have notably less CPI coverage compared to their high-income counterparts. This suggests a gap in understanding of and access to CPI, highlighting the need for increased awareness and education about this form of insurance and its benefits.

While 80% of Canadian homeowners are underinsured or uninsured, among low-income homeowners with credit, 24% have no life or health insurance and another 10% rely solely on CPI for their insurance needs. This is significantly more than other income groups and highlights the importance of this form of protection for financially vulnerable households.

Finally, a significant portion of Canadian homeowners, 38%, fall into the category of “at risk.” These are homeowners with credit, who are uninsured or underinsured, and have survivors such as partners or dependents. This group is particularly vulnerable to financial hardship in the event of unexpected life events. Taken together, these findings demonstrate the importance of not impeding access to these insurance protections, and not unfairly tarnishing the reputation of this industry or the access to these products by underinsured and uninsured Canadians.

These products offered by banks and credit unions provide critical protections in the marketplace and treat consumers fairly. The insurance is optional; full disclosure of premiums, exclusions, and limitations are made; and the industry has a strong record around claims payout. For example, separate research commissioned by CAFII and conducted by polling company Pollara Insights found that 95% of mortgage life insurance claims were paid out.

Life and Health Insurance Is Regulated by Provinces and Territories, and Bank Distributors are Regulated by the Bank Act and the FCAC

Credit protection insurance and balance protection insurance are a class of life, health, and job loss insurance products that are regulated across the country under the jurisdiction of provincial and territorial regulators and policy-makers. While we recognize the authority of the federal government

² The full study can be found on the CAFII website here: <https://www.cafii.com/cafii-limra-insurance-among-canadian-homeowners/>

³ Underinsured is defined as Canadians with insurance coverage of less than 7-10 times their income, which is the definition used by the Financial Consumer Agency of Canada (FCAC).

with respect to the Criminal Code, the outcome of these amendments will have an impact on the perception and possible availability of products that are squarely within the jurisdiction of provinces and territories.

CAFII understands that the Department of Finance may be intending to address practices by parties not regulated by the Bank Act, federal regulation, and provincial and territorial regulators. If that is the case, we believe that the approach to take is to explicitly exempt those regulated parties and associated optional CPI and BPI products that do meet the Department's regulatory expectations and to make clear in your definitions of key terms what the legislation is intending to achieve and what parties are subject to it. The definitions should make clear that your focus is on issues related to the extension of credit by non-regulated lenders.

For greater clarity, Charter I and Charter II banks are subject to all the applicable federal regulatory requirements, including the Bank Act and oversight by the FCAC, and all CAFII members offering CPI and BPI are subject to provincial regulations and oversight. Tied-selling is prohibited, and CAFII members are committed to fair disclosure, rigorous oversight of products offered, and the fair treatment of customers.

Consultation Period is Short

While in principle, we are very concerned if optional credit protection insurance and balance protection insurance are intended to be captured by the proposed amendments, in practice, we are also concerned about such a short consultation period for a change of this magnitude. CAFII has fifteen members that represent large, complex financial institutions and there are many other industry stakeholders who would be impacted by this change. We believe that better regulatory outcomes and protections occur when there is dialogue and detailed consultation with industry; the compressed timeline for this consultation has compromised the ability to achieve this important outcome. As a result, we feel that the amendments should not be moved forward until there has been an opportunity for a fulsome engagement between the Department of Finance and industry.

Final Comments and Recommendations

If the policy intent of the proposed amendments is to address concerns around optional insurance offered in conjunction with predatory lending and payday loans, we are concerned that many other legitimate loan instruments offered by FRFIs have associated optional insurance like CPI and BPI that are being inadvertently captured by these amendments, which could lead to negative consequences for consumers. CAFII respectfully suggests that criminal provisions are not the appropriate mechanism to address concerns that the government might have relating to the cost of insurance or sales practices by non-regulated lenders. This unfairly casts a shadow of criminality over what are legitimate forms of insurance that benefit consumers. It can also have the consequence of limiting access to insurance to consumers who may benefit from it, particularly those who may be underinsured. We strongly believe that insurance premiums should continue to be excluded from the calculation of interest, as was the

approach prior to the introduction of these draft amendments and as is the current approach for calculating the cost of borrowing.

To the extent the Department of Finance is not open to removing insurance charges from the calculation of interest, the amendments should explicitly define the specific products offered that are targeted by this change as opposed to a broad, all-encompassing definition of insurance. The definition should make it clear that optional CPI and BPI insurance offered by regulated entities is not intended to be captured by the amendments and should consider an exemption for parties offering this optional insurance that are not the intended subjects of these amendments. As it stands, the broad definition could produce unintended consequences on consumers and is a disservice to many Canadian consumers who need these products and whose access to them should not be limited. At a practical level, it would be extremely difficult for industry to operationalize these proposed changes.

We encourage the Department of Finance, if it has not already done so, to engage in consultations with the provinces' and territories' insurance regulators on the amendments as insurance regulation falls under the jurisdiction of provinces and territories.

Thank you again for the opportunity to provide input and feedback on the Department of Finance's consultation on amendments to the Criminal Code. Should you require further information from CAFII or wish to meet with representatives from our Association at any time, please contact Keith Martin, CAFII Executive Director, at keith.martin@cafii.com or 647.460.7725.

Sincerely,



Karyn Kasperski
Board Secretary and EOC Chair

About CAFII

CAFII is a not-for-profit industry Association dedicated to the development of an open and flexible insurance marketplace. Our Association was established in 1997 to create a voice for financial institutions involved in selling insurance through a variety of distribution channels. Our members provide insurance through client contact centres, agents and brokers, travel agents, direct mail, branches of financial institutions, and the internet.

CAFII believes consumers are best served when they have meaningful choice in the purchase of insurance products and services. Our members offer credit protection, travel, life, health, and property and casualty

insurance across Canada. In particular, credit protection insurance and travel insurance are the product lines of primary focus for CAFII as our members' common ground.

CAFII's diverse membership enables our Association to take a broad view of the regulatory regime governing the insurance marketplace. We work with government and regulators (primarily provincial/territorial) to develop a legislative and regulatory framework for the insurance sector which helps ensure that Canadian consumers have access to insurance products that suit their needs. Our aim is to ensure that appropriate standards are in place for the distribution and marketing of all insurance products and services.

CAFII's 15 members include the insurance arms of Canada's major financial institutions--BMO Insurance, CIBC Insurance, Desjardins Insurance, National Bank Insurance, RBC Insurance, Scotia Insurance, and TD Insurance, along with major industry players Assurant Canada, The Canada Life Assurance Company, Canadian Tire Bank, Canadian Western Bank, Chubb Life Insurance Company of Canada, CUMIS Services Incorporated, Manulife (The Manufacturers Life Insurance Company), and Securian Canada.

August 27, 2024 – Email Exchange Between CAFII and the Department of Finance About a Request From CAFII Regarding the Criminal Code.

From: Keith Martin

Sent: Tue 2024-08-27 12:03 PM

To: Mark.radley@fin.gc.ca; Anne.Loosen@fin.gc.ca

Cc: 'valerie.gillis@td.com'; 'paul.cosgrove@assurant.com'; 'Karyn Kasperski' <karyn.kasperski@rbc.com>; +4 others

Subject: Request from the Canadian Association of Financial Institutions in Insurance (CAFII)

Hello Mr. Radley and Ms. Loosen,

My name is Keith Martin and I am the Executive Director of the Canadian Association of Financial Institutions in Insurance (CAFII), whose members include Canadian banks, credit unions, and insurers. CAFII focuses on optional insurance products including life insurance offered with loan instruments like mortgages, HELOCs, and loans, as well as credit card balance protection insurance.

