CADRI
CANADIAN ASSOCIATION OF DIRECT RELATIONSHIP INSURERS

31 August 2018

Mr. Ron Fullan
Chair, Canadian Insurance Services Regulatory Organizations (CISRO)
5160 Yonge St
North York, ON M2N 6L9
cisro-ocra@fsco.gov.on.ca

Dear Mr. Fullan,

Re: CISRO General Insurance Licensing Qualification Review (GILQR)

Introduction

The Canadian Association of Direct Relationship Insurers (CADRI) is the voice of insurance enterprises that offer automobile, home and commercial insurance directly to Canadians. We advocate for flexible and evolving regulatory and legislative frameworks governing automobile, property and commercial insurance to enable product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI appreciates the opportunity to contribute to CISRO's review of qualifications for general insurance agents. As we discussed with the GILQR Committee at a meeting earlier this year in Toronto, we have in the past and continue to call for a wider review of agent licence categories. In our experience, the varying levels of licences among the provinces and territories add administrative layers without necessarily contributing significantly to enhanced consumer protection.

We would welcome consultations with the objective of a single set of licensing criteria and a single renewal for insurers who operate in more than one jurisdiction. We believe CISRO could take steps toward this goal by focusing on the common elements of a licence across jurisdictions. Once a satisfactory curriculum and regime is put in place, modules could be developed to accommodate jurisdictional specifics or depth of knowledge required for specialties, including commercial.

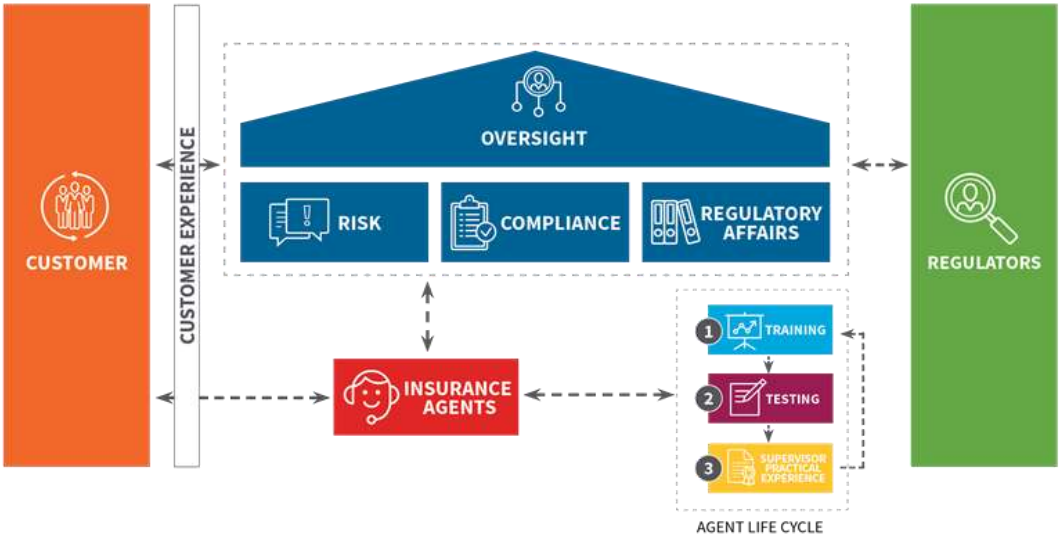
Value of the direct-relationship model

CADRI members have structured, tiered staffing models to ensure adequate supervision of all employees – regardless of their levels of experience. Prior to making contact with customers, agents undergo thorough background checks, and rigorous training to ensure compliance with regulations, company policies and delivery on customer service commitments. Thus, the very nature of direct-relationship insurers' corporate structures provides layers of internal controls such as regulatory compliance, risk mitigation, internal audits and the necessity to provide an excellent customer experience. In all, these ensure that licensed agents comply with regulatory frameworks and protect consumers' interests.

Figure 1. Value of the direct-relationship model

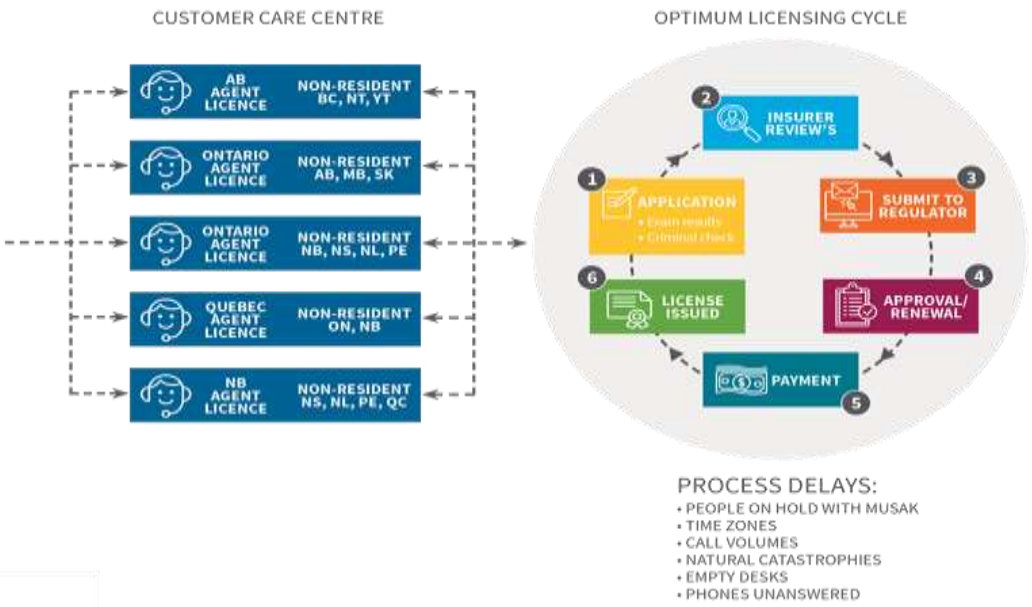


Figure 2. Ensuring Consumer Protection



Because a direct-insurer's agents frequently work onsite in customer care centres which serve several provinces, the current approach to licensing means an agent may need to secure a number of different provincial and territorial licences. If qualifications, applications for, or renewals of, any one of these licences is out of sync with the others, an agent may sit idle, unable to answer calls and serve customers as the inquiries coming in may be from any part of the country.

Figure 3. Impact of licensing process on customer experience



Reducing red-tape across Canada

The intricacy of the various provinces' approaches is set out in *Figure 4. Pan-Canadian Complexity.*

Figure 4. Pan-Canadian Complexity



	BC	AB	SK	MB	ON (FSCO)	ON (RIBO)	QC	PEI	NS	NL	NB	NU	NT	YT
LICENSING LEVELS	Three	Three	Three	Three	One	Four	One	One	Three	Three	Three	One	One	One
ONLINE APPLICATIONS	-	✓	✓	✓	✓	-	✓	-	-	-	✓	-	-	-
PAPER APPLICATIONS	✓	-	✓	-	-	✓	✓	✓	✓	✓	-	✓	✓	✓
INDIVIDUAL ADJUSTER LICENCING	-	✓	-	-	-	-	✓	✓	-	✓	✓	-	-	-
PROCESSING TIME	-	-	-	-	-	-	-	>30 days	-	>30 days	-	>30 days	>30 days	>30 days
PAYMENT OPTIONS	Cheque & Credit Card	Cheque & Credit Card	Cheque & Credit Card	Cheque	Cheque, Money Order, Credit Card	Cheque	Cheque & Credit Card	Cheque	Cheque & Credit Card	Cheque	Cheque & Credit Card	Cheque	Cheque	Cheque

* Levels are not harmonized between juridictions and equivalencies vary

In this context, CADRI recommends that CISRO's discussions and planning focus on changes to the educational curricula which would provide one base licence which would be recognized across Canada. Modules covering jurisdictional specifics, or deeper, specialty knowledge like commercial issues for instance, would be available for agents as required by their insurer employers.

Specific answers to CISRO's 10 questions are set out in Appendix 1.

Yours sincerely,



Alain Thibault
Chairman and CEO

cc: CADRI Board of Directors
CADRI Licensing Task Force
Anthonet Maramieri, CISRO GILQR Working Group Chair, amaramieri@abcouncil.ab.ca
Joanna Reading, Joanna.Reading@fsco.gov.on.ca

Encl.

Appendix 1

1. ***As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?***

Canada is a large country with world-renown geography. That said, insurance agents working for direct-relationship insurers provide similar service to customers whether they are situated in the west, the east or the centre. These agents sell or service auto insurance, and while there may be jurisdictional variations in the products offered or regulatory requirements, their core function is fairly similar no matter where they live or work. It makes sense to CADRI that core requirements for these employees should be the same as well. Where there are true jurisdictional differences, or the necessity to take on a specialty like commercial insurance, a good approach would be to design modules that reflect this truly specialized subject matter.

Ideally, CADRI would like to see every province align their curriculum so that agents only had to secure one licence level.

We suggest CISRO focus on the commonalities among the various provincial curricula with a goal of creating one licence that is acceptable to all jurisdictions. In our members' experience the Ontario general license could serve as a starting point for the highest level licence.

2. What works well within the current frameworks?

Currently, direct-relationship insurers must manoeuver through a maze of rules and varying continuing education requirements across the country. This amounts to a significant administrative burden for a role where there are a lot of common needs from province to province.

Beyond the cost and the complexity, the current licensing environment can create capacity challenges in customer care centres. (See Figure 3. *Impact of licensing process on customer experience*). For instance, if a company chooses to allow an agent to take customer calls before they have received licences for all the jurisdictions, they may not be able to serve some customers who contact them. Conversely, if the direct-relationship insurer chooses not to allow the agent to take calls until they are licensed in all the jurisdictions served by their office, it means fewer agents are available to serve the phone queue, which increases customer wait times. These challenges are amplified if a customer is seeking to purchase insurance or make a transaction which requires more than one call. Each time they reach out, behind the scenes, any number of agents are juggling licensing and renewal challenges.

If we had to choose one, Ontario's approach to licensing would be the model CADRI prefers. It offers agents one program and one exam.

3. How could the current frameworks be improved?

CADRI can envision a uniform licence available across Canada with standardized entry requirements: separating out specialized and commercial coverage to modules so that people working for an insurer who works in one or the other doesn't have to learn course materials and take exams that aren't required for their jobs. This streamlined structure functions well in Ontario.

4. Should there be minimum education and/or experience requirements before individuals enter the insurance industry (e.g., high school/CEGEP, work experience, etc.)?

In CADRI's experience the minimum standard for pursuing a career as an insurance agent is a high school education and a criminal background check.

5. What skills, knowledge and/or competencies should a broker or agent have?

CADRI suggests that it may make sense to eliminate the multiple-level licensing approach and have a Level 1 licence that works across jurisdictions. This may mean that the requirements to obtain a Level 1 licence increase apropos to current Level 1 standards. From there modules could be developed that are jurisdiction- or specialty-specific.

6. How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate.

There would be significant value in harmonizing the qualifications among the jurisdictions. This would represent a dramatic reduction in administrative costs and time spent navigation the complexities of the system as it exists today. Reorienting the training from jurisdictional differences would open increased opportunities to focus on increasingly important areas such as financial literacy and product suitability.

7. What challenges do you see in harmonizing educational qualifications?

We are confident that harmonization efforts coordinated by CISRO could be implemented fairly easily and look forward to working with all provincial and territorial regulators to support this effort.

8. In 2016, CISRO members introduced an updated version of the Life Licence Qualification Program for life insurance licensees (LLQP). The program included the following features:

- Completion of a uniform Competency Profile,
- A common Curriculum,
- Standardized course material,
- The use of Accredited Course Providers to deliver the course material
- Certification of successful completion of the study course by Accredited Course Providers.
- A uniform regulator-delivered examination.
- A modular approach to the course material and examination
- An open-book examination

Are there aspects of this licensing qualification regime that could be applied to general insurance education? Which would or would not be applicable?

All of these elements would be welcome in a refreshed approach to general insurance education. Building on the LLQP approach, the modular structure could be used to separate requirements for agents serving specialties including commercial clients, as well as to address any jurisdictional variations that are not covered in the primary module.

9. How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g., frequency, touchpoints, means of engagement)?

CADRI notes that the LLQP engagement module was very good. We would be pleased to use it as a model.

10. Please provide any other comments you wish to share with the Committee that you believe are relevant to this review.

Certain provinces have unique processes which can impose unintended impediments to efficient service to customers. The requirement of a designated representative to review agents' work in Alberta and Level 3 accreditation requirements in Newfoundland are two such examples. The more regulators can move to standardize requirements, the more time and energy an insurer can focus on service to consumers.

Exigences de qualification pour les agents et courtiers en assurance de dommages

Introduction

Le présent document fait suite à une demande de consultation par les Organismes canadiens de réglementation en assurance (OCRA) au sujet de la pertinence d'établir des exigences de qualification pan canadiennes pour les agents et courtiers en assurance de dommages.

Les OCRA souhaitent obtenir l'opinion des assureurs membres de la Corporation des assureurs directs de dommages du Québec (Cadd) afin de déterminer si les qualifications actuelles pour les agents et courtiers en assurance de dommages protègent adéquatement les consommateurs, et comment elles pourraient être améliorées.

Le mandat du comité de travail mis sur pied par les OCRA est :

- D'examiner les exigences en matière de formation qualifiante pour les agents et les courtiers en assurance de dommages au Canada, et de soumettre des recommandations concernant une approche harmonisée ; et
- D'évaluer comment les recommandations influenceraient la certification dans chaque juridiction si elles étaient mises en œuvre.

Les normes de qualification, les programmes de formation et les examens spécifiques à l'octroi de certificats d'expert en règlement de sinistres, qui pourraient être touchés par les recommandations, ne sont pas considérés comme faisant partie du mandat.

1. Commentaires généraux

Les assureurs membres de la Cadd accueillent avec intérêt l'intention des OCRA d'étudier la mise en place d'exigences communes quant à la qualification des agents et courtiers en assurance de dommages. La Cadd est d'avis que dans le contexte actuel de pénurie de main-d'œuvre qualifiée, la mise en place de telles exigences devrait se faire dans l'objectif de maintenir une réglementation souple qui facilite et encourage l'accès aux professions en assurance de dommages, et ce, tout en protégeant adéquatement le consommateur. Ainsi, nous croyons qu'il faut éviter le nivellement par le haut des exigences minimales pan canadiennes.

Les assureurs membres de la Cadd sont d'avis qu'il serait opportun d'entreprendre également une réflexion sur les normes de qualification, les programmes de formation et les examens spécifiques à l'octroi de certificats d'expert en règlement de sinistres.

Question 1 (À quoi devraient ressembler les exigences de qualification pour la certification en assurance de dommages?)

Les exigences minimales de formation académique devraient permettre de faciliter l'accès à la profession tout en tenant compte des spécificités régionales des différents systèmes d'éducation provinciaux.

Pour le Québec, il y aurait lieu de maintenir le statu quo quant aux exigences minimales de scolarité et d'expérience de travail, soit un diplôme d'études secondaires combiné à une expérience de travail reconnue. Le diplôme d'études collégiales ne devrait donc pas être obligatoire. La reconnaissance de l'expérience de travail pour les fins des exigences de qualification devrait être large, plusieurs types d'emplois étant susceptibles d'apporter des aptitudes et connaissances pertinentes au rôle de représentant en assurance de dommages. Quant aux exigences minimales, elles devraient être identiques pour un agent et un courtier.

Question 2 (Qu'est-ce qui fonctionne bien dans les cadres actuels?)

- L'ouverture du régulateur à reconnaître les permis des autres provinces.
- La possibilité de former à l'interne les candidats agents.
- La durée de stage de 45 jours donne d'excellents résultats au Québec et il n'y a pas lieu d'en augmenter le nombre de semaines.

Question 3 (Comment les cadres actuels pourraient-ils être améliorés?)

Chaque province a des exigences particulières qui sont difficiles à concilier. Il serait opportun d'en valider la pertinence, et ce, dans l'optique d'éliminer la complexité, d'augmenter la mobilité interprovinciale des agents et de faciliter l'accès aux professions en assurance de dommages.

Les programmes de formation continue des agents pourraient être harmonisés entre les provinces et nous croyons opportun que des formations techniques en bâtiment et en automobile soient ajoutées au curriculum de formation continue.

Question 4 (Devrait-il y avoir des exigences minimales en matière de scolarité ou d'expérience)

Tel qu'énoncé à la question 1, nous sommes d'avis qu'il faut maintenir le statu quo quant aux exigences en matière de scolarité et d'expérience.

Question 5 (Quelles aptitudes, connaissances ou compétences un courtier ou un agent devrait-il posséder?)

Les agents et les courtiers devraient posséder les mêmes compétences de base. Il y aurait lieu d'établir une liste des compétences minimales identiques dans chaque province et de la bonifier en fonction des particularités régionales.

Il faudrait également revoir les compétences de base minimales en fonction de la nouvelle réalité du marché et adapter les programmes de formation en conséquence.

Nous croyons qu'un agent/courtier d'assurance devrait posséder les compétences de base suivantes :

- Compréhension du cadre législatif encadrant l'assurance de dommages.
- Rôle conseil, au-delà de la connaissance du contrat d'assurance.
- Connaissances techniques qui permettront de bien évaluer les conditions relatives à l'aggravation d'un risque.
- Obligations déontologiques applicables au représentant en assurance de dommages.
- Connaissances générales en bâtiment et en automobile.
- Capacité d'utiliser un clavier et aisance avec les outils technologiques.
- Aisance avec Internet et les nouvelles technologies.
- Aptitude pour le service conseil afin d'être en mesure de vulgariser l'information.
- Écoute et empathie.

Question 6 (Quels seraient les bénéfices pour votre organisation ou pour l'industrie d'harmoniser les exigences de qualification entre les juridictions?)

L'harmonisation des exigences de qualification favoriserait la mobilité de la main d'œuvre entre les provinces, permettrait de simplifier, de standardiser et d'uniformiser les programmes de formation et de développement des compétences. L'harmonisation permettrait également aux assureurs d'offrir une expérience client uniforme à travers les juridictions où ils exercent leurs activités et faciliterait l'intégration des exigences à venir quant au traitement équitable des clients.

Question 7 (Quels défis l'harmonisation des exigences de qualification comporte-t-elle selon vous?)

L'harmonisation des exigences de qualification comporte plusieurs défis tels que les exigences minimales de scolarité étant donné les systèmes différents entre les provinces, la mise à niveau des agents actuels si les exigences augmentent et le risque de nivellement par le haut des exigences minimales (ex : durée des stages, on ne verrait pas la pertinence d'augmenter la durée minimale des stages au-delà de 12 semaines par discipline).

Question 8 (Programme de qualification en assurance de personnes (PQAP), Y a-t-il des aspects de ces normes de qualification qui pourraient être appliqués à la formation en assurance de dommages? Quel aspect pourrait ou ne pourrait pas être utilisé?)

Selon le PQAP, la seule formation éligible est celle dispensée par les établissements de formation reconnus de niveau collégial. Le niveau de scolarité exigé est donc plus élevé qu'en assurance de dommages. De plus, les assureurs ne semblent pas avoir l'opportunité de former à l'interne les candidats, qui doivent obligatoirement suivre la formation de l'un de ces établissements. Nous sommes d'avis qu'il faut maintenir la reconnaissance de la formation donnée à l'interne par les assureurs.

Le programme PQAP semble offrir moins de flexibilité, et son application au domaine de l'assurance de dommages est susceptible de complexifier l'embauche d'agents, particulièrement dans le contexte où la main-d'œuvre qualifiée se fait rare.

La Cadd est d'avis que lorsque des changements réglementaires sont introduits, les régulateurs devraient fournir aux assureurs le matériel nécessaire à la mise à jour des formations et également s'assurer que les programmes de formation dispensés par des firmes externes soient mis à jour.

Question 9 (Comment suggéreriez-vous que le Comité consulte les parties prenantes au fur et à mesure que la révision progresse)

Les assureurs membres de la Cadd aimeraient être consultés au fur et à mesure de l'avancement des travaux, selon un échéancier connu à l'avance, et ce, afin de leur donner le temps nécessaire pour contribuer efficacement aux travaux de réflexion. Si un comité consultatif était mis en place, la Cadd serait intéressée à en faire partie.

Question 10 (Autres commentaires)

Dans le contexte où les exigences relatives à la certification et les programmes de formation seraient harmonisés entre les juridictions, il y aurait lieu de s'interroger aussi sur l'harmonisation des processus de renouvellement de permis.

Conclusion

La Corporation des assureurs directs de dommages du Québec (Cadd) remercie le Comité de révision des normes de qualification en assurance de dommages (CRNQAD) pour son invitation à participer aux travaux relatifs à l'harmonisation des exigences de qualification pour les agents d'assurance.

Si des informations ou précisions additionnelles étaient requises suite à la lecture de ce document, nous vous invitons à contacter monsieur Denis Côté, directeur général de la corporation, au 581 986-9762 ou par courriel à Denis.cote@outlook.com .

Submission from CADD – Unofficial translation

Introduction

This document is in response to a request from CISRO for feedback regarding the appropriateness of establishing Canada-wide qualification requirements for general insurance agents and brokers.

CISRO seeks the opinion of insurers who are members of the Corporation des assureurs directs de dommages du Québec (CADD) to determine if the current qualifications for general insurance agents and brokers adequately protect consumers, and how they could be improved.

The mandate of the working committee set up by CISRO is:

- Review qualifying training requirements for general insurance agents and brokers in Canada, and make recommendations for a harmonized approach; and
- To evaluate how the recommendations would influence the certification in each jurisdiction if they were implemented.

Qualification standards, training programs and exams specific to the granting of claims adjuster certificates, which may be affected by the recommendations, are not considered part of the terms of reference.

1. General Comments

The insurers who are members of CADD welcome CISRO's intention to study the establishment of common requirements for the qualification of general insurance agents and brokers. CADD believes that in the current context of a shortage of skilled labour, the implementation of such requirements should be done with the objective of maintaining flexible regulation that facilitates and promotes access to general insurance professions in Canada, while adequately protecting consumers. Thus, we believe we must avoid raising the minimum requirements across Canada to a level that is too high.

CADD members believe that it would be appropriate to also consider the qualification standards, training programs and exams specific to the granting of claims adjuster certificates.

Question 1 (What should the qualification requirements for general insurance certification look like?)

The minimum requirements for academic training should facilitate access to the profession while taking into account the regional specificities of the various provincial education systems.

For Quebec, the status quo should be maintained with regard to the minimum requirements for education and work experience, namely a high school diploma combined with recognized work experience. The college diploma should not be mandatory. Recognition of work experience for the purposes of qualification requirements should be broad, with several types of jobs likely to bring skills and knowledge relevant to the role of general insurance representative. The minimum requirements should be identical for an agent and a broker

Question 2 (What works well in the current framework?)

- Regulator's openness to recognize licenses from other provinces.

- The possibility of internally training candidate agents.
- The 45-day probationary period gives excellent results in Quebec and there is no need to increase the number of weeks.

Question 3 (How could existing frameworks be improved?)

Each province has special requirements that are difficult to reconcile. It would be appropriate to validate their relevance, with a view to eliminating the complexity, increasing the interprovincial mobility of agents and facilitating access to general insurance professions.