I am writing you about the consultation the Department of Finance is engaged in around the draft legislative amendments to the *Criminal Code*, which includes provisions to include insurance costs in the calculation of interest. We are very concerned about whether this provision intends to capture optional credit protection and balance protection insurance. These optional products provide critical protection to Canadians, and as worded it is not clear to us what the provisions you are consulting on apply to, and specifically whether optional credit protection and balance protection insurance is captured by these provisions. It should be noted that these products are not tied to the extension of credit nor do they protect against credit risk, but rather provide optional insurance risk protection against a borrowers' life and health related risks as well as in some instances, job loss, and are transacted under separate contracts for customers who wish to purchase this protection.

There are many important implications to these provisions for our members depending on their scope, and these insurance products are also under the jurisdiction of provincial and territorial regulators and policy-makers.

While in principle we are very concerned if optional credit protection insurance and balance protection insurance is intended to be captured by the proposed amendment, in practice it is also extremely problematic to announce a draft change that is intended to be implemented in four months or less (January 1, 2025). We typically request that any change that requires system changes and policy modifications have an implementation window of at minimum 12-18 months.

The consultation period is also extremely short. CAFII has fifteen members that represent large, complex financial institutions. We need time to internally formulate our feedback on any new regulatory or legislative approach, and to prepare our response.

We would be pleased to share our thoughts with you in a detailed written submission, and would like to request an extension beyond the September 11, 2024 deadline for responding to your consultation, if possible by a month. In the meantime, any clarification you can provide about the scope of the provisions with respect to the inclusion of insurance products in the calculation of interest rates would be helpful as we formulate our response.

Thank you in advance for considering this request.

--Keith Martin, CAFII Executive Director

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Keith Martin

Executive Director / Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

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From: Radley, Mark Mark.radley@fin.gc.ca

Sent: Fri 2024-08-30 4:54 PM

To: Keith Martin

Cc: valerie.gillis@td.com;paul.cosgrove@assurant.com;karyn.kasperski@rbc.com;
John.Burns@securiancanada.ca; +6 others.

Hi Keith,

Sorry for the delay in responding. Thank you for your email regarding your concerns around the consultation on potential *Criminal Code* amendments. I would note that the draft legislation is for consultative purposes

only. As such, on timelines, we have not determined or finalized any dates for next steps with regards to this draft legislation. We are awaiting all stakeholder comments to help inform next steps, including potential final legislation, and we appreciate your comments written below and look forward to receiving a formal submission on the issue.

We have noted your request for an extension on the submission deadline, which we will return to you on. If you have any interest in meeting with us so we may answer any questions you may have or to discuss your initial thoughts, please let us know and we can set something up for next week, if you are amenable.

Thank you,
Mark

From: Keith Martin

Sent: Wed 2024-09-04 5:11 PM

To: Radley, Mark <Mark.radley@fin.gc.ca>

Cc: valerie.gillis@td.com; paul.cosgrove@assurant.com; karyn.kasperski@rbc.com;

John.Burns@securiancanada.ca; +6 others

Hello Mark,

I first of all would sincerely like to thank you for your response below, which was much appreciated.

I also want to thank you for the offer of a meeting. It will be difficult to us to get this organized prior to the current deadline of September 11, 2024, but if an extension is offered I will definitely follow up with you and would welcome a meeting after that date for us to engage in a dialogue.

CAFII will be making a preliminary submission to the Department of Finance by your current deadline of September 11, but if an extension is offered we could expand on that submission with more detailed comments and as noted above, we would welcome the opportunity to participate in a meeting with you and your colleagues after that date. With additional time, I believe we can better prepare and make the meeting more robust and beneficial for you and your colleagues.

Please do not hesitate to reach out to me on this or any related matters, and thank you again for your consideration.

Regards,

--Keith

Keith Martin

Executive Director / Directeur général

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July 2024 – The Federal Department of Finance Indicated Its Intention to Include Insurance Premiums in the Determination of Interest.

The Federal Department of Finance has indicated that it intends to include insurance premiums in the determination of interest, and has provided a very short period for industry to provide written feedback. CAFII has requested an extension of the deadline, but will also be making a written submission to the Department by the October 11, 2024 deadline. CAFII has also been coordinating its approach closely with CBA and CLHIA.

Following is the correspondence between CAFII and the Department of Finance.

From: Keith Martin

Sent: September 4, 2024 5:12 PM

To: Radley, Mark <Mark.Radley@fin.gc.ca>

Cc: valerie.gillis@td.com; paul.cosgrove@assurant.com; karyn.kasperski@rbc.com;

John.Burns@securiancanada.ca; bradley.kuiper@scotiabank.com; fay.coleman@td.com; Robyn Jennings <Robyn.Jennings@cafii.com>; Loosen, Anne <Anne.Loosen@fin.gc.ca>; Islam, Tanjana

<Tanjana.Islam@fin.gc.ca>; Ward, Connor <Connor.Ward@fin.gc.ca>

Subject: RE: Request from the Canadian Association of Financial Institutions in Insurance (CAFII)

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Regards,

--Keith

Keith Martin

Executive Director / Directeur général

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keith.martin@cafii.com

T: 647.460.7725

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From: Radley, Mark <Mark.Radley@fin.qc.ca>

Sent: August 30, 2024 4:54 PM

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

Cc: valerie.gillis@td.com; paul.cosgrove@assurant.com; karyn.kasperski@rbc.com;

John.Burns@securiancanada.ca; bradley.kuiper@scotiabank.com; fay.coleman@td.com; Robyn Jennings

<Robyn.Jennings@cafii.com>; Loosen, Anne <Anne.Loosen@fin.qc.ca>; Islam, Tanjana

<Tanjana.Islam@fin.qc.ca>; Ward, Connor <Connor.Ward@fin.qc.ca>

Subject: RE: Request from the Canadian Association of Financial Institutions in Insurance (CAFII)

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Thank you,

Mark

From: Keith Martin <Keith.Martin@cafii.com>

Sent: Tuesday, August 27, 2024 12:03 PM

To: Radley, Mark <Mark.Radley@fin.qc.ca>; Loosen, Anne <Anne.Loosen@fin.qc.ca>

Cc: 'valerie.gillis@td.com' <valerie.gillis@td.com>; 'paul.cosgrove@assurant.com'

<paul.cosgrove@assurant.com>; 'Karyn Kasperski' <karyn.kasperski@rbc.com>; Burns, John

<John.Burns@securiancanada.ca>; Bradley Kuiper <bradley.kuiper@scotiabank.com>; 'Coleman, Fay'
<fay.coleman@td.com>; Robyn Jennings <Robyn.Jennings@cafii.com>

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Summary of CAFII's Meetings with the FCAC and the Federal Department of Finance in Ottawa on March 17, 2025.

On March 17, 2025, CAFII's Executive Director, Keith Martin, CAFII's Research Analyst, Robyn Jennings, and a delegation of volunteers from several CAFII member organizations went to Ottawa to meet with the Financial Consumer Agency of Canada (FCAC) and the Federal Department of Finance respectively. The meetings, which occurred over the course of the day, were both successful, generating excellent discussion from both regulatory bodies. Below is a summary of the day.

Summary of Meeting with the Financial Consumer Agency of Canada (FCAC)

The CAFII team, including volunteers, met at 9:15 a.m., prior to the meetings, to prepare for the day. In addition to the CAFII team, the following individuals were in attendance on behalf of the Association:

- Karyn Kasperski, RBC – *EOC Chair*
- John Burns, Securion Canada – *EOC Vice-Chair*
- Rob Dobbins, Assurant Canada
- Andrea Stuska, TD Canada
- Michelle Costello, CUMIS/Co-Operators

In attendance from the FCAC were:

- Shereen Miller – *Commissioner of the FCAC*
- Frank LoFranco – *Deputy Commissioner of the FCAC*
- Anne Gorman – *Chief of Staff at the FCAC*
- Eric Dagenais – *Title not clear; formerly Senior Executive at Innovation, Science, and Economic Development Canada (ISED)*
- David Weir - *Policy Subject Matter Expert*
- Stephanie Duhaime - *Director, Program and Policy Innovation*

The meeting began at 10 a.m. with introductions. Shereen Miller expressed the importance of meetings like this, particularly due to the insurance industry's ever-changing nature. She said that the FCAC is about to take on a more activist/advocate role as a regulator; a significant portion of her career has been focused on advocacy work. Two of her core values are the fair treatment of customers (FTC) and consumer protection. Therefore, consumer advocacy will only continue to grow within the FCAC.

S. Miller explained that since the FCAC now has an open banking mandate, one of the first things she did as Commissioner was to conduct a focus test on Canadians' knowledge of open banking; the findings indicated that Canadians knew very little about it. Therefore, increasing awareness and knowledge of open banking will likely be an uphill battle in terms of educating the public on its benefits. She reiterated that her primary focus is on consumer protection and education; it is simply good business practice to protect the people you serve. S. Miller commented that to have a strong depth of research, industry cooperation and collaboration are needed. Meetings like the current one encapsulate this. She concluded by remarking that, for her, the goal of the day is to learn from CAFII.

K. Martin agreed, adding that CAFII is philosophically aligned with all that S. Miller said. Collaboration makes us all better, which is another reason CAFII wanted to meet with the FCAC. With that, K. Martin dove into his presentation. He explained what CPI is, how it's sold, how it works, and why it's valuable. He explained that CAFII conducts yearly research projects, which the Association views as a kind of financial literacy tool. He mentioned the Deloitte research and the upcoming April webinar, which he invited the FCAC to attend.

At this point, S. Miller asked, of the percentage of Canadians that own CPI, how many actually end up using it versus not. K. Martin did not have the number for that specific question, however, CAFII did do claims reviews that found that 95% of claims are paid out.

K. Martin began talking about at-risk Canadians and insurance. S. Miller asked K. Martin to define at-risk and explain how it comes into play. He explained that it means those who have less than 7-10 years of their salary saved but have credit (debt) and dependents. Nearly 40% of Canadians would not meet these qualifications, meaning they do not have adequate insurance to pay off their debts while supporting their dependents should they pass away, suffer a critical illness or disability, or lose their job. CPI comes into play because it can help mitigate the risk of debt, particularly mortgage, should the primary earner suffer one of these life events.

Continuing on the topic of debt, there are significant levels of debt among Canadians. L&H insurance is important because unforeseen events can happen at any time to anyone. At this point, Eric Dagenais commented that if someone loses employment, the bank will work with them to delay payments because the bank doesn't want to foreclose on a mortgage. How is CPI different than this, and what additional protection does it provide compared to what the bank will do? K. Martin explained that with CPI, the policy would automatically kick in if a life event occurred as per the policy's stipulations.

As the presentation continued, K. Martin stressed the importance of FTC. He discussed the claims process, which is an area that CAFII's members are always trying to improve. Customers have complained that claims take too long and require too much paperwork, particularly doctor's notes. AI could potentially help with this. S. Miller expressed some hesitancy around AI. She remarked how important it is to work with people since AI can be frustrating and unhelpful. CAFII agreed and elaborated that AI should be viewed as a tool rather than a replacement for human interaction.

At this point in the presentation, CAFII brought up complaints handling. K. Martin explained that all CAFII's members adhere to the FCAC's Financial Consumer Protection Framework and that the Fair Treatment of Customers (FTC) is a key priority. S. Miller commented that it is difficult to find consistency when it comes to defining terms like FTC. It is also hard to then ensure that all interpretations of these terms and subsequent claims resolutions are aligned. She noted that while the FCAC previously engaged with the Canadian Council of Insurance Regulators (CCIR), it has not done so recently. She said that though she would consider doing so again, it's difficult because it will be, essentially, data sharing without MOUs because those require cabinet approval.

While S. Miller did not explicitly use the word "harmonized," that was her point; the FCAC is aligned with promoting harmonization.

S. Miller explained that the FCAC does not handle complaints but rather focuses on complaints reporting; it looks at how *others* are handling and resolving complaints.

E. Dagenais asked, hypothetically, if someone was going into the bank with the aim to purchase insurance coverage, is the bank employee allowed to compare CPI to term life? K. Martin explained that, no, bank representatives are not licensed life insurance agents, and they cannot offer advice or produce a needs analysis. Instead, the bank employee can let the customer know that the insurance is available and can share relevant documents so the individual can investigate on their own. E. Dagenais asked, then, how does CPI versus term life compare in terms of premiums? CAFII's EOC Chair, Karyn Kasperski, responded that credit insurance is a group policy, whereas term life is priced with individual demographics. Group rates are often banded, which means one rate is paid out over the entire coverage period, whereas the term life rate changes every 5, 10, or 15 years, depending on the policy agreement. In that respect, they are not directly comparable products.

Near the end of the presentation, S. Miller asked if CAFII does any direct-to-consumer literacy work. K. Martin replied that, currently, CAFII does not, but it is something the Association could look into. She expressed that she doesn't like financial literacy as a term and prefers financial well-being and resiliency. She added that she believes that organizations have an obligation to properly inform their customers about their products. Thus, while she can acknowledge how research is great for sales, it needs to be used to help inform consumers. She concluded by suggesting that CAFII should consider participating in the FCAC's financial literacy strategy. EOC Member Andrea Stuska commented that perhaps there is a way for CAFII to leverage its partnerships to increase awareness, thereby increasing resilience.

FCAC's Frank Lofranco added that, across all products and services, financial knowledge is asymmetrical – institutions have significantly more knowledge than the consumers who need it. He explained organizations need to not only educate their consumers but do so in a timely manner so customers can make informed decisions. K. Kasperski asked F. Lofranco about this claim that FIs know their products and services more than their clients. She asked how the research was conducted, and whether it is publicly available. He explained that, internally, there has been a lot of conversation around this and that some research has been done on the topic. While he claimed that much has been published on the subject, he said that he would need to check and find the publications.

E. Dagenais asked if there were any efforts to eliminate inter-provincial trade barriers. K. Martin explained that this is an ongoing process. He added that he feels provincial regulators would say it is difficult because of the various legislative requirements that differ across the provinces. CAFII is facing this issue with the Insurance Council of British Columbia, which has proposed an unharmonized approach to training accreditation and corporate licenses versus individual licensing. K. Martin remarked that he is hopeful that some of the conversations he has been having with the Insurance Council are making an impact.

CCIR has had success with FTC across provinces where regulators are working together to achieve commonality. This has been a huge effort from both industry and regulators. Therefore, this kind of collaboration can work and has worked. This is not to say the provinces have never tried; they just

have their specific challenges. An example was how BC ended up using OSFI's form for incident reporting after much discussion occurred when they proposed having their own form.

At the end of the presentation, K. Martin discussed having a webinar with the FCAC in the Spring, to which S. Miller replied that they would be interested.

Before leaving, S. Miller made a few final remarks. She stated that when it is boiled down to FTC, there is so much commonality. This is why collaboration is so important. She mentioned the social policy coming out of Quebec, which tends to be very strong and feels that when a province comes out with a strong sensible policy, the other provinces should try to align. She feels a lot of legislative reforms may occur over the coming years. S. Miller also commented on the importance of keeping consumers informed because there is a huge amount of information available yet unknown. This is why FIs should use plain and impactful language and engage in efforts like journey mapping to capture relevance.

At the end of the meeting, there was some mingling and informal discussion.

After the meeting with the FCAC, the CAFII team went for lunch. The team then headed to the Federal Department of Finance's offices for the next meeting of the day.