Continuing education programs for agents could be harmonized between the provinces and we believe it is appropriate for technical training in the construction and automotive sectors to be added to the continuing education curriculum.

Question 4 (Should there be minimum requirements for education or experience)

As stated in question 1, we believe that the status quo with respect to education and experience requirements must be maintained.

Question 5 (What skills, knowledge or skills should a broker or agent possess?)

Agents and brokers should have the same basic skills. It would be appropriate to establish a list of identical minimum competencies in each province and to build on it according to regional particularities.

The basic minimum skills should also be reviewed in light of new realities in the marketplace and the training programs should be adapted accordingly.

We believe that an insurance agent / broker should have the following basic skills:

- Understanding of the legislative framework governing general insurance.
- Advisory role, beyond the knowledge of the insurance contract.
- Technical knowledge that makes it possible to properly assess conditions relating to aggravation of risks.
- Ethical obligations applicable to the general insurance representative.
- General knowledge of construction and automobiles.
- Ability to use a keyboard and ease with technological tools.
- Ease with the Internet and new technologies.
- Ability to provide advice in a way that makes the information clear and accessible.
- Listening and empathy.

Question 6 (What would be the benefits for your organization or industry to harmonize qualification requirements across jurisdictions?)

Harmonization of qualification requirements would promote labor mobility among provinces, simplify and standardize training and skills development programs. Harmonization would also allow insurers to provide a consistent customer experience across the jurisdictions in which they operate and facilitate the integration of future requirements for the fair treatment of customers.

Question 7 (What challenges do you think the harmonization of qualification requirements entails?)

The harmonization of qualification requirements has several challenges such as minimum education requirements given the different systems between provinces, the upgrading of existing agents if the requirements increase and the risk of leveling up the minimum requirements (ex. : duration of probationary periods, we would not see the relevance of increasing the minimum duration of these beyond 12 weeks per discipline).

Question 8 (Are there aspects of the LLQP that could be applied to general insurance training, what aspects could or could not be used?)

The only eligible training for LLQP is that provided by recognized college-level training institutions. The level of education required is therefore higher than for general insurance. In addition, insurers do not seem to have the opportunity to train candidates internally, who must attend the training of one of these institutions. We are of the opinion that the recognition of the training given internally by the insurers must be maintained.

The LLQP program seems to offer less flexibility, and its application in the general insurance field is likely to make the hiring of agents more complex, particularly in a context where skilled workers are scarce.

CADD is of the view that when regulatory changes are introduced, regulators should provide insurers with the necessary materials to update training and also ensure that training programs provided by external firms are up-to-date.

Question 9 (How would you suggest that the Committee consult with stakeholders as the review progresses)

CADD members would like to be consulted as and when the work progresses, according to a schedule known in advance, in order to give them the necessary time to contribute effectively to the review. If an advisory committee were set up, CADD would be interested in becoming part of it.

Question 10 (Other comments)

In the context where certification requirements and training programs would be harmonized across jurisdictions, there is also a need to consider the harmonization of license renewal processes.

2. Conclusion

CADD thanks the GILQR Committee for its invitation to participate in the work related to the harmonization of qualification requirements for insurance agents .

Should additional information or clarification be required following the reading of this document, we invite you to contact Mr. Denis Côté, Director General, at 581-986-9762 or by email at Denis.cote@outlook.com.

Comments from Credit Union Insurance Services Association (CUISA)

Questions
The Committee has developed the following questions in order to stimulate discussion and thought. Please feel free to provide as much or as little detail as you deem appropriate.

1. As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?

The overall framework for the education and licensing requirements should help support the necessary skills and knowledgebase required to support the level of license held.
The ideal structure for the level of license is as follows:

- Trainee License:
  Available for a specific period, able to complete specific tasks under direct supervision while taking the courses required to obtain a level 1 license
- Level 1:
  Limited authority; can discuss and issue personal lines policies with the oversite of a level 2 licensee; only able to discuss insurance within the brokerage premises.
  Courses needed to support this license; an understanding of Principle and practices, Insurance essentials, privacy
- Level 2:
  Ability to sign insurance policies and operate outside of the brokerage premises, can sell all general insurance products except for Commercial, which can be issued under supervision
  Courses required for this level of license should be focused on general insurance as well as Principle and Practices for Commercial Insurance
- Level 3:
  Ability to sign insurance policies and operate outside of the brokerage premises, can sell all general insurance products including Commercial Insurance
  Must hold a level 2 license to be eligible for a level 3 license. Courses required for this level of license should be focused on commercial insurance
- Level 4:
  Insurance Manager/Principal
  Must hold a level 3 license to be eligible for a level 4
  Courses required for this level of license focus on management and leadership skills as well as pertinent information in running/operating and owning your own brokerage

2. What works well within the current frameworks?

That there are courses available that are recognized across the country.

3. How could the current frameworks be improved?

The current course structure is outdated – it doesn't meet operational requirements to obtain the appropriate level of licensing to support the appropriate knowledge level. In addition the current offering does not support learning growth, in the event that someone does not pass their exam, there is no ability to obtain feedback from to understand where the knowledge gaps are.

4. Should there be minimum education and/or experience requirements before individuals enter the insurance industry (e.g., high school/CEGEP, work experience, etc.)?

High School diploma

5. What skills, knowledge and/or competencies should a broker or agent have?

- Excellent interpersonal, customer service and sales skills
- Attention to detail balanced with the need to provide a quality product within strict timeframes
- Self-motivated with a willingness and ability to learn
- Critical thinking
- Sales
- Time management
- Interpersonal skills
- Technical Skills

6. How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate.

It make sense to have it all aligned. However, in order for the alignment to work, both the course offering as well as the level of licensing would need to be aligned.
If this was done then it would make it a more streamlined process for brokers moving between provinces and/or working cross provincially.

7. What challenges do you see in harmonizing educational qualifications?

- Aligning the licensing levels nationally
- You would be learning about specific information that is applicable to other provinces and not your own. In having a national course offering this is needed and could be of value to know/understand some of the provincial differences, however it will be important to know and understand your own provincial requirements very clearly.

8. In 2016, CISRO members introduced an updated version of the Life License Qualification Program for life insurance licensees (LLQP). The program included the following features:

- *Completion of a uniform Competency Profile,*
- *A common Curriculum,*
- *Standardized course material,*
- *The use of Accredited Course Providers to deliver the course material*
- *Certification of successful completion of the study course by Accredited Course Providers.*
- *A uniform regulator-delivered examination.*
- *A modular approach to the course material and examination*
- *An open-book examination*

Are there aspects of this licensing qualification regime that could be applied to general insurance education? Which would or would not be applicable?

All could be applied to the General Insurance Education however the inter-provincial differences would need to be addressed.

9. How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g., frequency, touchpoints, means of engagement)?

Once a high level framework is completed, survey the broker force nationally to obtain feedback to ensure it meets their needs as well as continue to work with broker associations at a more in depth level (for example create a broker working group with representatives from the associations with regular touchpoints to assist through the process).

10. Please provide any other comments you wish to share with the Committee that you believe are relevant to this review.

The course offering provided by the CIP Program better aligned with the current needs of the brokers.

The framework and education should be applicable to Brokers and Agents.

Thank you.

Jason Brunelle
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Canadian Insurance Services Regulatory Organizations (CISRO)
General Insurance Licensing Qualification Review (GILQR) Committee
cisro-ocra@fsco.gov.on.ca

Re: CISRO General Insurance Educational Qualifications

Dear Committee Members,

On behalf of Desjardins General Insurance Group (DGIG), I am pleased to respond to your invitation for comments on the general insurance licencing requirements across the country. We welcome the opportunity to suggest ways to modernize and harmonize the approach for the benefit of insurance consumers and our industry.

Who we are

DGIG is a subsidiary of Desjardins Group, the leading cooperative group in Canada with over $276 billion in total assets; 7 million members & clients.

DGIG is one of the top three Property & Casualty insurers in Canada with over 4 million policies in force. We market under the Desjardins Insurance and State Farm banners, and to the group market under The Personal banner. We are also active in the white label P&C insurance market, underwriting well-established Canadian financial institutions such as CIBC.

We are a national direct writer with our clients choosing to do business with us either through our almost 1750 licenced general insurance agents who are employed by DGIG and work from our facilities or through our Desjardins Agent network which consists of approximately 475 independent contract agents who are small business owners across the country who exclusively market Desjardins insurance products. Desjardins Agents also employ over 1400 team members who are licenced general insurance agents. DGIG sponsors the general insurance licences of Desjardins Agents and their employees.

Our Current State

Presently the variations across the country of licencing educational requirements, authority levels and of licencing process add complexity and administrative costs but are without clear evidence of increased consumer benefit. Additionally the related administrative process of licence form completion and payment can take too long to be completed resulting in delayed careers and service impacts to insurance consumers.

Future State Opportunity

We have reviewed the response prepared by the Canadian Association of Direct Relationship Insurers (CADRI) and support the comments they have provided to you.

We see significant value in harmonizing across the country the educational requirements to achieve a General Insurance licence as well as continuing education requirements. Wrapped around the licencing educational requirements process is the supporting regulatory administrative process of forms completion and payment. The administrative process should also be reviewed for opportunities to streamline and automate so that an individual who has met all educational licensing requirements is able to immediately begin their career and become available to serve the needs of insurance consumers.

If CISRO or any of its members should contemplate changes to insurance licensing oversight, it is important to understand that our Desjardins Agent Network is not comparable to the insurance broker model nor to a direct writer employee agent model. To avoid unintended negative consequences, we welcome the opportunity for dialogue about its unique aspects whenever licensing oversight decisions are being considered.

Our licenced agents play a critical role in our value proposition. They are at the centre of the promises of value we provide to our clients. For that reason, our organization plays the leading role in the oversight and training of our agents to ensure the highest degree of professionalism and care. We would desire that ability to continue as part of any future regulatory approach.

We would like to highlight 4 key steps to ensure that consumer interests are protected by ensuring highly knowledgeable general insurance agents while reducing the corresponding regulatory costs that are ultimately borne by insurance consumers.

1. Introduce a General Insurance "Base" Licence recognized across Canada

We recommend that CISRO take a uniform approach to the educational curricula which would provide one base general insurance licence recognized across Canada. To be clear, additional modules covering jurisdictional product variations would also be available and necessary for agents to be licenced in a particular province. The national base license complimented by this modular approach will ensure appropriate knowledge levels and at the same time, provide the flexibility to applicants to only pursue education that is relevant to their roles.

2. Introduce a national standardized examination process

Ideally this standardized exam across Canada would be administered by one national entity (e.g. Insurance Institute of Canada) to encourage national testing environment and results consistency and to provide insurers with a single point of contact for all testing related needs.

3. Include a continuous participant & stakeholder feedback process

Ensure that licensing education requirements and the testing approach continue to protect consumers and are considered fair and useful by participants and insurers, by incorporating a robust feedback process to identify opportunities for improvement.

4. Use the Life Licence Qualification Program (LLQP) framework as a guide

CISRO's updated version of Life Licence Qualification Program which includes a uniform competency profile; a common curriculum and standardized course material; a uniform examination with a modular approach to both the course material and examination is useful as a framework for updating the general insurance licence qualification program.

Thank you for the opportunity to provide our commentary.

Sincerely,



Sam Palmerio
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August 29, 2018

Ms. Joanna Reading
Policy Manager
Regulatory Coordination Branch
Financial Services of Ontario (FSCO)

PERSONAL & CONFIDENTIAL

Invitation to Comment: Insurance Brokers Association of Ontario's Response to Review Licensing Qualification Requirements for General Insurance Agents and Brokers Across Canada

Dear Ms. Reading:

Thank you for the opportunity to provide input into the review of harmonizing the approach to Property & Casualty Agents and Broker Licensing across Canada. As you are aware, the Insurance Brokers Association of Ontario (IBAO) is a trade association that has approximately 12,000 licensed brokers as its members. Our Association is a member of our national organization, the Insurance Brokers Association of Canada (IBAC) that represents approximately 38,000 licensed brokers across Canada.

The IBAO is very focused on consumer protection. As the only true consumer advocate within the property and casualty supply chain, we are very pleased to be engaged in this initiative.

It is essential that any profession that services consumers within the financial services sector is held to the highest professional standards. The Property and Casualty market in Ontario is very complex with a variety of options for personal and commercial insurance being available to consumers. In Ontario, although the open market is very beneficial to the consumer, added complexity is introduced through the number of insurance companies and different avenues in order to access those companies consumers must navigate.

One challenge for a consumer is to understand the differences between advisors and the value that each brings to the purchase decision. This goes beyond your current review, but is essential to ensure that consumers are indeed treated fairly and are adequately protected during and after the purchase itself.

Both IBAO and IBAC are very focused on ensuring its members have access to the highest quality of professional training. In addition to providing training to support the licensing requirements in place via the Registered Insurance Brokers of Ontario (RIBO), we offer high quality, professional designation programs such as CAIB and CPIB that are well established and recognized throughout the industry.

In addition to providing our own high quality education in support of individuals becoming licensed brokers, the IBAO has partnered with several Community Colleges to ensure that prospective brokers have choice in learning environments and locations throughout Ontario to safeguard the education is of the highest quality.

Given that you are investigating harmonization of licensing across Canada, there are a number of challenges we recommend be considered including, but not limited to:

- Regional / Provincial differences in insurance markets – for example - private versus public sector Auto, or private versus public provision of medical rehabilitation services in the event of an automobile claim;

- Regional / Provincial differences in the scale of risks – different commercial industries and size of industries centered in particular locations within the country;

- The prominence of different delivery mechanisms for consumers to access insurance products in different provinces – direct from an insurance company / from an Agent / from a licensed Broker.

In Ontario, we have one of the most competitive market places in the country with well over a hundred insurance companies offering insurance products through one distribution channel or another. Therefore, this market brings unique challenges when considering consumer protection and the licensing requirements of those that operate within it.

The IBAO would certainly encourage and welcome harmonized licensing across Ontario with our current RIBO licensing held out as the minimum requirement for all entrants; however, we may not be best placed to comment on the complexities of harmonization across the country.

I have added some comments below with respect to specific questions posed. If we can be of any further assistance or add further detail to any of our comments, please do not hesitate to let me know.

Yours truly,



Colin Simpson
Chief Executive Officer

CCIR SPECIFIC QUESTIONS

1. **As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?**

   Education requirements should take the perspective of the consumer. Can the consumer have confidence that regardless what avenue (distribution channel) they choose to purchase the insurance product, will they receive the same level of professional knowledge and consumer protections?

   In this regard, there would need to be a standard (minimum) level of professional training and education expected across a market in order to ensure that consumers will receive consistency of care. In this context, a market could be a single province or group of provinces or the country as a whole.

   In order to enforce such standards across a market, there would need to be consistency in approach in enforcement to ensure that all parties in the supply chain are treated fairly and consistently.

2. **What works well within the current frameworks?**

   In Ontario, there is clear accountability for licensing and compliance. RIBO performs an admiral job in ensuring professional standards are enforced, and that there is confidence in the broker profession within the market place.

3. **How could the current frameworks be improved?**

   There needs to be clearer communication to consumers around the advantages and disadvantages of each delivery mechanism of an insurance product. This may not be a licensing issue, but consumers need to understand the limitations of what is being offered and from whom it is being offered.

   There also needs to be consistency of professional standards across all distribution channels so consumers have comfort in the advice they are receiving. Given the above point, they would also need confidence in the limitations of that advice given the source of that advice.

4. **Should there be minimum education and / or experience requirements before individuals enter the insurance industry, i.e. high school / CEGEP, work experience, etc.?**

   The insurance industry is very complex; therefore, as a minimum, there needs to be some level of expectation that those in a consumer advisory capacity should have a base level of education and experience supporting their professional license. The IBAO is not the best organization to discuss the specifics around minimum education, but if the industry is serious about the high quality of professional advice to protect consumers, there needs to be a framework to encourage and grow advisors professionally. If the constraints on professional development are too tight, the supply of quality advisors may diminish, too loose and the quality will suffer. A clear, progressive framework with expectations and measurable levels of attainment is what is needed and is currently in place for broker licensing today via RIBO.

5. **What skills, knowledge and / or competencies should a broker or agent have?**

   IBAC has carried out extensive work across Canada to develop a Broker Competency Profile (BCP) that is used as the bedrock from which professional development courses and training programs are developed. The BCP has been created through interacting with many seasoned, licensed individuals and as such, is the standard used by all Member Associations to develop their licensing programs and tailored to their own provincial requirements.

6. **How much value would there be to your organization and / or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate.**

   In some respects it would be very valuable, especially for insurance businesses that sell products across different jurisdictions whether it be inter-provincial commercial businesses (e.g. haulage companies / manufacturers) that cross borders, or whether it be consumers with interests in certain geographical areas that may cross jurisdictions (house in one province, cottage in another).

   The challenges that cross border selling creates is that certain markets have their own specific nuances and regulatory compliance is enforced within different jurisdictions, so unless there is harmonization of markets and regulatory enforcement, there will likely always be a requirement for 'geographic' differences in education and as such, education qualifications.

   There is a strong case to be made to harmonize base requirements, as I am sure there is a level of commonality that could be achieved. I am unsure as to whether the effort would be comparable to the added value of doing so (unless there are specific gaps that have been identified in any particular jurisdiction).

7. **What challenges do you see in harmonizing educational qualifications?**

   Please refer to #6.

8. **In 2016, CISRO members introduced an updated version of the Life License Qualification Program for life insurance licensees (LLQP). The program included the following features:**
   - Completion of a uniform Competency Profile (Possible);
   - A common Curriculum (common complete curriculum is unlikely due to geographic complexities – "base" Curriculum could be possible);
   - Standardized course material (dependent upon above);
   - The use of Accredited Course Providers to deliver the course material (Agreed);
   - Certification of successful completion of the study course by Accredited Course Providers. (Agreed);
   - A uniform regulator-delivered examination. (Dependent upon the above);
   - A modular approach to the course material and examination. (Agreed);
   - An open-book examination (Agreed).

   Are there aspects of this licensing qualification regime that could be applied to general insurance education? Which would or would not be applicable?

   Life insurance is different from P&C business in that in general, the risks and claims remain relatively similar regardless of location. In the P&C industry, location makes a significant difference, specifically in certain lines of business like Auto in comparison, so removing geographical differences brings different challenges.

   As stated above certain property and casualty markets have their own specific nuances, and regulatory compliance is enforced within different jurisdictions. Therefore, unless there is harmonization of markets and regulatory enforcement, there will likely always be a requirement for 'geographic' differences in education and as such education qualifications.

Having said this, commonality could certainly be explored on the framework in how licensing is administered and assessed. Given that the IBAO is very supportive of ensuring that the highest professional standards are adhered to in the market, accrediting providers of education / the use of certification / modular and modern approaches to studying would all be recommended. This is specifically the case within certain jurisdictions, e.g. within a specific province as opposed to cross border where complexities could be introduced.

9. **How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g. frequency, touch points, means of engagement)?**

   The IBAO has found that working groups are the best way to provide valuable insight and input into discussions such as this. Open dialogue will deliver more detail and a better understanding than through written responses such as this one. If the exercise is to be completed over the next twelve months, we would suggest a face-to-face discussion before the end of the year with possibly a few other touch points as ideas and recommendations are formed.

10. **Please provide any other comments you wish to share with the Committee that you believe are relevant to this review.**

    It can be a bit tricky to provide the best input on a cross country initiative when our organization is geographically limited itself. Possibly seeking specific input from highly regarded professionals within our industry that operate across jurisdictions may be valuable to your research. If this is an avenue you would like to explore, we would be more than willing to assist in locating relevant individuals from our membership.

IBAO Education Brochures:

RIBO: https://www.ibao.org/wp-content/uploads/2018/01/2018ribobrochure.pdf

CAIB: https://www.ibao.org/wp-content/uploads/2018/01/2018CAIBbrochure.pdf

CISRO GILQR Invitation to Comment – Insurance Brokers Association of Alberta (IBAA) Submission

1. **As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?**

   The educational requirements for licensing should be based on the successful completion of an exam or the successful completion of a recognized equivalent exam or educational program (i.e., a CAIB module or multiple modules).

   This approach is already utilized in most of the Canadian jurisdictions and would provide applicants with choice of taking an applicable study course of their choosing or challenging an exam. The method of study, course provider, or course material should be at the discretion of the applicant. If applicants can pass the jurisdictional exam or exam deemed equivalent, then they have proven that they have the knowledge required to deal with the public in a competent manner.

2. **What works well within the current frameworks?**

   The ability for the applicant to choose from a variety of exams, course providers, or programs in order to prove that they have the required knowledge in order to hold a licence in that particular jurisdiction.

3. **How should the current frameworks be improved?**

   The current frameworks could be improved by harmonizing licensing levels and associated exam/equivalency requirements across the jurisdictions. Harmonization would allow for greater labour mobility of individuals and easier multi-jurisdiction licensing for insurance operations that span multiple jurisdictions. If each jurisdiction had licensing levels with the same authority and requirements attached, then a common exam could be potentially be developed for each level of licence. Supplementary or interchangeable examination sections could be required for differences between jurisdictions (e.g., provincial auto). This system would allow for common equivalencies between jurisdictions as well. In addition to common knowledge requirements, a comprehensive and detailed listing of required knowledge should be public information accessible by both education providers and applicants.

4. **Should there be minimum education and/or experience requirements before individuals enter the insurance industry?**

   No, if individuals are able to pass a licensing exam or complete education programs considered to be equivalent to the exam, then they have proven that they have the required knowledge base to deal with the public competently. Minimum education and/or experience requirements could create an additional documentation burden for immigrants and possible confusion for those individuals coming from other countries. Such requirements would also create additional administrative burden on the regulators to determine equivalencies to minimum requirements.

5. **What skills, knowledge and/or competencies should a broker or agent have?**

   A broker or agent should have competency in the following areas:

   - Fundamental insurance concepts, processes, ethics, and theory of insurance
   - Insurance policy wordings, coverage options, endorsements, exclusions, warranties, and conditions for automobile, personal property, and commercial risks
   - Surety.

   Other skills, competencies, and knowledge that an agent or broker will be required to have or learn on the job (e.g., an understanding of the technology used in the brokerage) should be determined or taught by the employer. Some required skill sets for the success of the business, such as customer service, are not relevant to determining competency for advising the public on technical insurance matters.

6. **How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate**.

   The Insurance Brokers Association of Alberta (IBAA) represents approximately 90% of the insurance brokerages in the province of Alberta. A large percentage of our member brokerages are licensed in multiple jurisdictions. IBAA supports the harmonization of educational qualifications between jurisdictions through the use of common licensing levels and common educational equivalencies. IBAA also supports the development of a harmonized (or partially harmonized) modular exam.

7. **What challenges do you see in harmonizing educational qualifications?**

   Challenges will include legislative and regulatory amendments required in some jurisdictions, analysis of available equivalency programs, determining appropriate learning objectives and broker/agent authorities common to all jurisdictions, developing appropriate common examination questions, and determining the licensing process for provincial differences. Exams will also need to be available electronically.

8. **Are the aspects of the LLQP program licensing qualification regime that could be applied to general insurance education? Which would or would not be applicable?**

A modular approach to the examination and an open book examination would be applicable to general insurance.