Summary of Meeting with the Federal Department of Finance

In attendance, both in person and virtually, from the Federal Department of Finance were:

- Mark Radley – *Director, Consumer Affairs(in-person)*
- Judith Hamel – *Director General, Finance Services Division, Finance Sector Policy Branch*
- Anne Loosen – *Senior Project Leader and Economist (in-person)*
- Michael Chan – *Senior Advisor*
- Nathalie Chevassu – *Economist*

Due to extenuating circumstances, the otherwise 90-minute meeting had to be cut short (60 minutes instead). It is worth noting that Prime Minister Mark Carney had just announced a new cabinet on March 14, 2025, and a new Minister of Finance (François-Philippe Champagne) had just been announced, which might have prompted the need to shorten the meeting.

The meeting began with round-table introductions, after which CAFII's Executive Director, Keith Martin, started his presentation. Unlike the meeting with the FCAC, there were very few questions during K. Martin's presentation. Once he concluded, K. Martin opened the floor for comments and questions. Mark Radley commented that consumer-driven banking is a big priority for the financial sector's team and that they are currently working on the next steps.

CAFII's EOC Chair, Karyn Kasperski, mentioned the Federal Department's decision not to include insurance in the criminal rate of interest. She thanked them for this decision and for being so willing to work with CAFII on the issue. M. Radley remarked that the Department has not seen or heard of any issues from consumer groups regarding the criminal rates of interest and credit products. Therefore, it didn't seem necessary or sensical to include them.

M. Radley explained to CAFII that, while it is a transitional time at the Department, there is still a large focus on FTC and the improvement of consumer experiences. K. Kasperski brought up the

growing importance of collaboration and asked if the Department foresees any lessening of interprovincial trade barriers. She asked what, if anything, this industry can do to facilitate this. Harmonization was brought up as a starting point to facilitate this. K. Kasperski suggested thinking of removing trade barriers as a form of harmonization.

Judith Hamel mentioned that there is momentum within the Department to collaborate cross-provincially.

M. Radley asked, generally, in terms of consumer education and showcasing the value of credit protection products, what can FIs do before the point of sale? K. Martin explained that FIs can do very little. While there are tools available to consumers to facilitate research on these products, under the current regulatory framework, there is little that can be done in terms of advice or needs analysis. The banks can show the clients where to access this information, but given the restrictions, that is all they can do. They cannot compare term life to CPI, for example. M. Radley then asked if it is only at the point of sale that CPI can be purchased. The CAFII team explained that clients can buy CPI even after they have purchased a mortgage. Where it gets complicated, however, is in maintaining a degree of conversation with the client that facilitates the purchase because, usually, if a client does not buy at the time of purchase, they will not come back for it.

The Department asked if customers could insure their mortgage from a third party, to which CAFII explained that they could not. If someone gets a mortgage from TD, they cannot then go to RBC to insure that mortgage.

Michael Chan asked about CPI's payout and the reasons for someone being denied a claim. K. Martin explained suicide is one reason (after a certain period of time), however, M.A.I.D. is not included as suicide. The other major reason for claims denial is a false answer to underwriting questions. However, with a 95% mortgage life claims payout, K. Martin said that the great majority of claims are paid.

As the meeting concluded, Anne Loosen asked if CAFII could send her the presentation.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(d)

Strategic and Regulatory Matters – Update on Discussions with the Insurance Council of BC on the Accreditation of Training Materials for Representatives Operating Under a Corporate License (Restricted Insurance Agency Regime)

Purpose of this Agenda Item—Update

To update the Board on the discussions with the Insurance Council of BC on the Accreditation of Training Materials for Representatives Operating Under a Corporate License (Restricted Insurance Agency Regime).

Background Information

CAFII Executive Director Keith Martin will update the Board on CAFII's discussions with the Insurance Council of BC on the Accreditation of Training Materials for Representatives Operating Under a Corporate License (Restricted Insurance Agency Regime). CAFII and a team of member volunteers met with the Insurance Council on March 24, 2025, to discuss the proposed changes to the accreditation training materials required for representatives operating under a corporate license within BC's RIA regime. The meeting was not very productive; the Insurance Council participants seemed fairly unreceptive to CAFII's observations and suggestions. After the meeting, it was agreed amongst CAFII members that a working group should be created to tackle this issue.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

Two (2) attachments.

Insurance Council

BRITISH COLUMBIA

Restricted Insurance Licence Accreditation

February 2025

Jerlyne Nathan, Manager Licensing

Galen Aker, Stakeholder Engagement Specialist



Agenda

- Status update
- Process overview
 - Application
 - Fees
 - Evaluation
 - Assessment
 - Decision
- Next steps



Current Status

- Accreditation outreach
 - Education resources available prior to accepting licence applications.
- Industry outreach pending





Education Program Accreditation Process

Four Stages of the Accreditation Process:

1. Application
2. Evaluation
3. Decision
4. Reassessment

Accreditation Process: Application

- Open to third-party course providers, insurers, and agencies.
- Will collect information about course providers, course materials, and course facilitators/instructors.
- Supplemented with a guidebook.



Accreditation Process: Application Fee

- Fee based on costs to evaluate (staff/committee review time)
- Final amount to be determined



Accreditation Process: Evaluation

Course Content Assessment

- Knowledge of basic insurance concepts and terminology
- Insurance products and services
- Product sales, processing, and servicing
- Legal and regulatory requirements affecting sales and processing
- Professional conduct and ethics
- Errors and omissions
- Information management

Course Provider Assessment

- Program management, resources, and delivery
- Education planning, learning strategies, interests, and rights
- Quality improvement and innovation
- Certification – learner's attainment of competence
- Educational course components

Accreditation Process: Evaluation

- Completion of required documents.
 - Staff will advise and coordinate to ensure completion of application package.
- Evaluation of course content based on Restricted Insurance Agency Performance Requirements.
 - Most recent version incorporates industry feedback.
 - Forms the basis for curriculum design.
 - Will be used as framework to evaluate and accredit course material.



Accreditation Process: Decision

- Decision provided by Accreditation Committee.
- Approval and receive accreditation.
- Decline:
 - Will advise areas of improvement to meet program standards.
 - Reapplication required.

Accreditation Process: Reassessment

- Course materials will be reassessed after four years.
- Ensure course material remains current and relevant.



Next steps

- Have not been provided official date when regulations will be published.
- Goal is to be prepared to start receiving accreditation applications four (4) months after regulation.
- We want training available to businesses prior to accepting licence applications.
- Continued communications when information is available.

Thank you

Insurance Council
BRITISH COLUMBIA



12

From: Keith Martin <Keith.Martin@cafii.com>

Sent: Tuesday, March 25, 2025 1:30 PM

To: Kasperski, Karyn <karyn.kasperski@rbc.com>; Burns, John <John.Burns@securiancanada.ca>; Saburi, Rebecca <rebecca.saburi@bmo.com>; Sara Belanger <Sara.Belanger@assurant.com>; 'Rob Dobbins' <rob.dobbins@assurant.com>; Dowe, Shannon (She/Her/Hers) <shannon.dowe@rbc.com>; Sharon Murrell-Foster <Sharon_Murrell@manulife.ca>; Andrea Stuska (<andrea.stuska@td.com> <andrea.stuska@td.com>); Suzie Blanchard <Suzanne_blanchard@manulife.ca>; Thakkar, Kiran <Kiran.Thakkar@canadalife.com>; Peter Thorn <peter.thorn@td.com>; Sean Kradjian <sean.kradjian@scotiabank.com>; Bradley Kuiper <bradley.kuiper@scotiabank.com>; Louis-Philippe Morisset <louis-philippe.morisset@dsf.ca>; Zulak, Matt <matt.zulak@rbc.com>; Khimjee, Shahnoor <Shahnoor.Khimjee@td.com>; Kirsh, Wayne <wayne.kirsh@scotiabank.com>; Ewen, Dallas <dallas.ewen@canadalife.com>; Goulamhousen, Nichad <Nichad.Goulamhousen@securiancanada.ca>; Janet Pacini Thibodeau <Janet_Pacini_Thibodeau@manulife.ca>; Johnson, Petrina (Trina) <petrina.johnson@cibc.com>; Jasarón, Gaël <gael.jasaron@bnc.ca>; Ashraf, Samina S (she/her/hers) <Samina.Ashraf@td.com>; Baig, Afzal <afzal.baig@chubb.com>; Catherine Latulippe <Catherine.Latulippe@ctfs.com>; Deirdre Kennedy <deirdre.kennedy@cumis.com>; 'Coleman, Fay' <fay.coleman@td.com>; Dybel, Joanna <Joanna.Dybel@scotiabank.com>

Cc: Lara Doig <Lara.Doig@cafii.com>; Robyn Jennings <Robyn.Jennings@cafii.com>

Subject: CAFII: Invitation to Join a Working Group on the Performance Indicators and the Accreditation Process for the Insurance Council of BC

[External]/[Externe]

Hello CAFII Member,

You are receiving this note because you attended the March 24, 2025 meeting with the Insurance Council of BC on accreditation of training materials in their RIA regime.

Both the performance indicators, which include requirements that are more aligned with what a licensed individual would be expected to know, and the accreditation process, are not aligned with what other RIA regimes require and would be an extra burden for CAFII's members. I have been asked to strike a Working Group on how we can best respond to the Insurance Council of BC, and what should be our next steps.

At the upcoming March 25, 2025 meeting of the EOC today we will invite EOC members who did not attend this meeting to let us know if they are interested in being on this Working Group. Meantime, if you are interested in participating, please let me know via an email and I will be sure to include you in the Working Group.

A meeting will be set up in the near future at which we will begin discussion of how to move forward on this file.

Thanks,

--Keith

Keith Martin

Executive Director / Directeur général

Canadian Association of Financial Institutions in Insurance
L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

www.cafii.com

[Visit the CAFII LinkedIn Page](#)



Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(e)

Strategic and Regulatory Matters – Update on the Plans around 2025 Regulatory Tours to All Provinces in Canada

Purpose of this Agenda Item—Update

To update the Board on the plans around CAFII's 2025 Regulatory Tours to all Provinces in Canada.

Background Information

CAFII's Senior Operations Manager Lara Doig will update the Board on the plans around CAFII's 2025 Regulatory Tours to all Provinces in Canada. Thus far, phase one of the Atlantic portion of the Regulatory Tour has been confirmed: NB and PEI from May 11-13, 2025. Because the CLHIA will be hosting their conference in PEI, CAFII's attendees (Executive Director, Keith Martin, and CAFII's Research Analyst, Robyn Jennings) will stay in Charlottetown until April 16th to attend the conference.

Schedule

- Sunday, May 11: Fly to Fredericton, NB and stay overnight.
- Monday, May 12: Meet with FCNB in 90-minute meeting from 10:00am -11.30am.
- Monday, May 12: CAFII entourage lunch 12:00 pm
- Monday, May 12: Drive from Fredericton, NB to Charlottetown, PEI (3.5-hour drive) and spend the night. A dinner will be arranged.
- Tuesday, May 13: Meet with PEI regulators from 10:00-11.30am. A lunch and dinner will be arranged.
- Wednesday, May 14-16: CLHIA conference.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

Two (2) attachments.

**Itinerary and Meetings Schedule for CAFII Spring 2025 Atlantic Canada Insurance
Regulators and Policy-Makers Tour: Phase 1 – New Brunswick and Prince Edward
Island**

CAFII will be engaging in 2025 Regulatory Tours, starting with a visit to regulators in New Brunswick (FCBN) and PEI, in conjunction with the CLHIA Compliance and Consumer Complaints Conference to be held in Charlottetown, PEI from Wednesday, May 14 to Friday, May 16.

https://www.clhia.ca/web/CLHIA_LP4W_LND_Webstation.nsf/page/AD9B1618FBC1C2E5852584EA006C7099

Current participants:

From CAFII:

Keith Martin, Executive Director

Robyn Jennings, Research Analyst

CAFII has asked for confirmation of member volunteers who wish to join

Our plan is as follows:

Sunday, May 11: fly to Fredericton, NB and stay overnight.

Monday, May 12: Meet with FCNB in 90-minute meeting from 10:00am -11.30am.

Monday, May 12: CAFII entourage lunch 12:00 pm

Monday, May 12: Drive from Fredericton, NB to Charlottetown, PEI (3.5-hour drive) and spend the night. A dinner will be arranged.

Tuesday, May 13: Meet with PEI regulators from 10:00-11.30am. A lunch and dinner will be arranged.

Wednesday, May 14-16: CLHIA conference.

Travel:

FLIGHTS: Toronto, ON to Fredericton, NB				
Air Line	Airport	Date	Departure	Arrival
Air Canada (non-stop)	Toronto Pearson YYZ	05-11-2025	8:15 am EST	11:05 am AST
Air Canada (non-stop)	Toronto Pearson YYZ	05-11-2025	2:45 pm EST	5:36 pm AST
Air Canada (1 stop)	Toronto Pearson YYZ	05-11-2025	9:00 am EST	3:07 pm AST
Porter (non-stop)	Toronto City Airport YTZ	05-11-2025	5:45 pm EST	8:42 pm AST

Air Canada Discount Code for CHLIA Conference: T3YHFW41

FLIGHTS: Charlottetown, PEI to Toronto, ON				
Departure dates <i>not attending</i> CLHIA Complaints and Compliance Conference				
Air Line	Airport	Date	Departure	Arrival
Air Canada (non-stop)	Charlottetown (YYG)	05-13-2025	12:25 pm AST	13:48 pm EST
Air Canada (one stop)	Charlottetown (YYG)	05-13-2025	4:25 pm AST	7:48 pm EST
Porter (1 stop)	Charlottetown (YYG)	05-14-2025	6:40 am AST	9:38 am EST

FLIGHTS: Charlottetown, PEI to Toronto, ON				
Departure dates <i>attending</i> CLHIA Complaints and Compliance Conference				
Air Line	Airport	Date	Departure	Arrival
Air Canada (non-stop)	Charlottetown (YYG)	05-16-2025	12:25 pm AST	1:48 pm EST
Air Canada (1 stop)	Charlottetown (YYG)	05-16-2025	4:25 pm AST	7:48 pm EST
Porter (1 stop)	Charlottetown (YYG)	05-16-2025	1:20 pm AST	4:28 pm EST

Addresses to Note:

Fredericton Regulatory Meeting:

225 King Street Unit 200, Fredericton, NB

Charlottetown Regulatory Meeting:

Location TBD

Accommodation Fredericton, NB:

Hotels Fredericton, NB	
Hotel Name	Link
Hilton Garden Inn Fredericton (Recommended)	https://www.hilton.com/en/hotels/yfcnwgi-hilton-garden-inn-fredericton/?SEO_id=GMB-AMER-GI-YFCNWGI&y_source=1_OTk00TYwMy03MTUtbG9jYXRpb24ud2Vic2l0ZQ%3D%3D
Crowne Plaza Fredericton – (Recommended)	https://www.ihg.com/crowneplaza/hotels/us/en/fredericton/yfcqs/hoteldetail?cm_mmc=GoogleMaps- -CP- -CA- -YFCQS
Delta Hotels Fredericton	https://www.marriott.com/en-us/hotels/yfcdf-delta-hotels-fredericton/overview/?scid=f2ae0541-1279-4f24-b197-a979c79310b0

Accommodation Charlottetown, PEI:

Hotels Charlottetown, PEI	
Hotel Name	Link
Delta Hotel Prince Edward (Discounted rates for those attending the CLHIA Conference)	https://www.marriott.com/en-us/hotels/yygdp-delta-hotels-prince-edward/overview/

Dining:

Restaurants Fredericton, NB	
Name	Link
Rustico Gastropub Fredericton	https://rusticofredericton.com/
540 Kitchen and Bar	https://www.540kitchenandbar.com/about

Restaurants Charlottetown, PEI	
Name	Link
Cocotte Bistro	https://cocottebistro.com/
Browns Social House	https://www.brownsocialhouse.com/centretown
Thali	https://thaliottawa.ca/
Clahddagh Oyster House	https://claddaghoysterhouse.com/
John Brown Grille	https://johnbrowngrille.com/

Piatto Pizzeria Enoteca	https://www.piattopizzeria.com/featured-locations/charlottetown
Merchant Man Seafood House	https://merchantman.ca/
Leonhard's Cafe and Restaurant	https://leonhards.ca/
Slaymaker	https://slaymaker.ca/

If you are interested in attending the regulatory tour, please let Lara Doig know as soon as possible. The two meetings will include a virtual meeting component. These meetings will be put in all EOC members' calendars for that reason, but if you do not plan to attend in-person or virtually please delete the invite.