Completion of a uniform competency profile is not applicable as each jurisdiction currently has different licensing levels as well as varying scopes of authority within those different levels. Each jurisdiction will need to determine what the competency profile is for their levels of licensing. A uniform competency profile could potentially be applied if all jurisdictions adopted common licensing levels.

While some common insurance theoretical concepts could result in a shared/common module, a common curriculum is not applicable for a number of reasons. Most jurisdictions have differing automobile insurance programs. In addition to general differences between private and government auto insurance, the administration and the associated liability also differs between government insurers and varies between private insurers according to jurisdictional legislation. Quebec also has a different legal system. As well, regional differences within property insurance may warrant extensive knowledge of certain types of risk (e.g., coastal storm surges that do not occur on the prairies) and knowledge of statutory regulations that differ between jurisdictions (e.g., some provinces legislate a basic fire policy while others do not, and legislated coverage differs between the provinces that do describe a fire policy in their statutes)..

Standardized course material could be applicable for some general insurance theoretical concepts but, given the difficulties of a common curriculum noted above and in question 7, a better solution would be to provide a detailed outline of these topics and learning outcomes to educators and students. Existing education providers can alter their existing material to comply with the required learning outcomes provided that the learning outcomes are clear, detailed, and communicated to them in a timely manner. This process would ensure that educators are providing training and training materials that cover the actual concepts that will be tested and are deemed to be necessary knowledge in order to deal with the public in the various regions of Canada on insurance matters. Drawing on existing education providers will also be more time and cost effective than starting from scratch.

Requiring the successful completion of a specified course offered by an accredited course provider is also not applicable for General insurance certification. The requirement would create an extra barrier for those entering the insurance industry. Individuals learn by different methods of study. Some individuals who were previously in the industry may already have the knowledge required to pass the examination. The requirement to complete a course prior to taking an examination places a potentially significant financial burden on an individual who does not need a course to pass the examination. The mandate for regulators is to ensure that the licensed individual is competent to deal with the public. Potential agents/brokers should have no other

requirement than to pass the licensing examination and, therefore, prove that they have the required knowledge to be deemed competent.

9. **How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g. frequency, touchpoints, means of engagement)?**

   Can the committee please provide stakeholders with a summary of the comments received from all stakeholders? Additionally, could the Committee also provide a list of any subsequent questions that arise from the comments received?

   We would be very pleased to get an update on this issue following each Committee meeting via email and have the opportunity to provide additional consultation/commentary following any Committee recommendations.

10. **Please provide any other comments you wish to share with the Committee that you believe are relevant to this review.**

    IBAA supports the harmonization of licensing requirements in jurisdictions across Canada. We also recommend that educational equivalencies be maintained (or introduced where lacking) in all jurisdictions. We support any initiatives that will lessen the administrative burden on those seeking to be licensed in multiple jurisdictions. Some suggestions for additional areas of harmonization would include a common format for licensing applications, common requirements for documentation required (e.g. police back ground check), similar placement of licensing application instructions on regulator websites, as well as step by step instructions for submitting licensing applications.

    IBAA would like to thank CISRO and the Committee for asking for our feedback. We are very pleased to be consulted as a stakeholder on this matter as forthcoming recommendations will affect each and every one of our members. It will also affect our Professional Development Department, our business model, and our not-for-profit association.

General Insurance Licensing Qualification Review Committee
Canadian Insurance Services Regulatory Organizations
Electronic Submission: *cisro-ocra@fsco.gov.on.ca*

CANADIAN INSURANCE SERVICES REGULATORY ORGANIZATIONS

September 2018 Consultation

The members of the Insurance Brokers Association of British Columbia are pleased to contribute to this review of licensing qualification requirements for general insurance in Canada. We applaud the Canadian Insurance Services Regulatory Organizations' efforts toward improving consumer protection and professional standards within the industry.

The Insurance Brokers Association of B.C. serves as the voice of the general insurance brokerage industry and promotes its members as the premier distributors of insurance products and services in British Columbia. IBABC is the primary provider of pre-licensing and continuing professional education for the general insurance brokers in B.C. IBABC represents the interests of the public and its member brokers to government and to industry stakeholders.

IBABC represents property and casualty insurance brokerages that employ more than 15,000 people in approximately 140 B.C. communities. Membership is voluntary and about 95% of B.C.'s insurance brokerages are members. Member offices are the consumer's choice for the vast majority of all property and casualty insurance policies and premiums written in the province. More than four million British Columbians meet in person with their insurance broker every year to insure their homes, vehicles, businesses and farms.

Consumer satisfaction with their insurance brokers is high. In survey after survey, consumers report that they value their brokers' knowledge, professional advice, unbiased review of their needs and coverage options, and service and advocacy in the event of a claim. IBABC member offices have an average of 13 staff members and therefore fit within the small to medium-sized enterprise (SME) category.

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General Insurance Licensing Qualification Review

1. **Jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?**
   The educational requirements should be aligned with a more realistic, stepped approach to licensing whereby licensing levels correspond to typical broker career progression and specialization. This would require education that focuses on:
   - Entry-level insurance basics – personal lines products, regulations compliance, and professionalism,
   - Mid-level licensing education should be split into two streams of specialization – personal lines and commercial lines – and brokers should be licensed accordingly, perhaps in some cases achieving an unrestricted licence, and
   - Top-level licensing education should focus on brokerage management, as it does today in British Columbia. The national Canadian Accredited Insurance Broker (CAIB) designation program is being updated to reflect today's insurance product and marketplace, and to be more approachable for all students.

   As a national program maintained with input by insurance brokerage professionals from across Canada, CAIB should be the core program for broker licensing education across the country.

2. **What works well within the current frameworks?**
   In British Columbia for decades, the Fundamentals of Insurance and CAIB programs have been the main prerequisite courses for the three levels of licensing, and have performed well in this capacity. These programs contain extensive content that can be easily aligned with step-licensing requirements. And with impending updates to these programs that include a new modular approach, they will continue to be comprehensive, flexible and relevant for licensing education.

3. **How could the current frameworks be improved?**
   Per above, by aligning licensing education with common licensee progression through the industry and with specialization. Also, more emphasis should be placed on regulatory compliance and professionalism/ethics than is the case today.

4. **Should there be minimum education and/or experience requirements before individuals enter the insurance industry (e.g., high school/CEGEP, work experience, etc.)?**
   High school as a minimum.

5. **What skills, knowledge and/or competencies should a broker or agent have?**
   The national course providers, such as the member associations of the Insurance Brokers Association of Canada, have addressed this by compiling proprietary competency profiles as the foundation of their course content.

6. **How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions?**
   It may benefit licensees by enabling them to more easily move and/or be licensed between provinces. For IBABC, it may lessen the demand for B.C.-developed licensing courses to a small degree, as brokers from other province may not have to pass B.C. exams to be licensed here. Likewise, B.C. brokers may have easier registration requirements as a licensed broker in other Canadian jurisdictions. Conversely it is critical to note that broker business models vary between the provinces. Specifically, staffing levels, licensing levels, work flows etc. in B.C. do not mimic the norms in other provinces. As a result, harmonizing education, qualification, and licensing across Canada may significantly increase costs for brokers in some jurisdictions.

7. What challenges do you see in harmonizing educational qualifications?

The biggest challenge will be to create effective, efficient and uniform content in subject areas that differ between the provinces. This includes, but is not limited to, differences in automobile-insurance regulations and products, provincial statutes and regulations, cultural and business environments, and broker business models. There might be a temptation to expect students to learn all the facts across all the provinces, but this would be overly burdensome and increase the licensing-education drop-out rate.

8. In 2016, CISRO members introduced an updated version of the Life Licence Qualification Program for life insurance licensees (LLQP). Can these be applied to general insurance education?

Yes, there are aspects of this licensing qualification regime that could be applied to general insurance education. These aspects would be applicable, as follows:

- **Completion of a uniform competency profile** – This has already been done by major course providers.
- **Common curriculum** – This is possible through CAIB, and any such curriculum would have to be augmented in each province to account for regional differences.
- **Standardized course material** – Same as above.
- **The use of Accredited Course Providers to deliver the course material** – This should be the purview of provincial brokers associations, as we are the primary providers of broker education in each province and, as non-profit entities, we provide more rigorous content as we're not biased by for-profit motivations.
- **Certification of successful completion of the study course by Accredited Course Providers** – This is done for the national CAIB program, and it's an important part of designation completion.
- **A uniform regulator-delivered examination** – Over a period spanning several decades IBABC has invested heavily in facilitating examinations for the Insurance Council of B.C. Nearly a decade ago we led the industry in offering online licensing examinations across B.C. Since we already have all the systems, procedures, and expertise in place to handle examinations, it would be a great expense and ongoing burden to the Insurance Council of BC., for example, to have to set up and run their own examination system. IBABC holds its exam system, and its relationship with the Insurance Council of B.C., as a model for rest of Canada.
- **A modular approach to the course material and examination** – This is desirable, as per our position on education aligned with stepped licensing, above. Modularization will make educational content more flexible to ongoing changes in licensing-education needs. This modular approach has been used successfully in some course offerings, such as IBABC's New Broker Essential Skills Program, and IBAC is currently working on a modularized approach as a part of its current CAIB rewriting project.
- **An open-book examination** – Open-book exams aren't necessarily easier, as examinees have to know what to look for and where to find information. Because brokers often review and refer to policy wordings, etc., in their day-to-day work, the open-book concept aligns with this. However, in determining the best methodology for exams, the obvious efficiencies of online examinations must be a factor.

It is important to note, relatively speaking, that in the life insurance industry standardization across the provinces has historically been the norm. The Canadian P&C landscape, conversely, has grown more provincial-centric with time. The concept of P&C qualification and license harmonization is much more complex.

9. **How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g., frequency, touchpoints, means of engagement)?**
   Best practices are in place in many jurisdictions. The Committee should consider meeting with brokers, brokers' associations, and regulators in all provinces to have direct discussions about these issues. This will better serve the Committee to properly understand the significant differences between the provinces and the challenges in harmonizing broker education across the country. As these meetings progress, their summaries could be posted on a website forum or blog with an opportunity for stakeholders to stay up-to-date on the discussions and to comment on them.

10. **Please provide any other comments you wish to share with the Committee that you believe are relevant to this review.**
    Insurance intermediaries are regulated provincially, their licensing criteria and pre-requisites are determined provincially; therefore, their licensing and continuing education should continue to be designed, developed, delivered and managed provincially so as to remain responsive to regulatory and market demands.

    Since the early 1900s when they formed associations to advocate for regulatory standards, Canadian insurance brokers have held professionalism as their guiding principle; brokers' advocacy for professional standards led to the associations' delivery of qualifying courses and exams starting in the 1950s and continuing to this day.

    Allowing professional development and training of insurance intermediaries to be managed at the provincial level has resulted in regulatory efficiency and consumer confidence; this should be a major consideration in the Committee's recommendations. Licensing levels and criteria can and should be modernized, but the development and delivery of education and examinations is occurring at the right level, and is working well.



INSURANCE BROKERS ASSOCIATION OF CANADA
ASSOCIATION DES COURTIERS D'ASSURANCES DU CANADA

August 31, 2018

To: CISRO General Insurance Licensing Qualification Review Committee (GILQR)
Re: Invitation to Comment

As a national association, the Insurance Brokers Association of Canada (IBAC) represents and promotes the collective interests of Canadian insurance brokers through our 11 provincial/regional Member Associations. IBAC plays a leadership role on national issues, and our Member Associations advocate directly with each of their respective provincial governments and regulators.

IBAC and our Member Associations are experts in insurance broker education and professional development. IBAC appreciates the opportunity to contribute to CISRO's consultation on licensing qualifications for general insurance agents and brokers. In general, IBAC supports the concept of harmonizing licensing qualification requirements across the country. At the same time, a national framework must also respect the jurisdiction and autonomy of the provinces and territories, and respond to the needs and expectations of both consumers and brokers.

IBAC is a long-standing champion for consumer protection. Our historical position on the Bank Act is based on the principle that consumers should not be sold insurance products at the point of granting credit – a position that has now been upheld with the completion of the latest Bank Act review. We are also strong proponents for increased consumer awareness on important issues such as flood risk and cannabis legalization, and an advocate for consumers in the areas of fintech, open banking, and privacy issues.

Any effort toward harmonization across the country must be done from the perspective of the best interest of the consumer. In looking through this lens, there are a number of factors to consider, including the consistency of the consumer experience across a range of jurisdictions; consumer confidence that their insurance advisor has acquired a sufficient level of knowledge and expertise; and the importance of licensing qualifications across all insurance delivery channels.

Potential benefits include the portability of qualifications for insurance brokers who choose to move within Canada, as well as a nationally consistent credential recognition process for new Canadians.

To be feasible, the harmonization of licensing qualifications must provide clarity regarding the specific accountabilities of all parties, consistency in application of the standards, and a robust monitoring structure. Care must also be taken to minimize additional costs and red tape for the industry.

It will also be extremely important to respect the jurisdiction and autonomy of the provinces and territories. Currently, provincial legislation and regulations differ on issues ranging from public vs private auto insurance, to regulations for cannabis legalization. Against this backdrop of provincial variation, consumers must be able to ensure that an advisor has expertise in the province or territory where coverage is being sought.

Our Member Associations across Canada provide excellence in education for their broker members and are well-positioned to continue to do so. Existing programs are cost-effective and designed to meet the needs of working brokers through a variety of course offerings and educational opportunities. In addition, the movement towards digital delivery ensures timely updates that incorporate new issues and information.

Our Member Associations offer a range of courses and programs to brokers and other brokerage professionals across the country. Each program is developed in collaboration with subject matter experts – all brokers in active practice.

IBAC's Canadian Accredited Insurance Broker program (CAIB) is our highest-profile program in our curriculum. CAIB was launched in 1996 as a national designation program, and there are over 11,000 graduates. In addition to CAIB's status as a designation program, it is also recognized by regulatory bodies in several provinces as a pre and step-licensing vehicle. We are currently conducting a comprehensive review and revision of CAIB to ensure that content is current and relevant to the profession.

The courseware is designed for classroom and/or self-directed study. Following the successful online exam model established by our Member Association in British Columbia, IBAC is in the process of transitioning to online delivery options for CAIB examinations, which are currently paper-based. CAIB exams will be available online in Ontario in December of this year, and expanded across the rest of country in the early part of 2019.

In addition to CAIB, Fundamentals of Insurance is also a high-profile, national program, in great part due to the fact that it is recognized by regulatory bodies in several provinces as a pre-licensing vehicle. Following our review and revision of CAIB, and development of associated online learning and examination options, we will do the same for Fundamentals of Insurance.

Together, these programs and others in our curriculum provide a solid foundation for excellence in broker qualifications and ensure that insurance consumers are well served by knowledgeable professionals.

IBAC is also an established authority on the competencies required of general insurance professionals. In recognition of this expertise, CISRO requested that IBAC create a Broker Skills Profile in 1998. This profile has evolved over the years, taking into account the changing industry and role of P&C brokers. The most significant evolution of the IBAC profile took place in 2017, with the development of the Insurance Broker Competency Profile (IBCP), replacing the Skills Profile.

The IBCP identifies ten broad competency areas, including Insurance Fundamentals, Claims Support, Ethics and Professionalism, and Business Development and Retention. Most of the competencies are applicable to all general insurance brokers, while some are geared to those in management positions. For licensing purposes, the focus should be on assessing competence in technical areas of insurance.

The IBCP is a proprietary document for the exclusive use of IBAC and our Member Associations. It is being used as a resource in our current review and revision of CAIB, and will support our future updates to the Fundamentals of Insurance materials.

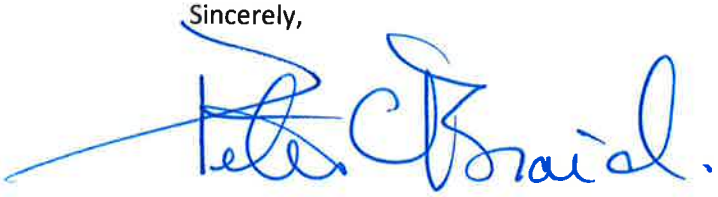
IBAC's IBCP is not a static document; it will evolve to meet the changing needs of the profession and consumers. This adaptability is crucial to the ongoing credibility of the insurance broker profession. Insurance is becoming more complex, and it is essential for brokers' qualifications to remain current.

An optimal approach to harmonization would leverage existing educational programs, and build on that strong foundation by standardizing the knowledge, skills and competencies that are common for all brokers. The resulting framework would provide consistent national guidelines as a basis for the design of compliant curricula, with provincial modules for specific content on the legislation and regulations of each jurisdiction.

This model would realize the benefits of a harmonized system, while helping to mitigate against the challenge of aligning all jurisdictions under a single regime by providing autonomy and flexibility in program design and delivery.

IBAC is pleased that CISRO is focusing attention on licensing qualifications for general insurance agents and brokers. We appreciate that this is a consultative process involving all stakeholders, and value the opportunity to participate in this important initiative. We look forward to continued dialogue.

Sincerely,



Peter Braid, CEO
Insurance Brokers Association of Canada (IBAC)

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August 31, 2018

Canadian Insurance Services Regulatory Organizations
cisro-ocra@fsco.gov.on.ca

Dear Committee;

Re: Harmonization of Licensing Qualification Requirements for General Insurance Agents and Brokers

OMIA is a non-profit trade association that represents 40 farm mutual insurers across the province. Our member companies are 100% policyholder owned. An essential part of our mandate is to provide quality education opportunities to staff, directors and sales intermediaries of our member companies.

We appreciate the opportunity to provide comments on the initiative to harmonize licensing and educational requirements for general insurance agents and brokers across the country. As our member companies are provincially regulated, we will be confining our remarks to the current Ontario licensing regime.

Although each jurisdiction has its own regulatory approach for the conduct of insurance, there are common expectations pertaining to the requirement for agents and brokers to have an appropriate level of professional knowledge, experience, integrity and competence. These are changing due to a number of factors including increased consumer expectations, more complicated products, and increased competition. Faced with these challenges, it is imperative that agents and brokers achieve and maintain an appropriate level of professional knowledge.

We strongly believe that enhancing and standardizing licensing and continuing education requirements for agents/brokers will ensure all of them have the same base level of knowledge. Furthermore, a harmonized approach promotes efficiencies and costs savings, while ensuring consistent consumer protection across the country.

The harmonization of licensing and continuing education requirements dovetails nicely with the proposed *Treating Consumers Fairly* guideline. A key principle of the draft guidance is that agents and brokers must put the interests of consumers first. They must take the time to understand their needs and ensure they understand their rights and responsibilities, so they can make the most informed financial decisions possible. At OMIA, we are confident the intermediaries working for our member companies already treat consumers fairly, but also believe that ongoing professional education will only serve to reinforce their abilities to do so.

Responses to Questions:

1. ***What should the educational requirements for general insurance licensing look like?***

   We believe the requirements for general insurance agents and brokers should be the same. We support a structured, consistent approach to licensing and continuing education. In Ontario, that would mean both agents and brokers would have to pass a qualifying exam or its equivalent, be employed or sponsored by an insurer or RIBO-registered brokerage firm and obtain eight (8) hours of continuing education credits each year. The latter criteria would be new to agents.

   Some of our member companies have expressed a preference for the tiered approach for general insurance agent licensing found in Alberta and British Columbia. This approach is similar to that of RIBO in Ontario whereby a combination of time on the job, and completion of prescribed courses from accredited providers can enable an agent to obtain a higher level of license.

2. ***What works well within the current frameworks?***

   It is relatively easy in Ontario for a broker to obtain their continuing educating credits through IBAO or RIBO-accredited course providers. The time period within which to do so is well known.

   The current amount of CE hours required (8 for Level 1 brokers) seems appropriate although it is recognized the offerings must be relevant and of high quality.

   RIBO accreditation is subject to audit, both from the course provider standpoint and that of the broker who is responsible for tracking his/her own continuing education as well as to provide proof of the same upon request. We support this self-governing approach.

3. ***How could the current frameworks be improved?***

   We believe the current frameworks would be improved by making continuing education credits mandatory for agents and brokers. We would also recommend mandatory courses on Ethics and on Errors and Omissions.

It is imperative to preserve the integrity of the continuing education requirements i.e. powers of audit and inspection as currently exist at RIBO would be necessary. It may be beneficial to consider adding an annual attestation piece around CE credits to the license renewal process.

What is the proposed mechanism for tracking completion of continuing education for agents? Would it be FSCO's licensing section of their website?

There is a need to ensure continuing education courses are delivered by accredited providers and there should be a consistent, transparent process for those providers to obtain course accreditation.

Finally, penalties for non-compliance with licensing or continuing education requirements should be consistent across all jurisdictions.

4. ***Should there be minimum education and/or experience requirements before individuals enter the insurance industry? (e.g. high school/CEGEP, work experience, etc.?***

No, the current licensing requirements are sufficient for entry into the industry.

5. ***What skills, knowledge and/or competencies should a broker or agent have?***

- Must act with integrity, competence, and in utmost good faith
- Time management skills
- Strong communication skills
- Comprehensive knowledge of products
- Understanding of the claims process and their role in it
- Objective, inquisitive, tenacious, professional, ethical

6. ***How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate.***

The value to OMIA's group of companies is limited only insofar as we do not write across the country. We would definitely see value in there being a consistent approach to licensing and CE in this province. Depending on the final course of action taken, the value to the industry could be significant in terms of streamlining and cost-savings. The biggest winners would be the customers as they would be able to choose between two similarly accredited distribution channels.

7. ***What challenges do you see in harmonizing educational qualifications?***

We perceive a challenge relating to older, more-seasoned agents who may feel that their experience combined with their own professional self-development precludes the need for ongoing mandatory education.

Will there be an opportunity for long-term agents to be "grandfathered" in? Could the regulations exempt agents licensed before a particular date e.g. deem them to have equivalent education?

Failing that, will there be "optional equivalency period" as was the case with the under LLQP? We understand that during that Optional Equivalency Period, regulators offered individuals looking to obtain a life licence the choice of completing either the LLQP course and examination or the existing Level I and Level II examinations. A similar approach could be implemented giving general insurance agents extra time to complete their CE requirements.

Need accredited providers of continuing education.

There will be an increased cost for agents who did not previously require CE credits

Different rules across the country (for example, how auto insurance is sold) could make it difficult to be consistent and achieve harmonization

Brokers require some education and certification on the unique elements of the broker as an independent businessperson. This would not likely be required for agents, so this is another area of divergence.

8. ***Are there aspects of the 2016 Life Licence Qualification Program (LLQP) that could be applied to general insurance education? Which would or would not be applicable?***

Generally, fashioning change on past successful models is a good starting point. Our review of the LLQP suggested that there are a number of areas that could be applicable to general insurance education-namely, the standardization of curriculum and of licensing requirements, a uniform examination process, common pass scores, and the use of accredited course providers. We would suggest that the Continuing Education and Accreditation process should not be an administratively onerous or expensive process. The value lies in the education itself, not in cumbersome bureaucratic structures and tracking. We believe the work dome by RIBO in Ontario has struck the appropriate balance.

9. ***How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g. frequency, touchpoints, means of engagement)?***

We encourage you to continue to widely communicate with insurer stakeholders. Using trade-based media does provide good opportunity for associations and member companies to keep updated on CISRO initiatives. We also welcome invitations to participate on consultation groups and to attend public forums where CISRO issues are discussed. We believe that an integrated communication plan including all of these types

of formats is effective. We also can confirm that meetings with individual regulators on a cooperative and pro-active basis (as opposed to on a crisis response basis) are extremely effective in building a long-term appreciation of each other's perspectives.

Thank you for including OMIA in this important consultation. We look forward to further opportunities for input and dialogue as this review progresses. In the meantime, should you require further information from OMIA, or wish to meet with representatives of our Association at any time, please contact jtaylor@omia.com.

Yours Truly,



John L. Taylor BBA, FCIP, FCLA, CHRL
President

From: Helene Wood <helene@aieacademy.ca>
Sent: Friday, August 31, 2018 10:01 AM
To: CISRO-OCRA
Subject: RE: Invitation to Comment / Soumission de commentaires: Licensing qualification requirements for general insurance agents & brokers / Exigences de qualification pour les agents & courtiers en assurance de dommages
Attachments: Cisro Survey.pdf

Good Morning,
Hope this finds you well. Please find attached my thoughts on this very important survey.
Thank you so much for allowing me this great opportunity to participate!
Please let me know if you have any questions of any kind!!
Have a great day!!
Helene Wood, CIP
President
Advance Insurance Educational Services Inc.
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1. As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like? There should be more than just the general license that is required. The license merely lets candidates work in the industry but it does not focus on what is required to actually do the job.

2. What works well within the current frameworks? The multiple choice exam for most seems to work well. With that said, the current frameworks are very challenging at the moment, it is not clear what is expected of the writer.

3. How could the current frameworks be improved? Make the categories less vague. Instead of just saying technical, elaborate technical what? Technical auto, technical property, etc.…be more specific on what you want to know in the exam. The questions on the exam should be clear as to what it is wanting. Be clear in the structure of the question. I understand distractors are necessary in the multiple choice exam however if the distractors cause confusion then it is really pointless when determining if the writer knows the material or not. In other exams for example the CIP exams the question is structured to the materials that are available or presented. I feel this should be the case on the licensing exam. Test what is important for the writer to know in their jobs. Focus on the technical side, auto, property, liability etc. Although the industry organizations are important for the writer to be aware of, it is not important for the job that they do. Also if a candidate is not successful on their attempt help them by broadening out where they did not do well. Again elaborate for example, technical what area.

4. Should there be minimum education and/or experience requirements before individuals enter the insurance industry (e.g., high school/CEGEP, work experience, etc.)? I don't think that is a minimum education requirement is necessary. People all learn in different ways. Some people are book smart, some people are street smart. Book smart does not always equate to understanding what they are learning. As being a broker/agent is a sales job, I feel some experience as a sales person would be helpful as insurance is a product that does need to be sold.

5. What skills, knowledge and/or competencies should a broker or agent have? To be a competent broker/agent they should obtain in their first year, a customer service seminar, hands on real life auto & property training which would include all the coverages, exclusions, limitations of the real world not the theory world.

6. How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate. I feel it would be valuable to my organization to harmonize the educational qualifications between jurisdictions. I have spent a lot of time structuring my company to meet and exceed the needs of the people coming into the industry. We have added customers services seminars, hands on seminars on what they should be asking clients and how to respond to the answers, along with sales seminars in both our programs to round out the knowledge of the participants so that they can hit the ground running and be comfortable and competent in their roles.

7. What challenges do you see in harmonizing educational qualifications? Across the provinces auto is different I can see this perhaps being a challenge in harmonizing educational qualifications. Other than that I feel this would be a good move.

8. In 2016, CISRO members introduced an updated version of the Life Licence Qualification Program for life insurance licensees (LLQP). The program included the following features:

- Completion of a uniform Competency Profile,
- A common Curriculum,
- Standardized course material,
- The use of Accredited Course Providers to deliver the course material
- Certification of successful completion of the study course by Accredited Course Providers.
- A uniform regulator-delivered examination.
- A modular approach to the course material and examination
- An open-book examination

Are there aspects of this licensing qualification regime that could be applied to general insurance education? Which would or would not be applicable? I love the way the LLQP is structured. It is a clear, consistent way of testing. I feel all except the open book exam would be awesome to the general world. This way it is clear on what the writer will be examined on and as a course provider it would greatly assist when developing my material for presentation. I do not feel the open book exam would work as there is so much material that it could cause the writer to become frustrated and that would affect exam results.

9. How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g., frequency, touchpoints, means of engagement)? I would suggest that stakeholders are kept in the loop monthly to advise where we are at, what is still needed and what does the timeline look like to roll this out. This can be handled via email until it is close to completion and then in person to get everyone's feed back before it is finalized in person. Sometimes it is easier and better to do this in person to ensure everyone is on the same page.

10. Please provide any other comments you wish to share with the Committee that you believe are relevant to this review. Our industry is in desperate need of good qualifies agents/ brokers. It is imperative that a fair, passable exam is available. I fully understand that a big part of passing the exam rests with the writer, however if the writer is prepared on what the instructor "thinks" is on the exam rather than "know" what is on the exam this impedes success rates. I am not suggesting teaching to the exam, I am suggesting that it is narrowed down to ensure we are not wasting our time on what is not really important. It is important that candidates in our industry are prepared fully and properly for what they will be facing in their day to day jobs.

Next Steps

The Committee will consolidate the results of this preliminary consultation and present them to CISRO members in Fall 2018. All stakeholder comments will be considered as the Committee develops its recommendations, and it will continue to engage stakeholders and provide updates as the project progresses.

How to Provide Comments

All comments should be submitted to cisro-ocra@fsco.gov.on.ca by **Friday, August 31, 2018**. CISRO may make the submissions received publicly available. If you indicate that you do not want your submission or specific parts of your submission to be made public, we will treat the submission, or the designated parts, as confidential to the limited extent permitted by law.

(CRNQAD) des Organismes canadiens de réglementation en assurance (OCRA)

CÉGEP ⇩	1. Comme indiqué dans l'annexe, les juridictions ont adopté des approches différentes en matière de formation qualifiante. Selon vous, à quoi devraient ressembler les exigences de qualification pour la certification en assurance de dommages?	2. Qu'est-ce qui fonctionne bien dans les cadres actuels?	3. Comment les cadres actuels pourraient-ils être améliorés?	4. Devrait-il y avoir des exigences minimales en matière de scolarité ou d'expérience avant que les futurs représentants fassent leur entrée en carrière dans l'industrie de l'assurance (ex. études secondaires/CEGEP, expérience de travail, etc.)?	5. Quelles aptitudes, connaissances ou compétences un courtier ou un agent devrait-il posséder?	6. Quels seraient les bénéfices pour votre organisation ou pour l'industrie d'harmoniser les exigences de qualifications entre les juridictions? Veuillez élaborer	7. Quels défis l'harmonisation des exigences de qualifications comporte-t-elle selon vous?	8. En 2016, les membres des OCRA ont présenté un programme de qualification en assurance de personne (PQAP) actualisé. Ce programme présente les caractéristiques suivantes : • Élaboration d'un profil de compétences uniforme; • Un curriculum d'évaluation commun; • Du matériel de préparation aux examens standardisé; • Offre de formation et distribution du matériel de préparation par le biais de prestataires de cours accrédités; • Attestation de réussite du cours par les prestataires de cours accrédités; • Examen uniforme administré par le régulateur; • Approche modulaire pour le matériel de préparation et l'examen; • Examen à livre ouvert. Y a-t-il des aspects de ces normes de qualification qui pourraient être appliqués à la formation en assurance de dommages? Quel aspect pourrait ou ne pourrait pas être utilisé?	9. Comment suggéreriez-vous que le Comité consulte les parties prenantes au fur et à mesure que la révision progresse (ex. : fréquence, jalons importants, canaux de communication)?	10. Veuillez fournir tout autre commentaire que vous souhaitez partager avec le Comité et que vous jugez pertinent à cette révision.
1	Le seuil d'exigence minimal devrait être le niveau collégial (AEC ou DEC) pour accéder aux examens de l'AMF.	Les étudiants qui suivre l'AEC en assurance de dommages sont bien préparés pour les examens de l'AMF. De plus pour notre part la formation se donne en ligne de façon synchrone ce qui est très apprécié des étudiants. Finalement la procédure de vérification des connaissances par des examens c'est très bien.	Reconnaître la polyvalence (agents sinistres,experts).	Voir question 1	Facilité à communiquer, dynamise, souci du travail bien fait, bon négociateur, être à l'écoute, polyvalence, sens du bon jugement, bonne capacité d'analyse, Bonne connaissance de la langue française, bon vendeur, bonne connaissance de l'informatique.	Pas vraiment de bénéfice, vue que les lois et règlement du Québec sont différents; En plus les gens qui termine AEC doivent passer les examens de l'AMF avant d'avoir leur permis de travail en assurance	Chaque régions à ces particularités, exemple la langue. Probablement que les exigences seraient nivelés par le bas donc vraiment pas une bonne chose.	Ces caractéristiques pourraient être applicables en assurance de dommage si on adapte le contenu à notre programme.	Il serait intéressant d'être informer et consulter régulièrement par courriels et par des tables de concertations.Contrairement au processus du PQAP où nous avons seulement été informé du résultat, nous souhaitons recevoir des informations régulièrement et que les documents nous soient soumis pour commentaires.	Dans le futur, les tâches inhérentes à la fonction de travail de courtier, d'agent ou d'expert en sinistre vont se complexifier. Donc, il est important d'avoir une formation adéquate pour pouvoir s'adapter aux nouvelles réalités
2	Le fait est que l'AEC en Assurance de dommage offre des cours basés sur les compétences directement liées au milieu du travail et aux examens de l'AMF. Cette réalité permet aux étudiants d'être bien préparés pour la passation desdits et examens et par conséquent, l'obtention de leur permis.	La séquence des cours pourrait être allégée pour permettre à la clientèle adulte un retour aux études plus graduel. Cependant, si on souhaite que les étudiants fassent leur retour au marché du travail dans des délais raisonnables et qu'ils puissent débuter leur stage dans les organisations dans les délais les plus courts après la fin de leur formation, l'allègement s'avère parfois difficile.	La réussite minimale d'un secondaire 4 pour être admis à l'AEC en Assurance de dommages. Un niveau de qualité du français minimal pour viser des communications claires et efficaces. Principalement parce que c'est un domaine où les termes légaux sont importants et que la qualité de la communication est essentielle soit à l'écrit ou à l'oral.	Les qualités essentielles sont d'avoir une bonne écoute active, avoir un bon sens du service à la clientèle, bon communicateur, bonne capacité d'analyse, bon jugement, sens de l'observation.	Pour permettre aux étudiants la passation des examens de l'AMF, la formation minimale requise devrait être l'AEC en Assurance de dommages. En plus de la réussite de ces examens, l'obtention du diplôme de l'AEC en Assurance de dommages, assure l'industrie d'embaucher du personnel dont l'acquisition des compétences exigées pour travailler dans ce milieu a été réussi.	Bien que je suis dans l'impossibilité de les identifier en détail, je dirais que plusieurs. Dès le départ, la différence des systèmes scolaires entre les provinces. Il faut non seulement uniformiser le profil de sortie et exiger la réussite des examens de l'organisme régulateur, soit l'équivalent de l'AMF dans les autres provinces, mais tout comme pour technicien comptable, uniformiser la scolarité de base requise avant la passation desdits examens. En partant du principe que les assurances de dommages ont les mêmes objectifs, et ce, peu importe le lieu de résidence, il est anormal que le cheminement qui mène une personne à la pratique soit aussi différent d'une province à une autre. Dans une ère où la pénurie de main-d'œuvre est une réalité qui empêche la croissance de plusieurs organisations, l'uniformisation des exigences s'inscrit également dans un processus de facilitation de l'embauche de personnel car les exigences de diplomation et d'obtention de la certification par l'organisme régulateur seraient le même à travers le pays. De plus, l'exigence d'une formation de base ajoute du sérieux à cette profession. L'industrie travaille et continue à travailler pour s'éloigner de l'image du vendeur d'assurance qui possède les mêmes compétences qu'un vendeur d'un bien de consommation qui n'exige pas les mêmes connaissances légales ou techniques, dixit le vendeur d'aspirateur.	L'ensemble de ces caractéristiques s'appliquent aux Assurance de dommages sauf pour l'uniformité des compétences car les assurances au niveau particulier et en entreprise ne requièrent pas les mêmes connaissances. Il faudrait également ajuster les exigences en fonction de la fonction que la personne souhaite exercer dans le domaine.	La consultation, suivi de la progression ou autre par le biais de messages écrits, permet de la souplesse. Selon la durée des travaux, un suivi aux 3-4 mois serait approprié.	/	/

(CRNQAD) des Organismes canadiens de réglementation en assurance (OCRA)

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3	As an English College and educational institution, we want the programs to be accessible to as many people as possible. In Continuing Education , we aim to train people who wish to get on the labour market as quickly as possible and to help employers find suitable candidates trained for their needs. We offer the Damage Insurance AEC program. Our provincial regulatory body is the AMF and there books are the main source of our competency-based teaching. The books are not all available in English and are quite theoretical.	We have noticed that students need to have completed at least a high school diploma and even a Cegep diploma to really grasp the contents and complete the program in strong academic standing in the time allotted.	It is our observations that some students struggle with the content of the course material, especially if they have not pursued post-secondary schooling. Many new immigrants to our province have been accepted in the program. We noticed they often struggled since the language is a barrier for them, especially when it is not their first, second language. They also struggle with the culture and the transferable skills. Therefore, we would like to see that a minimum be high school diploma remain but a College diploma to preferred to enter the program.	What can be improved? Minimum education /experience to enter the program hence enter the insurance industry. In order for the programs to be attractive, a mandatory minimum requirement of an AEC or College Diploma should be required to write the provincial exam and enter the field.	Module could be formed to improve the retention. For example, have a program that offers several modules so the participant can complete a module and gain the workforce quicker , especially for agents. Companies hire them and they can continue to be trained on specific company products. Module 1 Personal and auto insurance and liability for agents/brokers Module 2 Commercial insurance and liability for agents/brokers Module 3 Claims Insurance (must have completed module 1 & 2) This would help colleges to attract and retain participants in its programs and graduate more often . This would help industry hire more often instead of having to wait 14 months for the participants to get through the full AEC program. As for the provincial exam in QC, I believe the industry players should support a minimum College education in order to have access to the licensing exams. It creates a win-win situation. If not Colleges struggle and the responsibility lies on the employers to develop training programs to prepare candidates to the exam and often it is too quick and not enough in depth.	There should be also more emphasis on strong spoken communication skills. It should be a pre-requisite to apply. This industry is a service industry and in Quebec, we need both French and English spoken languages and none is officially incorporated in the English programs. This may be difficult to do between provinces, to harmonize between provinces since we have different realities, but one thing is common and that is customer service, by telephone mainly. Transactions are completed often over the phone or online. Strong computer skills and being able to multitask are also very important skills in the insurance business.	One last thing I would like to add, is that the industry must work more closely with its educational institutions and engage in discussions in order to help better prepare the upcoming workforce and to invest in the next generation of workers. It would be important to expect and demand a high level of education for their workers. A minimum College diploma should be the standard. It will produce, in the long run, more productive , knowledgeable employees who can serve the clients and keep their client. If industry is part of the framework and discussion with those that train , they will be able to influence the curriculum and have access to employees that meet their need as well. Insurance Industries must believe in investing in the future because there will not be enough workers to fill the jobs, and big turnover is not a good thing for companies.			I want to thank the committee for opening the discussion and asking us for our opinion and comments. I believe this is only helpful and can lead to better regulatory organization in the industry. I believe this is a viable field of work but we need to better inform the population, parents and students about this viable industry. Regulation is important and needed but we need to constantly revise, improve and adjust to be more flexible. This way we will be able to better attract and retain and employers will have access to well trained workforce.
4	La formation devrait prendre en compte les compétences requises pour effectuer adéquatement l'entièreté de la fonction de travail. Dans un contexte où la fonction de travail, avec la venue de l'utilisation de l'intelligence artificielle aura à gérer des dossiers beaucoup plus complexes de façon récurrente.	L'AEC étant un programme réseau dispensé intégralement par les Cégeps garantit une transférabilité et une acquisition intégrale des compétences inhérentes à la fonction de travail. De plus, la Coalition pour la promotion de la formation en assurance de dommages permet, par ses actions, aux compagnies d'assurance d'atteindre une vision commune des tâches des personnes travaillant dans le domaine.	Ils pourraient rendre l'AEC obligatoire à l'accès aux permis.	L'AEC serait suffisante. L'AEC peut être obtenu au moyen de la reconnaissance des acquis et des compétences (RAC) ce qui veut dire que les formations effectuées par les compagnies d'assurance pourraient permettre à la personne de faire les évaluations par le billet de la (RAC) sans suivre les cours.	Celles qui permettront aux étudiants d'effectuer les activités de travail suivantes : la recommandation de produits d'assurance à un particulier; • la recommandation de produits d'assurance à une entreprise; • l'analyse de risques et de demandes d'assurance à des fins d'acceptation ou de refus; • le règlement et le suivi des réclamations. Les compétences sont détaillées dans le programme d'AEC. Ref. :AEC.LCA.6A_2015	Il n'y en a aucun considérant que les compétences nécessaires à la fonction de travail d'expert en sinistre ne sont pas prévues dans le projet.	Les lois et responsabilités en vigueur dans la province de Québec doivent être respectées (Loi 141, Ministère de l'éducation et de l'enseignement supérieur, etc.) De plus, la qualification ne doit pas uniquement permettre de délivrer un permis d'exercice mais d'assurer que la personne est en mesure d'effectuer le travail.	Ne sais pas, ne connait pas le programme en assurance de personnes	Considérant qu'au Québec le Ministère de l'Éducation et de l'Enseignement supérieur a juridiction en cette matière, ces travaux devraient leur être confiés. Ils pourraient à ce moment être réalisé en collaboration avec les Cégeps et l'industrie de l'assurance.	Il est important ici de prendre en compte la réalité de la fonction de travail actuel et en devenir. Dans le futur les tâches inhérentes à la fonction de travail de courtier, d'agent ou d'expert en sinistre vont se complexifier. Si les personnes ne possèdent pas les compétences à la base, ils ne pourront s'adapter aux nouvelles réalités.

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5	Les exigences de qualification pour la certification en assurance de dommages devraient être orientées d'abord et avant tout pour la protection du public. Une véritable formation professionnelle devrait être exigée de manière à garantir la protection du public, mais également une prestation professionnelle répondant aux plus hauts standards. Ceci aura en plus comme effet d'améliorer la stabilité et la rentabilité des portefeuilles d'assurance de même que de rehausser l'image de l'industrie.	De notre point de vue, au Québec le fonctionnement du système de certification semble bien fonctionner en général.	Les cadres actuels au Québec sont bons. Le seul point qui pourrait être amélioré serait la formation minimale.	Afin d'améliorer la protection du public, la stabilité des portefeuilles d'assurance et leur rentabilité, une formation minimale spécialisée de niveau collégiale (technique) devrait être exigée avant la passation des examens réglementaires.	Droit général, droit des assurances, déontologie, produits d'assurance (automobile, particuliers, entreprises, cautionnement), règlement de sinistres, gestion de risques, souscription, normes de construction et de prévention.	Il n'y aurait aucun bénéfice à l'harmonisation pour notre organisation. Pour l'industrie, l'harmonisation aurait pour effet de faciliter la mobilité de la main d'œuvre de même que qu'une simplicité accrut dans la gestion des entreprises œuvrant dans différentes juridictions.	L'adaptation pourra être plus difficile pour les juridictions ayant des exigences moins contraignantes.	En général, les caractéristiques du PQAP pourraient s'appliquer en assurance de dommages. Une formation spécialisée devrait cependant être exigée (de même qu'en assurance de personnes) afin d'améliorer la protection du public et la rentabilité de l'industrie.	Via l'Autorité des marchés financiers qui peut communiquer aux prestataires de formation.	/
6	Pour s'assurer d'une main d'œuvre de qualité et compétente, le passage dans l'AEC est un atout majeur. Cette formation prépare adéquatement l'étudiant aux examens de l'AMF. Le taux de réussite à ces examens s'avère supérieur à ceux qui se préparent individuellement.	Le consortium favorise une formation de qualité et plus standardisée (contenu de cours, préparation des examens de l'AMF).	Une évaluation du programme avec l'industrie devrait se faire plus souvent pour s'assurer que les contenus soient toujours pertinents et à jour.	Avoir un diplôme collégial adapté au besoin de l'industrie.	Bon communicateur, habileté en vente, sens de l'écoute, bonne capacité d'analyse, bonne capacité de négociation, bonne relation interpersonnelle, aimer travailler avec le public, capacité à travailler en équipe et naturellement d'excellentes connaissances en assurance de dommages.	Assure une polyvalence entre province. Donc, les employés deviennent mobiles. C'est un aspect non négligeable pour les employeurs et les employés. Uniformiser les salaires.	Que les personnes acceptent de travailler pour la qualité de l'industrie et non pour leur intérêt personnel et institutionnel.	Il y a lieu de faire un arrimage entre ce modèle et le nôtre afin de développer un modèle qui répondait au besoin de l'industrie et s'assurer que les personnes reposent une formation de qualité et qualifiante. Il ne faut surtout pas niveler par le bas.	Rencontres en présentielles ou à distance selon l'avancement du projet. Chaque étape importante doit être endossée par l'ensemble des parties prenantes. Il faut encourager le travail de collaboration et éviter le travail individuel.	Nous souhaitons que tout le travail et l'expertise des collèges qui offrent le programme an assurance de dommages soient pris en considération. Cela serait dommage de ne pas bénéficier de toute cette expérience.