**Itinerary and Meetings Schedule for CAFII Spring 2025 Atlantic Canada Insurance
Regulators and Policy-Makers Tour: Phase 2 – Nova Scotia and Newfoundland and
Labrador**

CAFII will be engaging in 2025 Regulatory Tours, with a visit to Regulators in Halifax, Nova Scotia and St. John's, Newfoundland and Labrador.

Current participants:

From CAFII:

Keith Martin, Executive Director

Robyn Jennings, Research Analyst

EOC Members:

Karyn Kasperski, RBC Insurance

John Burns, Securian Canada

CAFII has asked for confirmation of member volunteers who wish to join

Our plan is as follows:

- Fly to Halifax evening of Wednesday June 11th
- Meeting with Nova Scotia Regulators Thursday June 12th 10:00 – 11:30 am AST
- CAFII lunch Thursday June 12th 12:00 – 1:30 pm AST
- Fly to St. John's Newfoundland and Labrador afternoon/evening Thursday June 12th
- Meeting with Newfoundland and Labrador Regulators Friday June 13th 10:00 – 11:30 am AST
- CAFII lunch Friday June 13th 12:00 – 1:30 pm AST
- Fly to Toronto afternoon/evening of Friday June 13th

Travel:

FLIGHTS: Toronto, ON to Halifax, NS				
Air Line	Airport	Date	Departure	Arrival
West Jet (non-stop)	Toronto Pearson YYZ	06-11-2025	7:30 pm EST	10:40 pm AST
Air Canada (non-stop)	Toronto Pearson YYZ	06-11-2025	2:00 pm EST	5:09 pm AST
Air Canada (non-stop)	Toronto Pearson YYZ	06-11-2025	4:30 pm EST	7:39 pm AST
Air Canada (non-Stop)	Toronto Pearson YYZ	06-11-2025	6:10 pm EST	9:19 pm AST
Porter (non-stop)	Toronto Pearson YYZ	06-11-2025	5:35 pm EST	8:43 pm AST
Porter (non-stop)	Toronto Pearson YYZ	06-11-2025	9:15 pm EST	12:23 am AST

FLIGHTS: Halifax, NS to St. John's NFL				
Air Line	Airport	Date	Departure	Arrival
Air Canada (non-stop)	Halifax YHZ	06-12-2025	4:10 pm AST	6:34 pm AST
Air Canada (non-stop)	Halifax YHZ	06-12-2025	8:00 pm AST	10:24 pm AST
Porter (non-stop)	Halifax YHZ	06-12-2025	2:40 pm AST	5:00 pm AST
Porter (non-stop)	Halifax YHZ	06-12-2025	7:30 pm AST	9:51 pm AST

FLIGHTS: St. John's NFL to Toronto, ON				
Air Line	Airport	Date	Departure	Arrival
West Jet (non-stop)	St. John's YYT	06-13-2025	3:00 pm AST	5:10 pm EST
Air Canada (non-stop)	St. John's YYT	06-13-2025	5:35 pm AST	7:42 pm EST
Air Canada (one-stop)	St. John's YYT	06-13-2025	6:10 pm AST	9:39 pm EST

Addresses to Note:

Halifax Regulatory Meeting:

1723 Hollis Street, 5th Floor

St. John's Regulatory Meeting:

Confederation Building, Visitors Entrance, 2nd Floor West Block, Digital Government and Service NL

Accommodation Halifax, NS:

Hotels Halifax, NS	
Hotel Name	Link
The Hollis Halifax (Recommended)	The Hollis Halifax
The Sutton Place Hotel Halifax (Alternative)	The Sutton Place
The Prince George Hotel (Alternative)	The Prince George Hotel
Halifax Marriott Harbourfront Hotel (Alternative)	Halifax Marriott Harbourfront Hotel

Accommodation St. John's, NFL:

Hotels St. John's, NFL	
Hotel Name	Link
Alt Hotel St. John's (Recommended)	Alt Hotel St. John's
Courtyard St. John's (Alternative)	Courtyard St. John's
Sheraton Hotel Newfoundland (Alternative)	Sheraton Hotel Newfoundland
Double Tree by Hilton St. John's Harbourview (Alternative)	Double Tree By Hilton

Dining:

Restaurants Halifax, NS	
Name	Link
Waterfront Warehouse	Waterfront Warehouse
Amano	Ristorante Amano
Cablewharf	Cablewharf
The Mercantile Social	The Mercantile Social
Water Polo	Water Polo
Cabin Coffee	Cabin Coffee

Restaurants St. John's, NFL	
Name	Link
Blue on Water	Blue on Water
The Keg Steakhouse + Bar	The Keg Steakhouse + Bar
Oliver's Restaurant	Oliver's Restaurant
Bernard Stanley Gastropub	Bernard Stanley Gastropub
YellowBelly Brewery	YellowBelly Brewery

If you are interested in attending the Regulatory tour, please let Lara Doig know as soon as possible. The two meetings will include a virtual meeting component. These meetings will be put in all EOC members' calendars for that reason, but if you do not plan to attend in-person or virtually please delete the invite.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(f)

Strategic and Regulatory Matters – Plans For Annual Members Luncheon on May 22/25 with a Panel of Three Lawyers: Stuart Carruthers (Stikeman Elliott); Jill McCutcheon (Torys); Koker Christensen (Fasken)

Purpose of this Agenda Item—Update

To update the Board on the plans for CAFII's Annual Members Luncheon on May 22/25 with a panel of three Lawyers: Stuart Carruthers (Stikeman Elliott); Jill McCutcheon (Torys); Koker Christensen (Fasken).

Background Information

CAFII's Senior Operations Manager, Lara Doig, will update the Board on the plans for CAFII's Annual Members Luncheon on May 22/25 with a panel of three Lawyers: Stuart Carruthers (Stikeman Elliott); Jill McCutcheon (Torys); and Koker Christensen (Fasken).

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

One (1) attachment.

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Reminder: You are receiving this email because you have expressed an interest in the Canadian Association of Financial Institutions in Insurance.

CAFII Annual Members and Associates Luncheon



Hello CAFII,

You're Invited!

You are cordially invited to attend CAFII's **2025 Annual Members and Associates Luncheon** on Thursday, May 22, 2025 at St. James Cathedral Centre Event Venue in Toronto.



CAFII 2025 Annual Members and Associates Luncheon

This *by-personal-invitation-only* CAFII event will take place at St. James Cathedral Centre Event Venue, 65 Church St. in downtown Toronto (short walk from the King TTC station).