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7	Le seuil d'exigence minimal devrait être le niveau collégial (AEC ou DEC) pour accéder aux examens de l'AMF.	En suivant un programme collégial, les étudiants sont bien préparés pour les examens de l'AMF. Ils ont égalementdéveloppé les compétences essentielles au marché du travail et ayant été relevées comme indispensables par lesemployeurs en assurances, notamment au niveau des attitudes professionnelles, de la communication et de lacapacité d'analyse).	Reconnaître la polyvalence (agents sinistres,experts).	(voir question 1) Les études collégiales apportent une valeur ajoutée puisque les étudiants en assurances ontdéveloppés les compétences nécessaires à l'exercice de la profession. Les employeurs reconnaissent le niveaud'expertise des étudiants finissants comparativement aux individus n'ayant pas fait de formation avant l'obtentiondu permis (sec 5 + 3 ans). Les diplômés sont plus performant et progresse plus rapidement dans leur fonction detravail. Cela exige moins de formation à l'embauche pour l'employeur. Aussi ils sont habiletés à intervenir dansdes situations plus complexes ayant été mis en situation authentique dans le cadre de leur programme d'étudescollégial.	Les compétences requises sont principalement: - la promotion et la vente de produits d'assurance et de produits financiers dans un réseau direct ou indirect de distribution (courtage); - les activités de représentation auprès de la clientèle; - l'analyse des besoins et des objectifs de la cliente ou du client; - l'élaboration de programmes ou de recommandations ayant trait aux assurances ou aux services financiers; - l'analyse de risques et de demandes d'assurance à des fins d'acceptation ou de refus; le règlement et le suivi des réclamations. Les habiletés et les attitudes requises sont principalement : • évaluer la qualité d'un risque ; • faire preuve de polyvalence ; • appliquer les techniques de communication • rédiger des correspondances d'affaires et l'écriture de notes concises et lisibles ; • rédiger des rapports techniques, d'étapes d'enquête et de réclamation • maîtriser les techniques d'enquête ; • évaluer des pertes, lire un rapport, connaître le calcul Boeckh ; • démontrer un esprit d'analyse et de synthèse ; • faire preuve de bon jugement ; • maîtriser les touches sur le clavier, les applications Windows, Internet (courriel) et l'utilisation d'un logiciel maison.	Faible, considérant notamment que les lois et règlements du Québec sont différents	Risque d'un nivellement par le bas en diminuant les standards de formations, ce qui aurait pour effet de dévaloriser la profession (image d'une profession peu importante).	Il s'agit plutôt des étapes menant à la passation d'examens d'entrée (acquisition de connaissances) et non pas d'un programme de formation qui permet de développer les compétences essentielles à l'exercice de la profession.	Contrairement au processus du PQAP où nous avons seulement été informé du résultat, nous souhaitons recevoir des informations régulièrement et que les documents nous soient soumis pour commentaires.	Attention au message qu'on envoi dans la population sur la profession : qualifications du personnel

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8	Elles devraient comporter une formation post secondaire complète et l'obligation de réussir des examens de contrôle technique en droit et déontologie minimalement.	Au niveau de la formation des agents et courtiers, dans le cas où ces professionnels possèdent une AEC, les commentaires des employeurs mentionnent que ceux-ci ont une formation complète pour intégrer le marché du travail et qu'il voit une différence comparativement à une personne qui n'a pas suivi une formation complète. De plus, le finissant de L'AEC prouve le sérieux de sa démarche, sa détermination et sa passion du domaine en étant aux études durant 12 mois. Il acquiert de plus un bagage de connaissances techniques dans le domaine de l'assurance et de la déontologie, mais également dans d'autres sphères qui lui seront utiles tout au long de sa carrière (techniques de ventes, technique d'entrevue, anglais, mécanique du bâtiment, etc.). Il est perçu par l'employeur comme une main-d'œuvre qualifiée et extrêmement bien formée.	En exigeant une formation postsecondaire en assurance obligatoirement avant d'entrer sur le marché du travail à titre d'agent ou courtier en assurance de dommages.	Une formation minimale de niveau postsecondaire serait l'idéal dans le secteur de l'assurance afin de former des gens professionnels ayant les connaissances dans ce secteur. Une formation postsecondaire serait l'idéal. Cette précédente phrase est un souhait idéal. Par contre, pour être réaliste et combler la pénurie de main-d'œuvre dans ce secteur, un programme de formation incluant les compétences nécessaires devrait être obligatoire. De plus, un examen de certification par une autorité devrait être exigé afin de s'assurer que les futurs agents et courtiers possèdent les connaissances pour bien répondre à la clientèle..	Souci d'offrir un service à la clientèle de qualité, dynamisme, détermination, bon communicateur, être à l'écoute des besoins du client, avoir des aptitudes en négociation. Connaissances : Maîtrise de l'anglais, compétences techniques du domaine, vente et expérience clients, déontologie, informatique.	Au niveau des établissements de formation, la majorité des provinces exigent une formation minimale. Ceci pourrait peut-être assurer une continuité de la formation que se soit crédité ou non. Pour les entreprises, il pourrait avoir une mobilité de la main-d'oeuvre.	Avoir un consensus entre les provinces et modifier les modes d'opération des différentes autorités compétentes.	Tous ces aspects pourraient être applicables en prenant en considération des adaptations pour l'assurance de dommages. Il ne faudrait pas faire un copier-coller de l'assurance de personnes. Si des consultations continuent, les intervenants pourront réagir sur ces différents éléments.	Il serait intéressant d'être consulté au moins tous les trois mois afin que nous puissions réagir avant que les décisions finales soient prises et qu'il n'y ait plus de retour en arrière. Cette nouvelle règlementation aura sûrement des impacts sur l'offre de formation que nous offrons présentement. Afin d'avoir une vision globale et juste, il est important que nous soyons informés et déjà pouvoir commencer des réflexions à l'intérieur de nos organisations. Il serait important que les directions de la formation continue puissent faire partie des réflexions sans oublier les conseillers pédagogiques qui travaillent au quotidien avec ce programme de formation. La Fédération des cégeps collabore-t-elle avec la coalition en Assurance de dommages? Ensemble, ces deux partenaires seraient de bons partenaires afin de rejoindre les personnes du monde de l'éducation.	L'assurance est très mal comprise chez le consommateur. C'est un produit qui ne ressemble à aucun autre. Le conseiller compétent et consciencieux demeurera toujours d'une importance capitale. Le consommateur mérite d'être protégé en étant conseillé par un courtier ou un agent qui maitrise parfaitement la matière. Au lieu de chercher à amoindrir les exigences de formation, l'industrie gagnerait à accentuer les exigences de formation.

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9	Réussite des examens : droits et lois, assurance des biens des particuliers, assurance automobile et assurance des biens et responsabilité civile des entreprises.	La formation de l'AEC et la réussite des 4 examens de l'AMF font en sorte que les nouveaux courtiers ont les compétences et connaissances nécessaires à l'exercice de leur profession. De ce fait, les candidats qui n'ont pas ces compétences ou connaissances ne peuvent exercer, ce qui, de fait, protège davantage le consommateur.	Qu'il y ait un échange entre l'AMF, les enseignants et l'industrie pour s'assurer d'être à la fine pointe suite aux changements fréquents afin que les futurs candidats soient préparés pour l'industriel et non pour l'AMF.	Je crois que les exigences minimales actuelles de l'AMF sont adéquates, les voici : • Diplôme d'études collégiales du Québec ; • Diplôme d'études collégiales (DEC) Conseil en assurances et en services financiers ; • Attestation d'études collégiales en assurance de dommages reconnue dans une entente intervenue à cette fin entre l'Autorité et un établissement d'enseignement collégial du Québec ; • Deux certificats universitaires de 30 crédits chacun, délivrés par une université canadienne ; • Baccalauréat, diplôme d'études supérieures spécialisées, maîtrise ou doctorat délivré par une université canadienne ; • Décision rendue par l'Autorité attestant le niveau d'études équivalant au diplôme d'études collégiales ; • Évaluation comparative des études effectuées hors du Québec délivrée par le ministère de l'Immigration, de la Diversité et de l'Inclusion, confirmant un résultat comparable au diplôme d'études collégiales ou à un diplôme d'études supérieures ; • Diplôme d'études secondaires ou niveau d'études équivalent et décision rendue par l'Autorité attestant l'occupation d'un emploi à temps plein pendant au moins trois ans. Si je peux me permettre, le candidat ayant obtenu avec succès l'AEC est mieux reconnu dans l'industrie que celui qui répond aux exigences minimales et qui de façon autodidacte réussit les examens de l'AMF. La formation est plus complète et les étudiants acquièrent des connaissances supplémentaires (ex. : normes de prévention, communication et ventes, anglais, analyse de risques)	Aptitudes : service à la clientèle, être à l'aise avec les systèmes informatiques et courriels. Avoir de l'entregent et être en mesure de bien communiquer, esprit d'équipe, capacité d'écoute, esprit d'analyse et bon jugement.	Étant donné que chaque province et territoire a une juridiction qui lui est propre, l'harmonisation des exigences de qualifications ne peut qu'être limitée. L'agent ou le courtier voulant exercer dans une autre province devra de toute façon acquérir des connaissances sur la juridiction de celle-ci.	D'avoir les mêmes exigences minimales pour l'entrée en carrière; De statuer sur les différents niveaux (ce que nous au Québec nous n'avons pas ainsi que d'autres provinces) Nos systèmes juridiques sont différents d'une province à l'autre (Québec = Code civil, autres provinces = Common Law). De faire accepter à l'industrie une manière différente pour l'entrée en carrière.	Aspect qui pourrait être utilisé : du matériel de préparation aux examens standardisé. Aspect qui ne pourrait être utilisé : un curriculum d'évaluation commun.	Par le biais d'infolettres périodiquement transmises à ces parties prenantes (par courriel ou autre).	-

CÉGEP ⇩	1. Comme indiqué dans l'annexe, les juridictions ont adopté des approches différentes en matière de formation qualifiante. Selon vous, à quoi devraient ressembler les exigences de qualification pour la certification en assurance de dommages?	2. Qu'est-ce qui fonctionne bien dans les cadres actuels?	3. Comment les cadres actuels pourraient-ils être améliorés?	4. Devrait-il y avoir des exigences minimales en matière de scolarité ou d'expérience avant que les futurs représentants fassent leur entrée en carrière dans l'industrie de l'assurance (ex. études secondaires/CEGEP, expérience de travail, etc.)?	5. Quelles aptitudes, connaissances ou compétences un courtier ou un agent devrait-il posséder?	6. Quels seraient les bénéfices pour votre organisation ou pour l'industrie d'harmoniser les exigences de qualifications entre les juridictions? Veuillez élaborer	7. Quels défis l'harmonisation des exigences de qualifications comporte-t-elle selon vous?	8. En 2016, les membres des OCRA ont présenté un programme de qualification en assurance de personne (PQAP) actualisé. Ce programme présente les caractéristiques suivantes : • Élaboration d'un profil de compétences uniforme; • Un curriculum d'évaluation commun; • Du matériel de préparation aux examens standardisé; • Offre de formation et distribution du matériel de préparation par le biais de prestataires de cours accrédités; • Attestation de réussite du cours par les prestataires de cours accrédités; • Examen uniforme administré par le régulateur; • Approche modulaire pour le matériel de préparation et l'examen; • Examen à livre ouvert. Y a-t-il des aspects de ces normes de qualification qui pourraient être appliqués à la formation en assurance de dommages? Quel aspect pourrait ou ne pourrait pas être utilisé?	9. Comment suggéreriez-vous que le Comité consulte les parties prenantes au fur et à mesure que la révision progresse (ex. : fréquence, jalons importants, canaux de communication)?	10. Veuillez fournir tout autre commentaire que vous souhaitez partager avec le Comité et que vous jugez pertinent à cette révision.
10	Tenant compte du fait que les qualifications d'un représentant en assurance de dommages se bonifient avec les années d'expérience de travail « sur le terrain », par la multitude de cas et de situation traités, les exigences de qualification sont forcément établies sur les connaissances théoriques de base en assurance de dommages. Il est pratiquement impossible de pouvoir fournir à l'apprenant, un environnement pratique équivalent au milieu de travail. Cependant, il est essentiel que les connaissances théoriques de base qui sont, entre autres, les accises et dispositions légales de l'assurance de dommages et les formulaires de base, soient maîtrisées par le candidat au titre.	Le système n'est pas complètement défaillant mais il y a beaucoup de place à l'amélioration. La procédure de vérification des connaissances par des examens est correcte.	La majorité des formulaires en assurance de dommages sont des textes rédigés en langage légal. Ils sont équivalents à des textes de loi. Il appert que pour comprendre un texte légal à sa première lecture il faut un minimum de 17 années de scolarité. La formation de base pré-requise devrait être plus élevée. Présentement, un postulant au titre doit faire la preuve de 13 ans de scolarité. Le niveau de difficulté des examens de vérification des connaissances pourrait être plus élevé et inclure des questions pratiques (étude de cas, par exemple).	Oui absolument, voir la réponse à la question précédente.	Le représentant doit bien connaître les dispositions légales en assurance de dommages, les formulaires « types », les protections offertes. Cependant, il doit être bon vulgarisateur. Il doit à la fois pouvoir analyser et synthétiser, établir des priorités et être bien organisé. Rigoureux et consciencieux, il aime travailler avec les gens, être empathique et excellent communicateur.	Pas de réel bénéfice à l'harmonisation des exigences de qualifications puisque le contenu des formations ne pourra pas être le même pour l'ensemble du pays. La formation dispensée au Québec continuera de ne servir que le Québec et il en va de même pour toutes les provinces ou territoire qui ont un cadre légal différent des autres en assurance de dommages.	Les aptitudes, connaissances et compétences des représentants en assurance de dommages sont les mêmes quant à la profession elle-même. Ce sont les bases légales et les contextes socio-économiques qui sont différents d'une province à l'autre. Le contenu des formations ne pourra être le même mais les méthodes de formation, d'évaluation et de certification elles pourraient être les mêmes.	Tout pourrait être utilisé quant au format, aux jalons, aux compétences professionnelles mais pas au contenu en raison de trop grandes différences entre les régimes des provinces et territoires.	La consultation en cours de processus pourrait éviter de l'engager dans une tangente inappropriée. Cependant, ladite consultation risque d'alourdir le processus. Sans consulter, demander l'avis, il pourrait s'agir d'informer par courriel (infolettres) au début et à la fin de chacune des étapes. La consultation comme tel ne devrait être envisageable qu'en cas d'impasse dans le processus.	Au Québec, il n'existe pas de niveau de certification, comme en Alberta ou en Colombie Britannique. Il s'agit d'une excellente façon de valider et d'évaluer l'évolution du représentant dans l'apprentissage et le perfectionnement de ses compétences. Partant de la prémisse qu'il n'y a pas meilleure manière d'acquérir et d'améliorer les compétences que par la pratique de la profession, les niveaux de certification permettent de réduire les erreurs professionnelles et de protéger plus adéquatement les consommateurs.

(CRNQAD) des Organismes canadiens de réglementation en assurance (OCRA)

CÉGEP ⇩	1. Comme indiqué dans l'annexe, les juridictions ont adopté des approches différentes en matière de formation qualifiante. Selon vous, à quoi devraient ressembler les exigences de qualification pour la certification en assurance de dommages?	2. Qu'est-ce qui fonctionne bien dans les cadres actuels?	3. Comment les cadres actuels pourraient-ils être améliorés?	4. Devrait-il y avoir des exigences minimales en matière de scolarité ou d'expérience avant que les futurs représentants fassent leur entrée en carrière dans l'industrie de l'assurance (ex. études secondaires/CEGEP, expérience de travail, etc.)?	5. Quelles aptitudes, connaissances ou compétences un courtier ou un agent devrait-il posséder?	6. Quels seraient les bénéfices pour votre organisation ou pour l'industrie d'harmoniser les exigences de qualifications entre les juridictions? Veuillez élaborer	7. Quels défis l'harmonisation des exigences de qualifications comporte-t-elle selon vous?	8. En 2016, les membres des OCRA ont présenté un programme de qualification en assurance de personne (PQAP) actualisé. Ce programme présente les caractéristiques suivantes : • Élaboration d'un profil de compétences uniforme; • Un curriculum d'évaluation commun; • Du matériel de préparation aux examens standardisé; • Offre de formation et distribution du matériel de préparation par le biais de prestataires de cours accrédités; • Attestation de réussite du cours par les prestataires de cours accrédités; • Examen uniforme administré par le régulateur; • Approche modulaire pour le matériel de préparation et l'examen; • Examen à livre ouvert. Y a-t-il des aspects de ces normes de qualification qui pourraient être appliqués à la formation en assurance de dommages? Quel aspect pourrait ou ne pourrait pas être utilisé?	9. Comment suggéreriez-vous que le Comité consulte les parties prenantes au fur et à mesure que la révision progresse (ex. : fréquence, jalons importants, canaux de communication)?	10. Veuillez fournir tout autre commentaire que vous souhaitez partager avec le Comité et que vous jugez pertinent à cette révision.
11	Selon moi, il devrait être exigé une formation minimum d'un AEC en assurance de dommages. Actuellement pour accéder à la profession, les nouveaux candidats au poste d' agent ou de courtier doivent passer les examens de l'AMF à choix de réponses basés sur les volumes de l'AMF. Les gens n'ont pas besoin d'aucune formation pour passer ces examens. L'AMF a allégué la difficulté pour passer les examens, les gens étudient les volumes et se présentent aux examens. Presque la totalité des candidats passe les examens sans aucune difficulté. Cela ne donne pas une image adéquate de la connaissance et de la compétence des nouveaux candidats. Il devrait également être exigé de passer des niveaux 1-2 et 3 comme dans les autres provinces. Aucune exigence est mise en place ici au Québec.	Ce qui fonctionne bien actuellement, c'est que certains futurs candidats décident de suivre une formation en assurance de dommages au lieu d'aller directement aux examens de l'AMF. Ces candidats s'assurent d'avoir une formation complète au niveau des connaissances théoriques et les compétences pratiques de l'industrie. Les employeurs ont accès à une banque de candidats qui sont déjà formés pour l'industrie. Ces candidats par expérience vont demeurer plus longtemps dans le domaine de l'assurance car ils ont été présélectionnés avant de suivre la formation. Ce qui fonctionne bien également, c'est l'exigence de suivre des formations (20 UFC) qui permettent aux agents et aux courtiers de garder leur permis de pratique. Ceci est bénéfique pour l'industrie mais il y a certaines formations qui font l'objet d'aucune évaluation des connaissances de l'agent ou du courtier.	Les organismes de règlementation comme l'AMF et la CHAD, ont des règles de pratique de plus en plus sévères au niveau de l'exercice et de la déontologie des agents et des courtiers en assurance de dommages. Alors ce que je ne comprends pas c'est que la tendance du marché est d'opter vers un accès à la profession beaucoup plus facile, sans vérifier vraiment les compétences et les connaissances des nouveaux candidats. Dernièrement la loi 141, optait vers une pratique qui permettait aux consommateurs d'acheter de l'assurance en ligne et sans une intervention d'un agent ou d'un conseiller en assurance de dommages. L'assurance est un domaine complexe dans lequel il est difficile pour les intervenants de connaître tous les aspects par un simple examen de L'AMF à choix de réponses. D'autant plus que le domaine de l'assurance des entreprises demande encore plus de connaissances et de compétences.	Oui, il devrait y avoir des exigences minimales pour l'entrée en carrière en assurance de dommages. Actuellement un secondaire V et 3 ans d'expérience dans le marché du travail dans n'importe quel domaine, est suffisant pour permettre aux futurs candidats de passer les examens de l'AMF Une formation minimale un AEC en assurance de dommages devrait être exigée.	Un courtier d'assurance ou un agent doivent avoir plusieurs compétences et connaissances : Aptitudes à travailler en équipes Connaissances des logiciels informatiques dans le domaine de l'assurance Compétences et aptitudes à la vente Connaissances de l'anglais et de la terminologie en assurance de dommages Connaissances théoriques et pratiques en assurance des particuliers Connaissances théoriques et pratiques en assurance des entreprises. Aptitudes à développer l'autonomie (surtout chez les courtiers) Le sens de l'organisation Connaissances des différents domaines de l'assurance Connaissances de la déontologie Aptitudes aux multitâches. Aptitudes à la ponctualité et aux respects de ses pairs et des clients.	Les bénéfices pour l'industrie, il y en a plusieurs 1) Une certitude que les nouveaux candidats ont le même niveau de compétence et de formation. 2) Des couts moins élevés pour les entreprises de former leurs candidats car plusieurs entreprises forment leurs propres personnels 3) Actuellement il existe plusieurs organismes et Cégeps qui donnent des formations d'harmoniser les programmes dans tous les Cégeps donneraient une valeur ajoutée au programme de l'AEC. 4) Une certitude que les nouveaux candidats qui vont passer les examens ont les connaissances appropriées.	Actuellement cela représente un grand défi car certains Cégeps ont créé des programmes qui ne correspondent pas à l'acquisition des connaissances et des compétences et ni aux plans cadres exigés par le Ministère de l'éducation. Certains programmes en assurance de dommages sont allégés pour permettre à plus de candidats à accéder au milieu de l'assurance de dommages étant donné la pénurie de candidats. Chacun les formations ne sont pas uniformes actuellement certaines formations sont données par RCCAQ qui donnent des formations aux courtiers pour passer leurs examens de l'AMF, D'autres formations sont données par les assureurs eux-mêmes qui ont des formateurs à l'interne pour former leurs personnels et permettent aux futurs agents de passer les examens de l'AMF. Il devient difficile d'encadrer la profession car les formations sont données par tous et chacun sans aucune exigence.	Je préconise des examens à livre fermé étant donné qu'actuellement les examens à choix de réponses ne permettent pas d'évaluer correctement les connaissances des candidats Il faudrait opter pour des examens à choix de réponses et des examens à développement et à livre fermé. Actuellement n'importe qui peut s'improviser formateur accrédité, notre option est d'avoir une formation minimale qui est transmise par les Cégeps. Les Cégeps sont encadrés par le ministère de l'éducation, des programmes cadres, des évaluations des apprentissages. De plus ces formations sont accréditées par les organismes de règlementation. Des approches pour préparer les futurs candidats, est un projet souhaitable, mais fait dans le contexte que ces futurs candidats ne connaissent pas d'avance les questions d'examen de l'organisme de règlementation.	Pour l'instant il est difficile de se prononcer sur les fréquences mais c'est certain qu'il doit être encadré par des gens qui sont concernés par le projet	Une meilleure préparation des futurs candidats de l'industrie est souhaitable dans le contexte actuel, il y a certes une place à une amélioration.

Commentaires – Mastera – Formation continue du Cégep de Jonquière

1.
2. Dans le cadre québécois, l'AMF propose des évaluations standardisées qui permettent d'assurer un certain niveau. L'accès à ces évaluations offre une souplesse intéressante.
3.
4. Oui, mais les exigences actuelles au Québec semblent acceptables et les examens de l'AMF assurent une uniformité.
5. Voir les conclusions du rapport d'analyse des besoins de formations datant de septembre 2011 (en pj).
6. (Si nos exigences sont plus élevées) Permettrait à nos étudiants de travailler en dehors du Québec. Permettrait à notre institution d'offrir des formations qualifiantes hors Québec.
7. L'harmonisation des programmes d'études donnant accès aux qualifications (examens de l'AMF). Législation différente d'une province à l'autre.
8. À première vue, tout semble pertinent et près de l'offre actuelle.
9. Par courriel, dans les jalons importants.
10.

RAPPORT D'ANALYSE DES BESOINS DE FORMATION

« ATTESTATIONS D'ÉTUDES COLLÉGIALES

EN

ASSURANCE DE DOMMAGES »

Direction de la formation continue

Septembre 2012

Comité de développement du programme

Les spécialistes de contenu sont deux enseignantes au DEC Conseil en assurance et en services financiers :

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Comité de validation du programme

Le comité est constitué des membres du comité de développement de programme et des personnes suivantes :

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Cégep de l'Abitibi-Témiscamingue

Madame Catherine Veilleux
Cégep Beauce-Appalaches

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Monsieur François Miron
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Madame Sylvie Bernier
Cégep de l'Outaouais

Madame Lisa Roy
Cégep de Thetford

Madame Dale Gallagher
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Mesdames Martine Denommée & Huguette Lord
Cégep du Vieux-Montréal

Madame Guylaine Potvin & Monsieur Marius Cloutier
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INTRODUCTION

En 2008-2009, l'Autorité des marchés financiers (AMF) a procédé à des analyses de situations de travail. À la suite de celles-ci, les représentants de l'AMF en sont venus à la conclusion suivante : « Bien que les connaissances devant être maîtrisées par les agents, les courtiers et les experts en sinistre soient similaires, les habiletés et aptitudes nécessaires pour l'exerces de ces professions diffèrent considérablement ».

À la suite de cette conclusion, à l'automne 2011, l'AMF a modifié les compétences des examens en préconisant une nouvelle approche plus centrée sur la pratique professionnelle et sur la protection des consommateurs, concernant la certification des agents, des courtiers et des experts en sinistre. De nouveaux manuels de référence ont été publiés et les nouvelles compétences pour réussir les examens pour l'entrée en carrière furent modifiées en conséquence. Les nouveaux candidats devront développer l'approche conseil dans toutes leurs transactions et développer leur capacité d'analyse, leur savoir-faire et les attitudes relationnelles requises pour recommander des produits aux clients, sans oublier les règles de déontologie associées à la profession.

1. PROCESSUS D'ANALYSE

L'équipe de travail constituée aux fins de développer l'AEC en assurance de dommages est composée de deux conseillers pédagogiques et de deux enseignants au DEC en assurance de dommages, cumulant une vaste expérience du milieu de travail en assurance de dommages et du milieu pédagogique.

Lors du développement de ce programme, conduisant à l'obtention d'une attestation d'études collégiales, les démarches suivantes ont été effectuées concernant l'analyse des besoins de formation :

- Prise en compte de l'analyse des besoins de formation publiée par la Chambre de l'assurance de dommages (CHAD) en 2012. Ces derniers ont mis à jour l'analyse de situation de travail rédigée en 2008 par l'AMF, concernant les fonctions de travail d'agent, courtier et expert en sinistres. La CHAD a accueilli huit groupes de discussion à Montréal et à Québec. En tout, 57 personnes ont participé à ces rencontres, représentant 47 cabinets ou bannières de différentes tailles et de diverses régions afin d'obtenir une représentativité plus globale de l'industrie de l'assurance de dommages au Québec. Lors de ces rencontres, ils ont rédigé une liste de connaissances et d'habiletés requises pour l'exercice de ces fonctions de travail.

- Appel conférence avec 5 personnes et rencontre de 21 personnes, représentants différentes organisations et différents corps d'emploi, provenant soit des compagnies d'assurances, des bureaux de courtages et des experts indépendants pour les différents corps d'emploi (agent, courtier, expert en sinistres, gestionnaire des ressources humaines), autant dans le secteur des particuliers que celui des entreprises, pour valider les besoins présents et à venir des entreprises, les attitudes et aptitudes recherchées pour les fonctions de travail, incluant la souscription et le cautionnement.

- Compilation des réponses;
- Analyse des données;
- Rencontre de validation portant sur l'analyse des besoins de formation avec les collèges;
- Mise à jour des données à la suite des recommandations des collèges.

2. CARACTÉRISATION DES BESOINS DE FORMATION

2. 1 ACTIVITÉS DE TRAVAIL LIÉES AUX BESOINS DE FORMATION

La présente section comporte l'analyse effectuée pour chacune des trois (3) fonctions de travail soit : agent ou courtier, souscripteur et expert en sinistres. On y retrouve les activités de travail, la synthèse sur le processus de travail et finalement les habiletés, attitudes et aptitudes requises chez les futurs diplômés pour effectuer la tâche.

2.1.1 « Courtier en assurance de dommages »

Section 1 - Activités de travail : tâches et opérations

1.	**Effectuer du développement d'affaires.**
1.1	Identifier les marchés cibles
1.2	Analyser les produits disponibles
1.3	Développer des réseaux de contacts pertinents
1.4	Élargir/développer l'offre des produits à la clientèle actuelle
1.5	Développer la nouvelle clientèle

2.	**Établir la relation avec le client ou le client potentiel**
2.1	Établir un contact professionnel personnalisé
2.2	Écouter le client pour établir ses besoins
2.3	Préciser la démarche à suivre avec le client afin d'obtenir son accord

3.	**Obtenir les données auprès du client**
3.1	Obtenir les informations nécessaires afin de qualifier le client
3.2	Obtenir les informations nécessaires afin de qualifier le risque
3.3	Identifier les besoins et les attentes du client
3.4	Faire une collecte d'information complémentaire (au besoin)

4.	**Analyser le risque**
4.1	Analyser les informations obtenues
4.2	Référer à des personnes ressources internes ou externes afin d'obtenir l'expertise nécessaire (au besoin)
4.3	Identifier les assureurs et les produits potentiels
4.4	Effectuer une collecte d'information supplémentaire (au besoin)
4.5	Préparer les recommandations à la suite de l'analyse

5.	**Conseiller le client, lui proposer des recommandations et des solutions**
5.1	Divulguer les liens d'affaires
5.2	Expliquer et vulgariser les couvertures et les produits disponibles et offerts
5.3	Préciser au client le ou les assureurs impliqués
5.4	Proposer au client des alternatives au produit offert (au besoin)
5.5	Informer le client des conséquences d'un refus de couverture de sa part ou de celle de l'assureur et des obligations qui en découlent
5.6	Informer le client du montant de la prime et des modalités de paiement possibles

6.	**Conclure la vente**
6.1	Faire valoir au client les avantages de s'assurer avec nous
6.2	Contrer s'il y a lieu les objections du client
6.3	Consigner au dossier les produits offerts et refusés
6.4	Faire valider l'entente avec le client
6.5	Confirmer au client les modalités de paiement
6.6	Émettre les notes de couvertures et les envoyer/remettre à l'assuré et à l'assureur
6.7	Saisir les opportunités pour d'autres contrats possibles

7.	**Traiter les réclamations**
7.1	Colliger les données relatives à la réclamation
7.2	Prendre en charge les sinistrés (sinistre majeur)
7.3	Conseiller/informer le client de l'impact possible de la réclamation sur la police
7.4	Transmettre la réclamation aux assureurs
7.5	Faire le suivi de la réclamation
7.6	S'assurer de la qualité de la décision de l'assureur et négocier au besoin
7.7	Régler le dossier (s'il y a lieu)
7.8	Faire le suivi de la satisfaction auprès du client
7.9	Fermer le dossier

8.	**Assurer le suivi après-vente**
8.1	Effectuer les modifications, renouvellement, annulation de police
8.2	Assurer le suivi du paiement ou référer à la comptabilité ou à l'assureur (selon le cas)
8.3	Sonder la clientèle afin de s'assurer de sa satisfaction
8.4	Traiter les plaintes (au besoin)

9.	**Utiliser les systèmes informatisés afin de documenter le dossier du client (tout au long du processus)**
9.1	Saisir les différentes données afin de documenter le dossier du client
9.2	Mettre à jour le dossier du client
9.3	Compléter et envoyer la documentation aux assureurs
9.4	Effectuer le classement des dossiers informatisés

« Agent en assurance de dommages »

Section 1- Activités de travail : tâches et opérations

1.	**Effectuer du développement d'affaires.**
1.1	Identifier et développer les marchés cibles
1.2	Associer et cibler les produits disponibles selon les besoins de la clientèle
1.3	Développer des réseaux de contacts pertinents dans le but d'élargir la nouvelle clientèle (associations, amis, etc.)
1.4	Solliciter la clientèle actuelle

2.	**Établir la relation avec le client ou le client potentiel**
2.1	Établir un contact professionnel personnalisé et divulguer les liens d'affaires
2.2	Écouter le client pour établir ses besoins

2.3	Préciser la démarche à suivre avec le client afin d'obtenir son accord

3.	**Obtenir les données auprès du client**
3.1	Identifier et obtenir les informations nécessaires afin de qualifier le client
3.2	Identifier et obtenir les informations nécessaires afin de qualifier le risque
3.3	Identifier les besoins et les attentes du client
3.4	Faire une collecte d'information complémentaire (au besoin)
3.5	Identifier les opportunités pour d'autres contrats possibles
3.6	Associer les produits selon les besoins du client

4.	**Appliquer les notions d'analyse le risque**
4.1	Valider la conformité avec les normes de souscription
4.2	Appliquer des notions d'analyse à l'ensemble du dossier
4.3	Référer à des personnes ou organismes ressources afin d'obtenir l'expertise nécessaire (au besoin)
4.4	Identifier les produits et garanties requis pour couvrir adéquatement le client
4.5	Effectuer une collecte d'informations supplémentaires (au besoin)
4.6	Cerner et maîtriser les conditions qui pourraient modifier l'offre au client
4.7	Déterminer l'acceptation ou le refus incluant les conditions à la suite de l'analyse (s'il y a lieu)
4.8	Préparer la proposition, la soumission et, s'il y a lieu, les conditions à la suite de l'acceptation

5.	**Conseiller le client, lui proposer des recommandations et des solutions**
5.1	Transmettre les résultats de l'analyse
5.2	Expliquer et vulgariser les couvertures et les produits disponibles et offerts
5.3	Proposer au client des alternatives au produit offert (au besoin)
5.4	Informer le client des conséquences d'un refus de couverture de sa part ou de celle de l'assureur et des obligations qui en découlent
5.5	Informer le client du montant de la prime et des modalités de paiement possibles
5.6	Convenir et respecter les engagements avec le client

6.	**Présenter l'offre au client**
6.1	Faire valoir au client les avantages de s'assurer avec nous
6.2	Répondre aux objections du client
6.3	Consigner au dossier les produits offerts et refusés

7.	**Assurer le service à la clientèle**
7.1	Effectuer les modifications
7.2	Résilier la police
7.3	Mettre à jour le dossier au renouvellement
7.4	Traiter les plaintes (au besoin)
7.5	Expliquer les modalités de paiement ou référer (selon le cas)
7.6	Favoriser la rétention
7.7	Informer le client de l'impact possible d'une réclamation sur sa police

8.	**Conclure la transaction**
8.1	Valider l'entente avec le client
8.2	Confirmer au client les modalités de paiement
8.3	Rappeler au client les étapes subséquentes
8.4	S'assurer d'avoir répondu au besoin du client
8.5	Lire et analyser les rapports d'inspection et proposer des recommandations

8.6	Émettre et envoyer les notes de couvertures (s'il y a lieu)

9.	**Utiliser adéquatement les systèmes informatisés (tout au long du processus)**
9.1	Saisir les données afin de documenter le dossier du client et le maintenir à jour
9.2	Consulter les documents de référence/outils en ligne
9.3	Compléter et envoyer la documentation
9.4	Communiquer avec le client par des outils informatiques

Lors de la rencontre, avec les experts, les fonctions de courtier et d'agent en assurance de dommages ont été traitées en même temps

La qualité du travail du courtier ou de l'agent en assurance de dommages est évaluée en fonction :

- de l'adéquation entre les couvertures offertes et les besoins du client;
- de la qualité des notes au dossier;
- du respect des normes;
- de la capacité de donner des exemples au client;
- de la courtoisie;
- de la satisfaction de la clientèle;
- de l'atteinte des objectifs.

Les connaissances suivantes sont requises pour effectuer la tâche :

- les caractéristiques des produits de plusieurs assureurs;
- les différences entre les contrats;
- les normes, les lois et le code de déontologie;
- les outils informatiques;
- les principes généraux de l'assurance;
- les formulaires, notamment ceux du BAC et ceux utilisés en assurance de dommages des entreprises;
- les bases du Code du bâtiment;
- la comptabilité de base et de gestion;
- l'analyse des états financiers;
- la prévention des sinistres.

Section 2 - Synthèse sur le processus de travail (agent ou courtier)

Commentaires ajoutés par les experts consultés lors de la validation des tâches des courtiers et des agents en assurance de dommages en lien avec les principaux changements actuels et futurs de l'industrie

Concernant la maîtrise des outils informatiques : Connaissance de base des outils informatiques seulement, mais développer la capacité d'utiliser l'informatique en multitâche: la rigueur et l'exactitude des renseignements générés tout en maintenant une rapidité d'exécution acceptable. Développer une communication orale et écrite efficace, maîtriser la prise de notes et la synthèse de l'information. Maîtriser des bases simples en comptabilité, être capable de comprendre les états financiers des entreprises.

Concernant les notions relatives au code du bâtiment : s'assurer de connaître les rudiments concernant les principaux types de bâtiments et les normes de construction sans nécessairement s'approprier le code du bâtiment.

Section 3 - Habiletés, attitudes et aptitudes (agent ou courtier)

HABILETÉS : les capacités suivantes ont été jugées nécessaires pour exercer une carrière de courtier ou d'agent en assurance de dommages.
- Analyser, synthétiser, vulgariser
- Gérer les priorités
- Communication
- Maîtriser les techniques de vente
- Écouter attentivement
- Déceler les occasions d'affaires
- S'adapter aux clients
- Développer l'entrepreneuriat
- Négocier
- Travailler en équipe
- Bien gérer le refus
- S'adapter aux changements
- Développer rigueur et jugement
- Mémoriser l'information
ATTITUDES :
- Curiosité
- Empathie
- Courtoisie
- Loyauté envers l'entreprise
- Confiance en soi
- Souci de la qualité du service
- Souplesse
- Discrétion
- Entregent
- Disponibilité
- Professionnalisme
APTITUDES :
- Capacité de travail en équipe
- Capacité de résistance au stress
- Capacité d'adaptation aux changements
- Capacité d'analyse et de prise de décision

2.1.2 « Expert en sinistres »

Section 1 - Activités de travail : tâches et opérations

1.	**Prendre l'avis de sinistre**
1.1	Procéder à l'ouverture du dossier informatique et physique (s'il y a lieu)
1.2	Conserver le dossier ou le transférer vers la bonne personne (selon la complexité ou le champ de compétence)
1.3	Consigner les informations de base concernant le sinistre
1.4	Évaluer les actions urgentes à prendre
1.5	Établir la nature de la réclamation
1.6	Prendre connaissance de l'avis de sinistre

2.	**Valider les garanties en tenant compte de la cause**
2.1	Établir si la perte est recevable, si la police est en force et le montant des garanties
2.2	Analyser le contrat
2.3	Consigner les données recueillies sur des formulaires

3.	**Documenter le dossier**
3.1	Documenter le dossier en complétant la feuille de route, les notes au dossier et la fiche de temps (s'il y a lieu)
3.2	Consigner des données (corriger, analyser et synthétiser tous les rapports des spécialistes)

4.	**Établir les réserves**
4.1	Établir la valeur de la réclamation de façon approximative
4.2	Réviser les réserves

5.	**Prendre en charge l'assuré (conseiller et accompagner)**
5.1	Le référer à des fournisseurs
5.2	l'informer s'il est couvert ou non, l'informer de la franchise et sur le processus à venir
5.3	Faire des suivis avec l'assuré
5.4	Prendre en charge les plaintes (traitement)
5.5	L'informer de ses droits et de ses obligations

6.	**Déterminer la responsabilité, enquêter ou établir la cause du sinistre**
6.1	Effectuer une évaluation préliminaire des causes potentielles du sinistre
6.2	Prendre connaissance du rapport de police et des pompiers
6.3	Avoir recours à des experts externes (tout en tenant compte de politiques internes)
6.4	Recueillir de l'information et annoter (photos, visites des lieux)
6.5	Prendre les déclarations (de l'assuré et des tiers)
6.6	Obtenir le consentement de l'assuré afin d'obtenir des renseignements personnels et obtenir certains rapports
6.7	Recourir aux autorités policières, au besoin
6.8	Déceler les indicateurs de fraude potentielle
6.9	Produire le rapport d'enquête (s'il y a lieu)

7.	**Faire le lien avec d'autres départements**
7.1	Déterminer les actions à apporter- interventions dans le dossier client
7.2	Faire des recommandations ou informer les personnes concernées de certains faits observés ou des témoignages recueillis

8.	**Prendre en charge l'assuré (conseiller et accompagner)**
8.1	Mandater des gens pour obtenir des estimations (expertises)
8.2	Demander des pièces justificatives et des preuves de possession
8.3	Analyser les documents et faits pertinents (analyse du dossier)
8.4	Tenir compte des conditions du contrat (limitations, franchise, exclusions, valeur à neuf, règle proportionnelle, dépréciation, valeur au jour du sinistre)
8.5	Obtenir le détail de la perte, faire un inventaire et le relevé des dommages
8.6	Faire une partie de l'analyse du sinistre (estimation, utilisation d'un logiciel d'évaluation, recours à des listes de fournisseurs, mise à profit de l'expérience de l'expert)

9.	**Identifier et protéger un recouvrement potentiel**
9.1	Déterminer le délai de prescription
9.2	Envoyer l'avis d'engagement de responsabilité et l'avis de dénonciation
9.3	Analyser les éléments en lien avec le recouvrement
9.4	Compléter et effectuer les démarches en lien avec le recouvrement

10.	**Procéder au règlement**
10.1	Présenter le règlement selon les pièces obtenues et expliquer le calcul de l'indemnité
10.2	Négocier le règlement (s'il y a lieu)
10.3	Faire le lien avec les autres assureurs
10.4	Obtenir l'autorisation nécessaire (s'il y a lieu)
10.5	Expliquer ses droits à l'assuré (référer au processus de médiation, d'arbitrage ou la Cour des petites créances)
10.6	Au besoin, représenter l'assureur à la Cour des petites créances
10.7	Faire le suivi des déboursés (ceux-ci peuvent être progressifs pour les grosses pertes)
10.8	Assurer le suivi de l'avancement des travaux en cours de règlement

11.	**Identifier et protéger un recouvrement potentiel**
11.1	Effectuer les paiements
11.2	Payer les frais d'experts
11.3	Envoyer la quittance ou la demande d'indemnité
11.4	Faire les rapports aux autorités concernées

La **qualité du travail** de l'expert en sinistre est évaluée en fonction :

- de l'adéquation entre le règlement proposé et le contrat souscrit;
- du respect de la réglementation, notamment du *Code de déontologie;*
- du respect des normes de l'assureur et des politiques internes;
- du respect des délais prescrits;
- de la satisfaction de la clientèle.

Les **connaissances** requises pour effectuer la tâche :

- les caractéristiques des produits de plusieurs assureurs;
- les différences entre les contrats;
- les normes, les lois et le code de déontologie;
- les outils informatiques;
- les principes généraux de l'assurance
- les formulaires, notamment ceux du BAC et ceux utilisés en assurance de dommages des entreprises;
- le *Code du bâtiment;*

- le vocabulaire spécifique au domaine (termes techniques liés à la mécanique du bâtiment, par exemple).

Section 2- Synthèse sur le processus de travail (expert en sinistres)

Commentaires ajoutés par les experts consultés lors de la validation des tâches des expertes en sinistre en lien avec les principaux changements actuels et futurs de l'industrie.

- Concernant les notions relatives au code du bâtiment : s'assurer de connaître un peu plus que les rudiments concernant les principaux types de bâtiments et les normes de construction sans nécessairement s'approprier le code du bâtiment.
- Analyser les causes, comprendre le fonctionnement pour mieux être en mesure d'évaluer la recevabilité de la plainte.
- Notions concernant la convention d'indemnisation directe et les principes de droit.
- Connaissance des notions de base en responsabilité civile et tout autre domaine.
- La porte d'entrée de tout expert en sinistre demeure le secteur relié à l'automobile, mais ce dernier devrait avoir les compétences pour rencontrer des dossiers d'une autre nature rapidement.
- Développer une communication orale et écrite efficace, maîtriser la prise de notes et la synthèse de l'information.

Section 3- Habiletés, attitudes et aptitudes (expert en sinistres)

HABILETÉS
- Communiquer, vulgariser, expliquer
- Analyser, prendre des décisions
- Négocier
- Gérer le stress, gestion du refus
- Gérer les priorités
- Prendre des initiatives
- S'adapter aux différents intervenants
- Savoir faire des liens
- Savoir enquêter, rechercher l'information
- Être polyvalent
- Rédiger dans un français correct
- S'adapter aux changements
- Synthétiser l'information
- Accepter la critique
ATTITUDES
- Écoute attentive
- Sens du service à la clientèle
- Empathie
- Curiosité (recherche d'informations)
- Disponibilité

- Sens de l'organisation
- Patience
- Amabilité
- Esprit d'équipe
- Ouverture d'esprit
- Esprit critique
- Facilité à nouer de bonnes relations interpersonnelles
- Intégrité
- Sens de l'observation
APTITUDES
- Maîtrise de soi dans des cas de sinistres graves, contrôle des émotions
- Capacité de vulgarisation
- Capacité d'analyse
- Capacité de décision
- Capacité de travail en équipe
- Capacité de négociation
- Capacité d'adaptation

2.1.3 « Souscripteur »

Section 1 - Activités de travail : tâches et opérations

1.	**Analyser un risque**
1.1	Prendre connaissance de la demande, de la proposition ou du devis
1.2	Consulter les fichiers de l'assureur
1.3	Consulter la documentation spécialisée
1.4	Consulter les guides de souscription
1.5	Recueillir les données supplémentaires
1.6	Appliquer la politique de souscription de la compagnie
1.7	Remplir des formulaires relatifs à une proposition, s'il y a lieu
1.8	Consulter les lois et les règlements qui s'appliquent
1.9	Consulter la jurisprudence
1.10	Consulter des spécialistes
1.11	Consigner les données au dossier
1.12	Apprécier le risque
1.13	Refuser une demande, s'il y a lieu
1.14	Accepter une demande, s'il y a lieu, avec ou sans modification

2.	**Souscrire un risque**
2.1	Choisir le contrat
2.2	Déterminer les avenants
2.3	Déterminer des conditions liées à l'assurance
2.4	Déterminer les conditions liées au risque
2.5	Tarifer une demande
2.6	Communiquer la décision
2.7	Négocier les conditions
2.8	Proposer des modifications au contrat

2.9	Attendre l'acceptation ou le refus
2.10	Fournir les données pour l'émission du contrat
2.11	Vérifier l'exactitude du contrat
2.12	Demander une inspection
2.13	Consulter l'assureur précédent
2.14	Prendre une décision en fonction de faits nouveaux
2.15	Formuler des recommandations
2.16	Assurer le suivi

3.	**Promouvoir les produits d'assurance de l'assureur**
3.1	Communiquer avec la clientèle
3.2	Déceler les besoins de la clientèle et tenir cette information à jour
3.3	Déterminer le potentiel d'affaires
3.4	Informer la clientèle sur les nouveaux produits
3.5	Proposer des services en fonction des besoins
3.6	Faire des visites, s'il y a lieu
3.7	Participer à des séances d'information
3.8	Prendre connaissance de la demande

La qualité du travail du souscripteur est évaluée en fonction :

- de la sélection du risque;
- de l'évaluation du risque;
- de l'acceptation ou du refus du risque;
- de l'établissement des conditions de souscription;
- de l'adéquation entre les couvertures offertes et les besoins du client;
- de la qualité des notes au dossier;
- du respect des normes;
- de la courtoisie;
- de la satisfaction de la clientèle.

Les connaissances suivantes sont requises pour effectuer la tâche :

- les caractéristiques des produits de plusieurs assureurs;
- les différences entre les contrats;
- les normes, les lois et le code de déontologie;
- les outils informatiques;
- les principes généraux de l'assurance;
- les formulaires, notamment ceux du BAC et ceux utilisés en assurance de dommages des entreprises;
- les bases du *Code du bâtiment;*
- la comptabilité de base et de gestion;
- l'analyse des états financiers;
- la prévention des sinistres.

Commentaires :

Commentaire ajouté lors de la validation : Ne pas aller trop loin dans la vérification, peu de cas sont vérifiés au Palais de justice.