Join us for a benefits-packed 2.5 hours of networking with fellow CAFII Member and Associate representatives; a delicious buffet lunch; and a panel discussion with Stikeman Elliott Partner Stuart Carruthers, Torys LLP Partner Jill McCutcheon and Fasken Partner Koker Christensen, moderated by CAFII Executive Director Keith Martin.

The Changing Insurance Legal and Regulatory Environment: Challenges, Risks, and Opportunities



Stuart Carruthers, Partner, Stikeman Elliott

Please [click here](#) for capsule biography.



Jill McCutcheon, Partner, Torys LLP

Please [click here](#) for capsule biography.



Koker Christensen, Partner, Fasken

Please [click here](#) for capsule biography.

CAFII is pleased to present a stellar panel of three leading insurance law and regulatory regime experts, who will engage in a Fireside Chat with CAFII Executive Director Keith Martin on changes, trends, and issues in the global and domestic insurance regulatory environments, with a particular focus on credit protection insurance, travel insurance, and life and health insurance more broadly.

When: Thursday, May 22, 2025 from 11:45 am to 2:15 pm

Location: St James Cathedral Centre Event Venue
(65 Church St, Toronto, ON M5C 2E9)

CAFII 2025 Annual Members and Associates Luncheon: Event Overview

11:45 a.m. to 12:15 p.m.: Arrival & Pre-Lunch Networking

Check in at Registration; Network with fellow CAFII Member and Associate representatives before lunch

12:15 to 1:00 p.m.: Buffet Lunch and At-Table Conversation/Networking

1:00 to 1:10 p.m.: Coffee/Tea and Dessert (placed on tables); and At-Table Conversation/Networking continues

1:10 to 1:15 p.m.: Welcome Remarks and Introduction of VIP Guests and Expert Panelists

1:15 to 2:00 p.m.: Fireside Chat, concluding with Q&A Session with Audience Members

2:00 to 2:15 p.m.: Post-Event Networking

2:15 p.m.: Event concludes

For further information or assistance, please email Winnie Chan at events@cafii.com

We look forward to welcoming you to this 2025 CAFII event!

Sincerely,

Keith Martin
Executive Director

Canadian Association of Financial
Institutions in Insurance
T: (647) 460-7725
Office: (416) 494-9224
keith.martin@cafii.com
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Canadian Association of Financial Institutions in Insurance | 20 Richmond Street East, Suite
600-25 | Toronto, ON M5C 2R9 CA

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Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(g)

Strategic and Regulatory Initiatives – Plans for Immediately Ensuing April 8/25 Reception Event with Tolga Yalkin, CEO of BCFSa, as Guest Speaker

Purpose of this Agenda Item—Update

To update the Board on plans for an immediately ensuing April 8/25 reception event with Tolga Yalkin, CEO of BCFSa, as the guest speaker.

Background Information

CAFII's Senior Operations Manager, Lara Doig, will update the Board on the plans for an immediately ensuing April 8/25 reception event after the April Board meeting, at which Tolga Yalkin, CEO of BCFSa, will speak.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

One (1) attachment.

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Reminder: You are receiving this email because you have expressed an interest in the Canadian Association of Financial Institutions in Insurance.



Making Insurance Simple and Accessible for Canadians
Rendre l'assurance simple et accessible pour les Canadiens

You're Invited!

You are cordially invited to attend CAFII's Reception event on Tuesday, April 8, 2025, hosted by TD Insurance.

Tolga Yalkin, the new British Columbia Financial Services Authority (BCFSA) Chief Executive Officer and Chief Statutory Officer, will be CAFII's keynote speaker at our reception on April 8, 2025, focusing on his priorities and vision for BCFSA and the key challenges and opportunities facing the regulator in the rapidly-evolving insurance sector.

When: Tuesday, April 8, 2025 from 5:30 to 7:30 p.m.

Location: TD Terrace Conference Centre,
160 Front Street West - 4th Floor, Toronto, ON, M5J 2L6



GUEST SPEAKER



Tolga Yalkin

*Chief Executive Officer
& Chief Statutory Officer,
British Columbia Financial Services Authority
(BCFSA)*

Tolga is the Chief Executive Officer (CEO) of BC Financial Services Authority (BCFSA), where he serves as BC's Superintendent of Financial Institutions, Superintendent of Pensions, Superintendent of Real Estate, Registrar of Mortgage Brokers as well as Chief Executive Officer of the Credit Union Deposit Insurance Corporation (CUDIC).

With over 13 years of experience in financial regulation, crisis management, compliance, and innovation, Tolga has built a strong reputation as a leader in regulatory oversight. Before joining BCFSA, he oversaw financial institutions at the Office of the Superintendent of Financial Institutions (OSFI), playing a key role in safeguarding Canada's financial system and overseeing regulatory risks.

Tolga's career is defined by his strategic leadership in high-stakes environments, showcasing his expertise in regulatory frameworks, public service, and economic and policy analysis. He has held senior roles in the federal government, including Assistant Deputy Minister of the COVID-19 Task Force at Health Canada, Assistant Deputy Minister at the Treasury Board of Canada Secretariat, and Director General of Health Canada's Consumer and Hazardous Product Safety Directorate.

Tolga holds bachelor's degrees in law and commerce and two master's degrees in law from the University of Oxford.



Reception: Event Overview

5:30 to 6:00 Cocktails and Conversation

Networking and socializing, with beer, wine, soft drinks, snacks and hors d'oeuvres available

6:00 to 6:45 Presentation by Tolga Yalkin

6:45 to 7:30 Reception Continues

Further networking and socializing continues

Registration is required to attend. Please RSVP to this invitation using the "Register Here" link below by 4:00 p.m. on Tuesday, April 1, 2025.

[Register Here](#)

For further information or assistance, please email Winnie Chan at events@cafii.com

We look forward to welcoming you to this 2025 CAFII event!

Sincerely,

Keith Martin
Executive Director
Canadian Association of Financial
Institutions in Insurance
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Office: (416) 494-9224
keith.martin@cafii.com
www.cafii.com

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Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(h)

Strategic and Regulatory Initiatives – Proposed Letter and Outreach to New FSRA CEO Dexter John

Purpose of this Agenda Item—Update

To update the Board on the proposed letter and outreach to FSRA's new CEO, Dexter John.

Background Information

CAFII's Executive Director, Keith Martin, will update the Board on the proposal to draft a letter for an outreach meeting to FSRA's new CEO, Dexter John.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 4(i)

Strategic and Regulatory Initiatives – Open Discussion on the Implications of Tariffs and other initiatives from the United States on CPI and the Business Environment more Generally

Purpose of this Agenda Item—Discussion

To discuss with the Board the implications of tariffs and other initiatives from the United States on CPI and the business environment more generally.

Background Information

CAFII's Board Chair Val Gillis will bring up for discussion with the Board the implications of tariffs and other initiatives from the United States on CPI and the business environment more generally.

Recommendation / Direction Sought—Discussion

This is a discussion item.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 5(a)
Governance – Launch of the New CAFII Intranet

Purpose of this Agenda Item—Update

To update the Board on the launch of the new CAFII intranet.

Background Information

CAFII's Executive Director, Keith Martin, will update the Board on the launch of the new CAFII intranet.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

One (1) attachment.