Section 2 - Synthèse sur le processus de travail (souscripteur)

Commentaires ajoutés par les experts consultés lors de la validation des tâches des souscripteurs en lien avec les principaux changements actuels et futurs de l'industrie.

Apte à gérer l'équilibre entre la connaissance et la rentabilité
Développer le jugement logique, le sens de l'organisation, l'accompagnement du client

Section 3 – Habiletés, attitudes et aptitudes (souscripteur)

HABILETÉS :
- Analyser et prendre une décision, justifier ses décisions
- Déceler les occasions d'affaires
- Communiquer
- Négocier
- Maîtriser les techniques de vente
- Rechercher l'information
- S'adapter aux changements
- Conseiller
- Travailler en équipe, collaborer avec l'équipe
- Être polyvalent
- Gérer efficacement les priorités, gérer le stress et la pression
- Rédiger dans un français correct, documenter les notes au dossier, synthétiser l'information
ATTITUDES ET APTITUDES :
- Avoir un bon jugement
- Confiance en soi et en l'entreprise
- Faire preuve d'une ouverture d'esprit, écoute attentive
- Avoir une résistance au stress
- Faire preuve d'intégrité, respecter le code de déontologie
- Avoir le sens du service à la clientèle
- Avoir un esprit critique
- Être sociable, nouer des relations interpersonnelles
- Curiosité
- Avoir un bon sens de l'observation
- Avoir un bon sens de l'organisation pour gérer les urgences
- Avoir de l'empathie
- Être disponible
- Avoir l'esprit d'équipe
- Capacité d'adaptation aux changements techniques et administratifs

2. 2 CONSTATS SUR LES DIFFÉRENTES FONCTIONS DE TRAVAIL

- Être à l'aise avec un **environnement informatique (multitâches)**;
- Développer l'approche conseil dans toutes leurs transactions;
- Influencer (techniques de vente);
- Appliquer des normes de prévention (composante d'un bâtiment);
- Communiquer de façon concise (synthétiser);
- S'adapter à différentes personnes;
- Interpréter les états financiers (notions de comptabilité);
- Faire des liens avec des partenaires, coopérer;
- Maintenir les cours d'assurance des entreprises qui est en progression constante;
- Appliquer les règles de déontologie associées à la profession;
- Développer le sens de l'écoute;
- Développer leur capacité d'analyse;
- Développer la curiosité (poser les bonnes questions afin de mieux saisir la demande);
- Avoir une ouverture d'esprit (trouver des solutions gagnantes pour l'offre de service).

LES ÉLÉMENTS SUIVANTS SERONT RÉDUITS OU RETIRÉS LORS DE LA RÉDACTION DES COMPÉTENCES :

Le marketing puisque les étudiants n'auront pas à concevoir la mise en marché pour de nouveaux produits, mais plutôt introduire le marketing dans l'approche client.

La gestion puisqu'ils n'auront pas à occuper des postes de gestionnaire dans les premières années d'emploi.

INFORMATISATION DES TÂCHES

L'analyse des résultats nous permet de conclure qu'une très forte proportion des tâches et opérations sont informatisées, et ce, dans toutes les fonctions de travail.

Les entreprises mentionnent que les étudiants devraient maîtriser l'informatique pour travailler sur différents systèmes, c'est-à-dire être à l'aise avec le clavier, Internet (courriel), Word, Excel. De plus, l'utilisation d'un logiciel spécialisé en assurance est primordiale pour l'intégration des compétences et pour préparer les futurs diplômés à travailler avec ce genre d'outils.

COLLÈGE MONTMORENCY

Le 20 août 2018

Commentaires sur la révision des normes de qualification en assurance de dommages (CRNQAD) des Organismes canadiens de réglementation en assurance (OCRA).

1. **Selon vous, à quoi devraient ressembler les exigences de qualification pour la certification en assurance de dommages?**

Les exigences de qualification pour la certification en assurance de dommages devraient être orientées d'abord et avant tout pour la protection du public. Une véritable formation professionnelle devrait être exigée de manière à garantir la protection du public, mais également une prestation professionnelle répondant aux plus hauts standards.

Ceci aura en plus comme effet d'améliorer la stabilité et la rentabilité des portefeuilles d'assurance de même que de rehausser l'image de l'industrie.

2. **Qu'est-ce qui fonctionne bien dans le cadre actuel?**

De notre point de vue, au Québec le fonctionnement du système de certification semble bien fonctionner en général.

3. **Comment les cadres actuels pourraient-ils être améliorés?**

Les cadres actuels au Québec sont bons. Le seul point qui pourrait être amélioré serait la formation minimale.

4. **Devrait-il y avoir des exigences minimales en matière de scolarité ou d'expérience avant que les futurs représentants fassent leur entrée en carrière dans l'industrie de l'assurance?**

Afin d'améliorer la protection du public, la stabilité des portefeuilles d'assurance et leur rentabilité, une formation minimale spécialisée de niveau collégiale (technique) devrait être exigée avant la passation des examens réglementaires.

5. **Quelles aptitudes, connaissances ou compétences un courtier ou un agent devrait-il posséder?**

Droit général, droit des assurances, déontologie, produits d'assurance (automobile, particuliers, entreprises, cautionnement), règlement de sinistres, gestion de risques, souscription, normes de construction et de prévention.

6. **Quels seraient les bénéfices pour votre organisation ou pour l'industrie d'harmoniser les exigences de qualifications entre les juridictions?**

Il n'y aurait aucun bénéfice à l'harmonisation pour notre organisation.

Pour l'industrie, l'harmonisation aurait pour effet de faciliter la mobilité de la main d'œuvre de même que qu'une simplicité accrut dans la gestion des entreprises œuvrant dans différentes juridictions.

7. **Quels défis l'harmonisation des exigences de qualification compte-t-elle ?**

L'adaptation pourra être plus difficile pour les juridictions ayant des exigences moins contraignantes.

8. **Y a-t-il des aspects des normes de qualification en assurance de personnes (PQAP) qui pourraient être appliqués à la formation en assurance de dommages ?**

En général, les caractéristiques du PQAP pourraient s'appliquer en assurance de dommages. Une formation spécialisée devrait cependant être exigée (de même qu'en assurance de personnes) afin d'améliorer la protection du public et la rentabilité de l'industrie.

9. **Comment suggéreriez-vous que le Comité consulte les parties prenantes au fur et à mesure que la révision progresse?**

Via l'Autorité des marchés financiers qui peut communiquer aux prestataires de formation.

The Insurance Institute of Canada Responds to CISRO/GILQR on the Issue of Harmonizing Licensing Standards in Canada.

August 20, 2018

Introduction

In many ways, the Insurance Institute of Canada (The Institute) has been an agent of standards and harmonization since we began our work in 1899 as the Insurance Institute of Ontario. In 1952 we established the national network for education and testing that we operate today.

From our earliest days, we were formed with a mission to educate and professionalize the insurance industry's workforce and to develop common standards of ethics and service in order to protect the consumer interest and foster an atmosphere of trust in the insurance marketplace.

For many years the Institute, has been providing the curriculum and examinations in French and English to meet licensing requirements for Brokers, Agents, and while not part of the review independent adjusters. This gives us the unique ability to comment from an all-encompassing industry perspective.

As a result, CISRO's request for comment on the harmonization of general insurance licensing requirements being considered by the General Insurance Licensing Qualification Review, GILQR, resonates with The Institute's organizational DNA. So we are very pleased to offer this set of responses to the questions posed and look forward to a meaningful role in the process as it moves ahead.

Across The Institute's current national infrastructure, we see the benefits of standardization each day. We believe that a similar approach to licensing would be equally beneficial to all students, the industry and to the consumer beyond.

This response to the GILQR committee is informed by our recent contribution to CCIR/CISRO's proposed Guidance for the Fair Treatment of Consumers. We note how both inquiries seek to honour the consumer's new standing in the digital era where service, accountability and transparency are highly valued.

Actually, in the education of insurance professionals today, we already have a high degree of unofficial harmonization across the provinces. It is well displayed in the chart of provincial educational requirements distributed by GILQR with its request for input on these questions**. In each of these jurisdictions, including those areas where The Institute does not manage licensing exams as it does today in Ontario, BC, Saskatchewan, Manitoba and Nova Scotia, requirements can be fulfilled by completing courses offered by The Institute.**

Generations of Canadian insurance professionals, CIPs, have acquired their education at The Institute. In 19 chapters across the country, on webinars and distance learning platforms, the same ethical standards and business principles are being used to educate and prepare students for their licensing, regardless of their location. In a further act of harmonization, those professionals then carry these standards into thousands of offices where they influence performance and business decisions in every part of Canada, guarding the industry's reputation for servicing consumers reliably and ethically.

Whatever the final architecture of a harmonized path to licensing we believe there is great value in the consistency produced by The Institute's approach to national education and testing. Today the property and casualty insurance industry is known to operate at a high level of trust, productivity and ethical practice. Through its founding goals, The Institute has helped develop

this reputation and we feel that standardization in licensing requirements would help all elements of the industry move forward together.

System reviews of all types are an opportunity to determine future needs, assess current effectiveness and adjust process. Thank you for this opportunity to participate in this important work. We look forward to fulfilling our role as the industry's educator and examiner well into the future, able to accommodate new processes and imperatives and ready to teach the values that produce excellent service and protection for consumers of insurance.

Responses

1) What should the educational requirements for the general insurance licensing look like?

To a large extent, The Institute's current system is a viable model for a national education and licensing process. As noted, our education programs and the associated materials including textbooks, examinations, proprietary research, seminars and webinars are in wide use across the country.

To serve consumers best, the Insurance Institute recommends licensing requirements based on standardized nationwide education addressing elements common to all jurisdictions. Additionally, each jurisdiction would address provincial legislative variances with specific modules such as auto insurance, for instance. The Insurance Institute provides curriculum/texts that address all provincial automobile jurisdictions.

A consistent national licensing framework offers many advantages:

- Our customer-centred industry would be able to offer services that are more squarely focused on a customer's individual needs. For instance, those with cross-provincial insurance requirements could rely on one broker rather than several to manage their insurance transactions. Not only would this be more efficient, it would also be less intimidating for a newcomer who is considering a national approach to a business idea.

- The vital role of supervision and enforcement would be easier to accomplish with just one common set of standards to administer.

- Harmonized national standards across jurisdictions suits the tenor of the times which calls for flat processes wherever possible as a method of increasing transparency and service for the consumer.

To date, with so many jurisdictions accepting and/or requiring educational elements from The Institute, for the most part we already teach from a harmonized curriculum. This has helped the insurance industry mature and develop very high standards of service and protection for consumers.

2) What works well within current frameworks?

Our mission at The Institute is to not only educate students with the technical knowledge they need to serve customers properly, but to instil a high standard of ethical obligation throughout our community.

From The Institute's background as educators and examiners, the best outcomes for licensing are achieved through close alignment between the education materials and the examination.

This approach is working very well with the Ontario (OTL) agent license we administer as well as our licensing programs in Nova Scotia, Newfoundland, Saskatchewan and British Columbia where we provide the education materials and administer the examination.

However, developing education materials is our primary mandate. Our in-house team has a depth of experience that includes highly-educated instructional designers, academic editors, learning technology professionals and examination specialists. Having this level of expertise at hand allows The Institute to continuously develop and improve its education products, maintaining relevance and currency throughout our community.

The Institute uses a variety of methods to collaborate with stakeholders in order to keep our educational products on the leading edge:

- Our professionals routinely consult with external subject matter experts including senior personnel from brokerages, insurers and claims organizations from across the country. This helps produce insurance professionals who are equipped with the specific knowledge in demand by our industry partners.

- We ensure that our materials and examinations meet the highest degree of pedagogical standards and are developed with sound adult learning principles.

- We update our licensing materials, General Insurance Essentials (GIE) and Chartered Insurance Professional courses, frequently, and materials on topics that are routinely impacted by legislative or other changes are updated as required. For example, the GIE courses (C81 and C82) have just undergone a significant revision in consultation with provincial regulators to ensure optimal alignment with the level one licensing curriculum. As of August 1 2018, these new textbooks are included in licensing kits.

Exams

The Institute currently acts as the examiner for regulators in British Columbia, Saskatchewan, Ontario, Newfoundland and Nova Scotia. Developing and administering rigorous examinations is one of our greatest responsibilities as an Institute and we are committed to meeting the highest standards of academic integrity.

Our process of developing and administering exams includes:

- Consultation with highly-qualified psychometricians to develop the exam models and blueprints.

- Use of sound exam development techniques that validate the integrity and support the defensibility of our exams.

- Knowledge and expertise of subject matter experts, all CIP and/or FCIP graduates with many years of industry experience.
- Strict policies and procedures for exam administration in a computer-based and proctored environment.

The current review of licensing qualifications is an opportunity for The Institute to share learning and insights acquired from its historic position as educator and examiner for the P&C insurance industry. Our professionals are eager to work closely with the CILQR committee and other elements of CISRO as licensing requirements are reviewed for their suitability through the lens of consumer protection.

3) How could the frameworks be improved?

The Institute recommends two main improvements to licensing requirements:

1. In those areas where exams are still offered through regulators, resources and expertise could be optimized by partnering with an educator as the course provider and examiner.

   The Institute already manages this process in Ontario, British Columbia, Newfoundland, Saskatchewan, Manitoba and Nova Scotia with excellent results and is well positioned to expand this service.

   Partnering with educators for examinations would be meaningful act of harmonization, building upon the national testing infrastructure already in place at The Institute, for instance.

   We expect that relying on fewer licensing methods will reduce regulatory effort and eliminate the margin for error that can come from too many different systems in operation for the same function.

2. Although not part of this project, we see enormous value in standardizing requirements for continuing education (CE) across the country.

   Progress in the insurance industry is being driven by many internal and external factors, creating a dynamic where change is happening at all levels of the sector in this fast moving era. Therefore it is a prudent moment to consider standardizing a CE requirement as the pace of change is likely to accelerate before it diminishes.

   Much of this change is prompted by the need to refresh product lines using digital sensibilities and to provide the consumers with more transparency, service and protection against bad actors. New elements of risk are adding another layer of complexity, especially related to increasingly severe weather events which have the potential to intensifying the need for guidance from insurance professionals.

   The Institute is committed to keeping its community refreshed with the latest developments in insurance and risk through our ongoing program of original research, seminars and webinars. Recent work in this area has explored the topics of Artificial Intelligence and the Sharing Economy for their impact on the insurance industry.

With the need to present the insurance consumer with assurance from engaged, knowledgeable and up-to-date insurance professionals we believe that CE should be a requirement for the industry while offering flexibility in how CE is pursued.

With an infrastructure in place to continually develop learning materials, The Institute's focus on CE is informed by our ongoing conversation with all levels of the insurance industry; from thought leaders, to innovators to corporate executives. In addition to our own surveillance, they are able to pinpoint emerging points of interest which need to become part of the curriculum in some form, ensuring The Institute's commitment to currency and relevance.

In this sense, The Institute obtains input comes from many qualified quarters, managed by our in-house team of professionals who then use their expertise to convert input to learning.

Notably, harmonizing a requirement for CE would be a powerful act of protection for the consumer when making spending decisions about insurance protection.

4) Should there be minimum education and/or experience requirements?

Yes.

In the recent past a high school diploma was sufficient to begin a career in all sorts of fields. This is no longer the case if only because the world produces so much knowledge that 12 years of education isn't enough to learn all that needs to be learned in order to achieve success in the modern economy.

Similarly, the insurance industry is highly dynamic and becoming more complicated all the time as new risks emerge and practices shift accordingly. Additionally, the business of insurance, building trust and confidence in addition to processing and paying claims, is extremely important work involving fiduciary responsibilities. Therefore we believe that the verifiable skills and attributes needed to enter the field should be harmonized for consumer protection, above all.

Already, the industry requires new hires to work under restrictions. This indicates that the principle of minimum educational requirements is widely recognized as a value within the industry. We urge regulators to recognize that harmonization in this area would be an immediate benefit to the consumers in the same way that CE would be. It makes no sense to seek harmonization in some areas and to leave this situation dangling where minimum educational requirements are unexpressed.

In terms of such requirements, The Institute suggests the following:

- For a Level One broker/Agent: we believe that at a minimum, high school education and completion of the General Essentials (GIE) or CIP Courses: C11 Principals and Practice of Insurance, and C130 Essential Skills for the Broker.

- For a Level Two Broker or Agent we suggest level one requirements along with completion of C131 Advanced Skills for the Insurance Broker and Agent.

- For Level Three Broker or Agent we suggest: level two requirements plus completion of CIP course C132: Practical Issues in Broker Management.

5) What skills and knowledge and/or competencies should a broker have?

The role of the Broker is to set the tone of business in their offices, supervise staff, execute fiduciary responsibilities, maintain standards and correct situations that fall off-side. Additionally, they model behaviour for newcomers and offer counsel on ethics as issues arise. For consumers, a Broker's performance should project competence and trustworthiness, an embodiment of the promise of insurance.

Brokers and Agents trained by The Institute have the advantage of a codified education that provides learning appropriate to their function. From our background of educating employees at all levels and functions in the insurance industry, we recommend the following skillset for Brokers and Agents. One caveat is that the structure of brokerages and agencies vary as do the products sold and this would impact the skills required for an agent and broker. Thus the Insurance Institute suggests that competency profiles and examinations vary accordingly.

Level One:

1. Technical skills:
    a. Knowledge of all primary coverage lines
    b. Ability to read and interpret policy contracts including coverages, exclusions, conditions and limitations.

2. Knowledge of policy and product specifics by jurisdiction, for all jurisdictions where the agent/broker will be licensed to offer insurance.

3. Ability to manage complex commercial and speciality insurance coverages is expected at higher licensing levels.

4. Understanding of regulatory requirements in all jurisdictions where the agent/broker will be licensed; general knowledge of the regulatory regimes of other jurisdictions.

5. Knowledge of licensing regulations and codes of conduct.

6. Expertise in professional ethics and ethical decision making; coaching on ethical issues

7. Understanding of privacy act requirements and the ability to apply principles of privacy to protect consumer information.

8. General industry knowledge, including the roles and responsibilities of intermediaries, insurers, claims and underwriting staff.

9. Trained to spot and avoid potential errors, omissions and ethical complications.

10. Ability to remain current and to communicate legislative, industry and product changes; and to implement change while managing the impact on consumers and policyholders.

11. Capable of critical thinking and to communicate while offering empathy, customer service, sales guidance; knowledge of documentation requirements.

12. Ability to identify client exposures and apply risk management principles.

Level Two:

All of the skills and competencies required for Level One plus the learning required to handle more complex commercial and speciality commercial coverages along with supervisory skills.

Level Three:

All of the skills and competencies from Levels One and Two, plus in-depth knowledge of privacy laws, provincial licensing regulations, codes of conduct, ethics, HR practices and fiduciary responsibilities. Operating at this level also requires knowledge of industry metrics and principles, and the ability to apply management and leadership best practices.

6) How much value would there be to your organization and or the industry to standardizing?

Curriculum and skill requirements for licensing broker and agents are similar across the country. Therefore closing the gap that permits a Balkanized approach to licensing would be effective and of value to the industry.

Due to The Institute's national footprint, our curriculum already teaches broad national themes, and provincial legislative variances are addressed by incorporating modules as detailed previously.

For many years all of our designation programs have carried a national standard. Every student in any of The Institute's courses, regardless of the location in Canada or around the world, writes the same exam which is graded by the same marking system. Our marking, once manual, was upgraded in 2017 with a computer-based examinations platform that continues to guarantee The Institute's national standard, but in a more student-centric and efficient manner than can be accomplished by hand.

As an Institute, we take a comprehensive approach to our students' education, testing and success. So we are eager to note that standardization would allow for additional portability of credentials, something we believe to be of great value to our community.

7) What challenges do you see in harmonizing the educational qualifications?

Once the regulatory and jurisdictional issues are resolved and a path has been cleared, The Insurance Institute does not foresee any serious difficulty harmonizing educational qualifications.

Our own testing and educational products are established, scalable and applicable to all classes of industry functions so projecting our own approach beyond the existing national footprint, for instance, would be quickly managed, allowing the benefits of a single set of national standards to rise up.

Since 1952, the Insurance Institute of Canada has been examining its students to the same standard regardless of their location in our national network. The benefits in terms of efficiency and student satisfaction are worth pursuing for all involved.

8) What features of the Life Licence should be included?

The Insurance Institute recommends the following from Life Licence:

1. Completion of a competency profile for brokers and one for agents.
2. The use of qualified education providers to deliver approved course material and exams.
3. Certification of successful completion by qualified education providers.

9) Engagement in the review process

From The Insurance Institute's point of view, and in the interests of our large community of students and graduates, it is essential that we are full and active participants in the review process:

- We represent a student and graduate body numbering almost 40,000 people. This represents half of the trained personnel at work in the industry today.
- Each year we contribute another 1,000 graduates to that total.
- Our community has acquired its education and testing in locations across the country. In terms of reach, scope and impact, The Insurance Institute is as close as Canada comes at the moment to a national standard for educating insurance industry professionals.

While we would be pleased to be deeply engaged in this effort, we also believe that it is our duty to seek a significant role and to share all that we have learned about national education and testing, while benefiting from the learning shared by others.

10) In Closing

At our outset The Insurance Institute of Canada was established to help build and maintain standards for the insurance industry; standards that would prioritize customer protection and assurance.

So we encourage CISRO and the GILQR committee in their work of finding greater harmony and standardization for Canada's insurance licensing process.

Over the decades, we have continually positioned our licensing education and exams to meet the changing needs of the consumer and the industry, and as the industry's educator, we are well prepared to adjust and support our regulatory and insurance industry partners in order to improve service and assurance for the consumer.

Thank you for the opportunity to participate in this important process.



Peter Hohman, MBA, FCIP, ICD.D
President & CEO
The Insurance Institute of Canada
General Manager
The Insurance Institute of Ontario

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ILScorp Response

1. As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?

   It is the opinion of ILS Learning Corporation that there are significant updates which would be beneficial to the current educational requirements. In our opinion the BC, Manitoba and Saskatchewan models are the leading options currently as they are harmonized between the three provinces. Having said that, our former President Steve Hawrishok, who wrote the 4 course CAIB licensing program has advised that when he wrote CAIB 1 it was meant to be a post-licensing course. We respectfully feel it should be a post-licensing course and not qualify for Level 1 licensing status, specifically as it deals with commercial insurance topics, such as agriculture, which are outside the scope of a Level 1 license. We like the current licensing design document which the AIC uses BUT we feel that the material is too robust in scope for students to master effectively (hence the low pass rate for licensing exams in Alberta). Perhaps results could be improved if a more modular approach was used to allow students the time needed to master areas before moving on. We are not sold on the benefit of CAIB 4 to the general public as it relates to licensing. We also feel that a greater emphasis should be directed towards ethics and application of Council rules and regulations.

2. What works well within the current framework?

   The combination of licensing education with mandatory CE has provided a culture of continuous learning which we feel has been a benefit to the Canadian insurance buying public.

3. How could the current frameworks be improved?

   We believe harmonization would be an improvement to the current system along with course content updating and introducing additional training on applied ethics and Council rules.

4. Should there be minimum education and/or experience requirements before individuals enter the insurance industry?

   Undecided

5. What skills, knowledge and/or competencies should a broker or agent have.

   See Appendix 1.