From: Keith Martin

Sent: March 3, 2025 9:29 AM

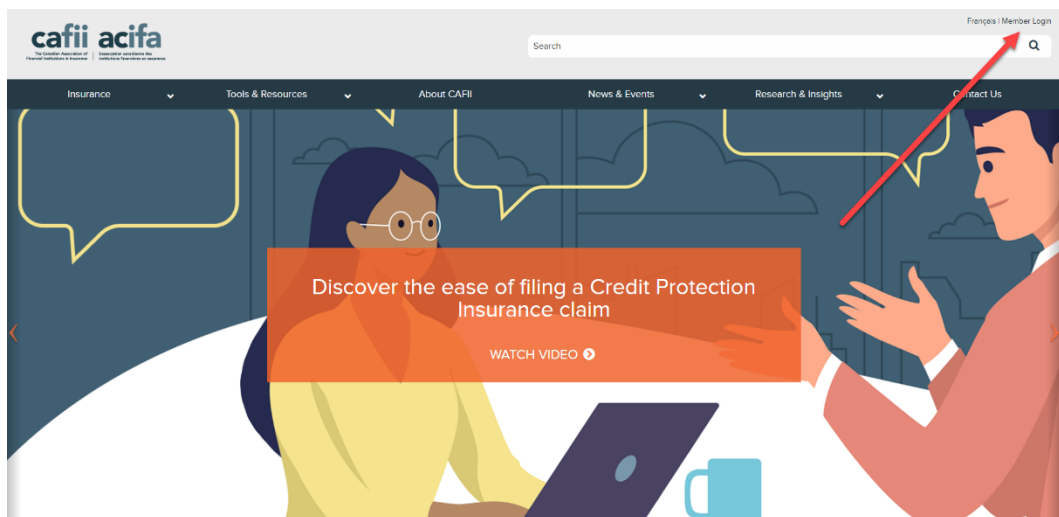
Subject: CAFII's New Member-Only, Password-Protected Intranet is Launched!

Hello CAFII member,

I am pleased to report that the new CAFII member-only, password protected Intranet is launched!

This was a major initiative that we have been working on for the past six months. Because the site is intended to be user-friendly, easy-to-navigate, and intuitive, I am not going to provide any training or instructions—you should find it easy to understand what the site offers by just visiting it.

That said, the most challenging part you will encounter on the website is to get your password set up, which will occur the first time you enter the site. You can always gain entry in future by going to www.cafii.com and clicking on the top right hand “Member Login” (see below).



However, to bypass some steps, **the first time you log in I suggest you use the link below.**

<https://members.cafii.com/my-account/>

You will be brought to a password reset screen.



Please enter your work email and click on “Reset password.” Instructions will be sent to your email address (please check your junk folder if you do not see the email). Upon successfully resetting your password, you will gain entry to the site.

While the content, including meeting packages for EOC and Board meetings, should be intuitive, I do want to mention that there is a new section “Regulatory Submissions” which includes all regulatory submissions CAFII has made, which is completely searchable with filters including the option of choosing a topic of interest which will provide a list of all submissions made on that topic.

Please let us know of any feedback you may have on the website.

If you have any difficulty gaining entry, please email Troy Woodland and copy me.

Troy Woodland Troy.Woodland@cafii.com

(If you have a colleague who would like to provide access to the site who is not currently on our list of active members, they can “Register” on the site and Troy Woodland will confirm that they are from a member, and will approve their access.)

Thank you,

--Keith

Keith Martin

Executive Director / Directeur général

Canadian Association of Financial Institutions in Insurance

L'association canadienne des institutions financières en assurance

keith.martin@cafii.com

T: 647.460.7725

www.cafii.com

[Visit the CAFII LinkedIn Page](#)



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Rendre l'assurance simple et accessible pour les Canadiens

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 5(b)
Governance – Feedback from Robyn Jennings on 1-on-1 EOC Meetings

Purpose of this Agenda Item—Update

To update the Board on the feedback received from Robyn Jennings' 1-on-1 EOC meetings.

Background Information

CAFII's Research Analyst, Robyn Jennings, will update the Board on the feedback she has received from EOC members over the last six months while conducting one-on-one EOC meetings.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting April 08, 2025—Agenda Item 5(c)

Governance – Confirmation of Completion of the 2024 Annual Appraisal of CAFII Executive Director

Purpose of this Agenda Item—Update

To update the Board on the confirmation of the completion of the 2024 Annual Appraisal of CAFII's Executive Director.

Background Information

CAFII's Chair, Karyn Kasperski, will update the Board on the confirmation of the completion of the 2024 Annual Appraisal of CAFII's Executive Director.

Recommendation / Direction Sought—Update

This is an update item.

Attachments Included with this Agenda Item

No attachments.

Briefing Note

CAFII BOD Meeting December 03, 2024—Agenda Item 6(a-d) Read Only Items

Purpose of this Agenda Item—Read Only

To provide documentation for the Board to review, which does not require updates, discussion, or decision-making unless requested by a Board member.

Background Information

To provide documentation for the Board to review, which does not require updates, discussion, or decision-making, unless requested by a Board member.

- a. Two New CAFII Associates: Jennings Consulting; Global Excel Management
- b. Publication of New CAFII Video on LIMRA Research and CPI
- c. Final Internal-Only Detailed Word Document from Deloitte on Technology Trends and CPI
- d. Letter to the AMF on its Interpretation of Statistics around CPI
- e. AMF Operational Resilience Document, January 23, 2025
- f. Managing Matters Acquisition by Association Headquarters
- g. Joint CAFII, CLHIA, THIA Meeting with BCFSa on Outsourcing and “Adjusting” (February 11, 2025)
- h. BCFSa Decision Not to Proceed with the Requirement for Life Insurance “Adjusters” to be Individually Licensed
- i. Request for CAFII to Offer Input in a Virtual Meeting on Alberta Insurance Council Strategic Plan 2025-2028
- j. April 1/25 Webinar on Results of the Deloitte Research on Technology Trends and CPI
- k. April 2/25 Public Release of the CAFII Research Project with Deloitte
- l. Update on the Enhanced RSM Canada Benchmarking Study (Q1 2025)

Recommendation / Direction Sought—Read Only

No action required.

Attachments Included with this Agenda Item

No attachments.

Link: *CAFII April 8/25 BOD Meeting Read-Only Items – Google Drive Document Repository*

This link includes documents for:

- [1 of 2 - Two New CAFII Associates: Global Excel Management](#)
- [2 of 2 - Two New CAFII Associates: Jennings Consulting](#)

- [Publication of New CAFII Video on LIMRA Research and CPI](#)
- [Final Internal-Only Detailed Word Document from Deloitte on Technology Trends and CPI](#)
- [1 of 3 - Letter to the AMF on its Interpretation of Statistics around CPI](#)
- [2 of 3 - Letter to the AMF on its Interpretation of Statistics around CPI](#)
- [3 of 3 - Letter to the AMF on its Interpretation of Statistics around CPI](#)
- [1 of 2 - AMF Operational Resilience Document, January 23, 2025 \(ENG\)](#)
- [2 of 2 - AMF Operational Resilience Document, January 23, 2025 \(FR\)](#)
- [Managing Matters Acquisition by Association Headquarters](#)
- [Joint CAFII, CLHIA, THIA Meeting with BCFSa on Outsourcing and “Adjusting” \(February 11, 2025\)](#)
- [1 of 3 - BCFSa Decision Not to Proceed with the Requirement for Life Insurance “Adjusters” to be Individually Licensed](#)
- [2 of 3 - BCFSa Decision Not to Proceed with the Requirement for Life Insurance “Adjusters” to be Individually Licensed](#)
- [3 of 3 - BCFSa Decision Not to Proceed with the Requirement for Life Insurance “Adjusters” to be Individually Licensed](#)
- [Request for CAFII to Offer Input in a Virtual Meeting on Alberta Insurance Council Strategic Plan 2025-2028](#)
- [April 1/25 Webinar on Results of the Deloitte Research on Technology Trends and CPI](#)
- [1 of 4 - April 2/25 Public Release of the CAFII Research Project with Deloitte](#)
- [2 of 4 - April 2/25 Public Release of the CAFII Research Project with Deloitte](#)
- [3 of 4 - April 2/25 Public Release of the CAFII Research Project with Deloitte](#)
- [4 of 4 - April 2/25 Public Release of the CAFII Research Project with Deloitte](#)
- [Update on the Enhanced RSM Canada Benchmarking Study \(Q1 2025\)](#)