6. How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions?

   It would simplify general insurance licensing in Canada and allow a harmonized platform for additional education within all provinces.

7. What challenges do you see in harmonizing educational qualifications?

   Stakeholder Agreement.

8. Program for life insurance licensees (LLQP). The program included the following features:

- Completion of a uniform Competency Profile
- A common Curriculum
- Standardized course materials
- The use of Accredited Course Providers to deliver the course material
- Certification of successful completion of the study course by Accredited Course Providers
- A uniform regulator-delivered examination
- An open book examination

We think that all aspects of this licensing qualification regime could be applied to the general insurance education with the exception of provincial automobile. We also strongly feel that a nationalized code of responsibility be established, tested, and enforced.

9. How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g. frequency, touchpoints, means of engagement)?

   Important that regular updates are given with means of feedback established, frequency and touchpoints should be devised to correlate with progress of project.



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1. Insurance principles and practice

This competency is about an individual's knowledge and understanding of the core principles of insurance and how this is applied on a day to day basis.

Level 1	Level 2	Level 3	Level 4
• Knows the meaning of the principles of insurance, such as utmost good faith, insurable interest, indemnity, contribution, subrogation and proximate cause • Knows the difference between fundamental and particular risks • Demonstrates an understanding of homogenous risks and the operation of the insurance pool .	• Applies the core principles of insurance to everyday situations *(e.g. advising on the scope of policy cover, identifying potential claims and arranging insurance that meets customer needs)*.	• Demonstrates an understanding of how a range of situations may be affected by the principles of insurance • Applies the principles of insurance to complex situations *(e.g. a policyholder's failure to notify relevant information about changes to a risk or a change in a policyholder's circumstances, major events such as extreme adverse weather, earthquake or terrorism)*.	• Applies concepts, theories and ideas to respond to new and emerging situations that may be affected by the principles of insurance *(e.g. in relation to underwriting of new and emerging risks, environment and society changes, the handling of the impact of natural hazards and epidemics)* • Makes strategic decisions about situations that are affected by the principles of insurance to support business objectives.

2. Insurance products and services

This competency is about an individual's knowledge and understanding of the range of insurance products and services available in the market and how that knowledge can be used to meet client needs.

Level 1	Level 2	Level 3	Level 4
• Knows the cover provided by different types of insurance *(e.g. liability insurance, motor and property insurance)* • Knows the meaning of common policy terms and conditions *(such as excesses and exclusions)* • Knows the features that can affect the underwriting and pricing of insurance products • Knows the range of non-insurance services which are available.	• Demonstrates an understanding of standard policy wordings, extensions and limitations • Identifies which types of insurance products and services are appropriate to a limited range of contexts/situations *(e.g. the purchase of a new home or setting up a business)* • Knows the reasons for applying specific terms, exclusions, conditions and warranties to a policy. • Able to explain why a range of everyday situations would not be covered by a policy *(e.g. due to an excluded peril or breach of policy condition by a policyholder)* • Identifies and resolves dual insurance issues • Demonstrates an awareness of competitors' comparable products and services and their pricing.	• Demonstrates an in-depth understanding of both standard and nonstandard policy wordings, extensions and limitations • Analyses and evaluates which insurance products and services could meet complex client needs *(e.g. multi and international locations, 'high risk' rated activities or a customer with an adverse claim history)* • Identifies when to alter policy terms and the impact of doing so *(e.g. exclusions or excesses).*	• Evaluates the changes required to insurance products and services in response to – – Changes in consumer expectations, company strategy, legislation, regulations and ethical standards – environmental and societal changes; and – the impact of improved technology *(e.g. the use of smart app phones)* • Uses specialist knowledge of insurance products and services to meet complex client needs.

3. Legal knowledge

This competency is about an individual's knowledge and understanding of the different types of law and the potential impact on their role, including:

- contract law
- the law of agency
- statute law.

Level 1	Level 2	Level 3	Level 4
• Knows which laws can affect insurance practice *(e.g., Financial Crime including Anti-Money Laundering, Privacy legislation) etc.* • Knows how insurance can meet a specific legal liability • Able to list the requirements for a valid insurance contract *(e.g. offer and acceptance, consideration, legality and capacity)* • Demonstrates an understanding of what is meant by the law of torts and how legal liabilities arise in the context of insurance *(e.g. negligence, nuisance and trespass).*	• Applies knowledge of what is needed for an insurance contract to be legally valid in a range of everyday situations • Able to explain the relevance of the law to insurance and how this can affect the relationship with a customer • Demonstrates an understanding of the difference between civil and criminal law and the associated legal processes, cost implications and appeals procedures • Able to explain how relevant legislation impacts upon the cover provided	• Identifies and assesses potential legal liability for a situation and recognizes which specific insurance products will address the potential liability • Assesses whether organizational processes and procedures and those that follow them are compliant with legal requirements	• Analyses the impact of new or changing legislation and legal practice on policy cover, legal liability and insurance practice and procedures • Makes recommendations to reduce the potential liability of insurers in given situations *(e.g. imposing financial limits/terms on policy scope and/ or arranging reinsurance).*

4. Compliance and operational risk knowledge

This competency is about an individual's knowledge and understanding of regulatory requirements and how to meet these on a day to day basis. It is also about understanding the concept of operational risk and how this is controlled within organizations.

Level 1	Level 2	Level 3	Level 4
• Knows the purpose of insurance regulation and which authority is responsible for insurance supervision • Knows how to comply with insurance regulation within own job role • Demonstrates an understanding of why capital adequacy and solvency are important • Knows organizational complaint processes and the timescales that must be adhered to • Gives examples of ways to ensure that a customer is treated fairly • Demonstrates an understanding how claims reserving can impact on the solvency of insurers.	• Demonstrates an understanding of what underwriting capacity is • Able to describe what an insurance rating agency does • Able to describe what operational risk is • Demonstrates an understanding of the role of the regulator and their powers) • Demonstrates an understanding of complaints handling regulations • Applies the regulatory requirements for conduct of business in own organization within a limited range of contexts/situations • Able to explain conflict of interest and the potential consequences for a customer • Gives examples of regulatory requirements for the conduct of business • Able to explain enterprise risk management	• Monitors compliance with conduct of business regulatory requirements • Knows what is and is not ethical behavior *(e.g. when selling insurance and handling claims)* • Knows the systems and controls in place in own organization to support enterprise risk management and protect customers • Knows the insurer rating and related security guidelines for own organization • Demonstrates an understanding of the concept of corporate governance as it applies to own organization	• Analyses the impact on business processes of changes to regulatory rules and guidelines • Identifies behavior that does not meet ethical or regulatory standards • Ensures that all employees are aware of legal, regulatory and compliance requirements and that processes and procedures are in place to manage any breaches of these • Monitors systems, communications and controls in own organization and takes the appropriate action if the required standards are not met

5. Assessing and transferring risk

Level 1	Level 2	Level 3	Level 4
• Knows the core principles of underwriting in relation to the transfer of risk *(e.g. the insurance pool, material facts, perils and hazards and the premium)* • Able to describe the structure and inter-relationships of the insurance market in relation to the transfer of risk *(e.g. the role of insurers, intermediaries and reinsurers)* • Demonstrates an understanding of different risk profiles *(e.g. higher risk situations and businesses).*	• Able to explain how the core principles of underwriting apply to everyday situations *(e.g. able to identify a material fact and explain how this could affect the insurance cover)* • Able to explain why a particular condition applies to a risk *(e.g. why a customer has an exclusion or a higher excess)* • Able to explain the purpose and types of reinsurance and when they are used *(e.g. facultative and treaty)* • Demonstrates an understanding of the role and importance of risk control and risk improvements.	• Knows how reinsurance and other risk transfer options are arranged and what impact the risk profile, accumulation risk and company authority limits can have on reinsurance arrangements • Able to explain what a captive is and how it is used • Knows the ways in which accumulation risk can be managed *(e.g. catastrophe cover for hurricane or earthquake).*	• Able to explain the importance of monitoring authority limits to ensure a consistent approach • Knows how limits of existing risk exposure and modelling techniques are assessed and evaluated • Knows how appropriate products and approaches to managing risk exposure are identified *(e.g. for individual customers or areas of the business)* • Demonstrates an understanding of the impact of complex technical scenarios and the effect of specific risk transfer solutions on an insurer *(e.g. alternative risk transfer on an account).*

6. Claims knowledge (only applicable to those whose main role is not claims handling/management)

Level 1	Level 2	Level 3	Level 4
• Knows the core principles of insurance that apply to claims processing *(e.g. proximate cause, indemnity, subrogation)* • Knows the key information required to process a claim and why this is needed *(e.g. date of claim in relation to policy cover dates)* • Able to describe the stages of the claims process and the roles of the parties involved *(e.g. the role of a loss adjuster, claims service providers).*	• Knows how to identify whether a policy is in force and the next steps in processing a claim notification • Knows which exclusions and policy conditions are standard and which are non-standard on a policy • Able to explain the ways that fraud may be committed by customers and knows common fraud indicators • Able to explain how the principles of insurance apply to different types of straightforward claims *(e.g. indemnity, subrogation and contribution)* • Knows the reason for claims reserving and the implications of inaccurate reserving *(e.g. under or over reserving).*	• Knows how claims are managed based on set parameters and authority levels *(e.g. by class of business, type of claim, below a set financial limit)* • Knows how a claim is assessed to identify if it requires specialist handling and the resultant claims management process *(e.g. fraud suspicions, a large loss)* • Knows how claims reserving techniques are used and how to assess whether a claim reserve is accurate.	• Knows how the claims notification, investigation and settlement process is managed for a large and/or complex claim • Able to explain the importance and purpose of the negotiation and arbitration process in relation to claims management • Knows the importance of the claims reserving process being 'fit for purpose' and the potential implications for an insurer *(e.g. inaccurate reserving)* • Able to identify the impact on claims handling following changes to underwriting policy, products or cover and make recommendations to support the business objectives.

7. Underwriting and pricing the risk (only applicable to those whose main role is not underwriting)

Level 1	Level 2	Level 3	Level 4
• Knows the key information required to underwrite a risk and why this information is required *(e.g. details of the risk (including the insured persons), special features, claims history, policy start date and duration, risk address)* • Able to explain the underwriting and rating factors for different types of risk *(e.g. in motor insurance – garaging location, make and model of car, use and driver details)* • Knows the reasons for applying non-standard policy terms *(e.g. a flood exclusion)* • Able to explain the meaning of insurable interest and the subject matter of insurance *(for example, who and what can be covered by particular types of policy).*	• Knows how to calculate indemnity values and alternatives to this, for different types of policy *(for example, the sum insured for property insurance)* • Demonstrates an understanding of when standard policy terms and conditions would apply to a risk and when special terms would be required or a risk declined • Able to explain the reasons for increases or decreases in premium in relation to straightforward risks • Able to explain different policy cover options and how they affect the underwriting and pricing process • Knows when additional information may be required to make a decision on risk acceptance or continuance of cover *(e.g. surveyor reports, claim history)* • Demonstrates an understanding of authority levels and restrictions on scope of business a company is authorized to underwrite • Knows what documentation is required for different types of risk *(e.g. policy document, schedule, certificates, declarations).*	• Knows how cover terms and premiums are determined for complex risks, including the use of underwriting authority levels • Demonstrates an understanding of when and what specialist information is needed to under write complex risks *(e.g. surveyor or engineer reports)* • Knows how underwriting tools and expert advice are used to inform the decision-making process • Knows how 'worst case scenarios' are identified and the steps that can be taken to reduce the risk of these • Knows how customer portfolios are reviewed and how to decide what changes are required to ensure it is profitable and meets customer needs.	• Knows how the underwriting and pricing for portfolios and classes of business are assessed to ensure that these are profitable and meet both stakeholder and customer requirements • Demonstrates an understanding of how changes to underwriting policy are identified and made to improve consistency of underwriting practice and business results • Demonstrates an understanding of the need to identify new products and services to support the development of an organization and to meet its business objectives.

8. Company and market knowledge

This competency is about an individual's knowledge and understanding of:

- their own organization
- the wider insurance market place and how this is applied on day-to-day basis.

Level 1	Level 2	Level 3	Level 4
• Knows the overall structure of the insurance market and the location of the company within this structure • Knows the processes, procedures and documentation common to that part of the market, which are relevant to own job role • Knows the organizational structure of the company and how this supports its business activities • Knows the company business, goals and mission statement • Knows the company values • Able to state how own role fits into the overall business operations and how it interacts with other areas of the business	• Applies knowledge of the market structure and its processes, procedures and documentation within a limited range of contexts/situations • Demonstrates an understanding of the company's key business objectives and how own role contributes to these • Able to identify the external factors which can affect company results	• Applies knowledge of the market structure and its processes, procedures and documentation in a range of complex and/or unfamiliar situations • Acts as a role model to others for conducting business in accordance to company rules in an ethical manner • Demonstrates an understanding of the impact of changes in the insurance market, including regulatory and legislative changes and modifies working practices accordingly • Identifies and proposes business process improvements.	• Anticipates how the business may be affected by external changes *(for example, regulatory and legislative changes, economic trends, market developments and social and demographic changes)* and reviews business objectives and/or working practices accordingly • Demonstrates an understanding of how to manage business ethics and any conflicts that may arise.

9. Understanding the customer

This competency is about the importance of an individual knowing about and understanding their customers in order to best meet their needs. It recognizes that customers can be both within and external to an organization.

Level 1	Level 2	Level 3	Level 4
• Knows the meaning of internal and external 'customers' • Knows what a complaint is and when it should be referred • Knows the importance of understanding the customer when giving information or advice • Knows the importance of positive customer experiences in developing good relationships • Able to list the factors affecting the attraction and retention of customers • Knows what good customer service looks like • Demonstrates an understanding of why customers complain and the impact of complaints on the business • Knows the ways in which relationships with customers can be improved and how their expectations can be managed • Able to state the importance of customer feedback.	• Demonstrates an understanding of the issues and concerns which affect both internal and external 'customers' and applies that knowledge to develop and maintain positive customer relationships • Gathers information about the customer and uses this effectively to meet their needs • Demonstrates an understanding of the need to balance the requirements of both the customer and the organization and able to apply that knowledge to everyday situations • Acts as a role model in providing excellent customer service through understanding the customer • Demonstrates an understanding of the factors that can cause conflict with customers and the ways in which conflict can be diffused • Gathers customer feedback and communicates this to others • Demonstrates an understanding of the impact of own actions on the customer relationship and identifies opportunities to improve the customer relationship.	• Manages customer expectations effectively • Demonstrates an understanding of the need to balance the requirements of both the customer and the organization and able to apply that knowledge to a range of more complex situations • Able to explain how positive and negative customer experiences can impact other areas of the business • Analyses customer feedback to decide which should be acted on and uses this to improve relationships with customers • Takes action to improve their liability of customer service based on specific customer feedback • Supports colleagues so that they are empowered to resolve customer issues within organization guidelines.	• Analyses the customer base to ensure that the products and services offered by the company continue to meet their needs • Challenges existing processes and procedures to improve the customer experience • Develops and enhances customer relationships at all levels both within the company and with external customers • Demonstrates an understanding of the customer service standards and culture of the company and ensures their delivery within own area of responsibility • Undertakes a route cause analysis of customer complaints and takes appropriate corrective action to prevent recurrence • Pro-actively seek customer feedback using both new and existing tools and follows upon this feedback through the correct channels • Analyses and evaluates patterns in customer feedback to identify where customer service and customer loyalty can be improved • Diffuses conflict with customers effectively, including situations referred by colleagues.

10. Communication skills

This competency is about an individual understanding the importance of communicating effectively and being able to select and use the most appropriate means of communication from a range of methods and styles.

Level 1	Level 2	Level 3	Level 4
• Demonstrates an understanding of the importance of good communication and the negative effects of poor communication • Able to list the different methods of communication and when they would be used • Knows the principles for communicating effectively verbally, in writing and electronically • Knows the company standards and procedures for communicating with others.	• Communicates effectively verbally, in writing and electronically with colleagues and customers using everyday methods of communication *(e.g. letters, email, the telephone and web chat)* • Presents information clearly, concisely and accurately in accordance with company standards • Demonstrates an understanding of the barriers to good communication and how these can be overcome • Identifies and uses the best method of communication in a variety of everyday situations • Uses listening and questioning techniques effectively to gather information and to check the other party's understanding • Provides clear information to other team members and more senior colleagues as required, to support their communication with others.	• Uses communication skills in a thorough and effective manner to manage own area of responsibility • Determines the essential and desirable content of communications with others (including conflict resolution) • Demonstrates an understanding of how non-verbal communication skills can affect business relationships and is able to use these effectively • Presents information accurately and effectively using more complex communication methods, such as reports and presentations • Conducts effective meetings, maintaining documented records of agreed actions, detailing owners and timescales • Demonstrates an understanding of the need to justify decisions to others and to communicate clearly the reasons for these • Identifies the target audience for communications and resources • Adapts communications and resources to take account of the target audience, including less experienced colleagues.	• Demonstrates advanced communication skills to enhance the business function • Critically reviews documents produced by self and others for accuracy, clarity and content • Uses communication skills to make recommendations and to influence company strategy • Demonstrates an ability to communicate accurately and effectively both internally and externally at all levels • Provides a rationale for business decisions at operational and/or strategic level and to communicate this to others. • Delivers formal reporting as required by the business • Ensures processes are in place both to gather input from and to disseminate information to employees and to take the action when needed.

11. Management of information

This competency is about how to gather, analyze, manage and store information effectively and securely.

Level 1	Level 2	Level 3	Level 4
• Knows how to understand information • Knows how to keep accurate and complete records of communications and business transactions in accordance with company procedures • Demonstrates an understanding of the significance of gathering sufficient information for the findings of any analysis to be valid • Demonstrates an understanding of the importance of and knows how to maintain the confidentiality and security of information • Knows how bespoke in house IT systems are used to record and store information.	• Understands straightforward information and reaches conclusions in a variety of everyday situations • Provides data to others at intervals as required by job role and on an ad-hoc basis, to support key decision-making processes of more senior colleagues • Keeps accurate and complete records of communications and business transactions in accordance with company procedures • Keeps information confidential and secure and understands the implications of not doing this • Uses bespoke in-house IT systems to record and store information accurately and effectively.	• Establishes and maintains data and information records which are sufficient for own purposes and which meet company, legal and regulatory requirements • Demonstrates an understanding of the implications of not keeping accurate and complete records for both the company and its customers • Understand both internal and external data and evaluates how to use this effectively within own job role • Obtains, interprets and analyses relevant data and reaches conclusions in a range of complex and/or unfamiliar situations • Uses both bespoke in-house IT systems and common external software to gather, analyze and store information accurately and effectively.	• Develops and uses appropriate internal and external software packages to obtain and analyze management information • Obtains and analyses relevant data to reach conclusions in support of recommendations for change at operational and/or strategic level • Uses data analysis to assess the impact of past decisions at operational and/or strategic level • Evaluates trends in data and uses data for business reporting and to produce forecasts • Critically evaluates analysis of information produced by others • Contributes to the development of organizational strategy for file management.

12. The role and responsibilities of intermediaries

This competency is about knowledge and understanding of the role and responsibilities of the intermediary in relation to both their client and product providers.

Level 1	Level 2	Level 3	Level 4
• Demonstrates an understanding of the role of an intermediary in meeting client needs • Demonstrates an understanding of the different types of intermediary and the service they provide • Knows the difference between giving advice and giving information • Able to describe the intermediary's duties when acting as an agent of the customer • Able to describe the intermediary's duties when acting as an agent of the product provider • Knows the different ways in which intermediaries are remunerated.	• Knows the responsibilities that an intermediary has when selecting a product provider • Knows the issues which should be taken into account when selecting product providers for straightforward risks and follows organizational policies and procedures in relation to these • Able to describe the different stages of the insurance service and sales process • Knows the different ways in which intermediaries are remunerated.	• Knows the potential conflicts of interest for different types of intermediary remuneration *(eg. commission, fees, bonuses, profit share agreements)* • Able to describe the role and responsibilities of the intermediary at each stage of the annual client service cycle • Knows the issues which should be taken into account when selecting product providers to place business for complex risks and follows organizational policies and procedures in relation to these • Knows the role of the intermediary in the event of insurer failure or an insurer discontinuing a line of business and follows organizational procedures in relation to this • Knows the role of the insurance intermediary in the risk management process.	• Analyses product provider results and ratings in order to make recommendations that are mutually beneficial for clients and own organization • Identifies and anticipates changes to product ranges and market requirements and recommends appropriate action • Demonstrates an understanding of the requirements for insurance broking accounts and the need for segregation and identification of client money • Makes recommendations for the annual client service cycle, including what it should contain and what is considered best practice • Evaluates the different forms of intermediary remuneration and when these should be used within own area of business.

13. Negotiation and placement of risks

This competency is about the knowledge and understanding of the information needed to place risks and how these are applied on a day to day basis.

Level 1	Level 2	Level 3	Level 4
• Knows the importance of the intermediary assessing the needs of a client • Able to identify customer requirements and to identify which products from own organization's offering could support the customer • Knows the organizational policies and procedures for the issue of quotations and what information is needed by product providers for own business area • Knows the possible consequences of not giving customers accurate and up to date information • Able to describe own role and how this can support customer demands and needs • Demonstrates an understanding of how the services provided by own organization can fulfil the customer requirement • Knows the scope of cover, including policy extensions, limitations and exclusions for the classes of business being handled • Knows the organizational policies and procedures for the placement of risks and confirmation of cover to clients.	• Obtains the customer information needed by product providers to provide insurance quotations to meet customer needs for straightforward new and/or existing risks • Evaluates information provided by customers to identify own organization products and services which best meet both the real and perceived needs of customers • Provides quotations for straight forward risks, communicating the key features, benefits, limitations and exclusions of products to customers • Follows organizational policies and procedures and works within own authority limits to place insurance cover to meet customer requirements in a limited range of contexts or situations • Follows own organization's procedures for the referral of risks to stakeholders • Identifies the action required and responds within organization guidelines to customer requests for changes to their insurance arrangements for straightforward risks • Knows the impact of different policy wordings, terms and conditions on the customer's scope of cover • Demonstrates an understanding of how binders and delegated authority schemes can be used to place risks within own business area.	• Able to analyze customer situations with complex demands and needs and identify product and service solutions to meet their needs • Prepares accurate and complete market presentations to obtain quotations for complex risks • Interprets customer claims history, identifies trends and patterns and makes recommendations to product providers to control the risk presented • Optimizes solutions for customers through knowledge of product ranges, product providers, market requirements and client needs • Provides accurate and complete information to customers regarding proposed insurance arrangements for complex risks, identifying the potential advantages and disadvantages for the customer • Explains to the customer any policy terms and conditions *(eg. policy conditions and warranties, risk improvements requirements and co-insurance clauses)* • Knows the importance and implications of surveys in the negotiation and placement of risks • Identifies premium savings for customers through risk management options and/or changes to policy cover, terms and conditions • Follows organizational policies and procedures and works within own authority limits to place insurance cover to meet customer requirements for complex risks • Monitors the operation of delegated authority agreements, binding authorities and or scheme arrangements to ensure that prescribed procedures are being followed.	• Provides comprehensive guidance to customers who have complex requirements, including risk transfer and risk mitigation options • Assesses customers future needs and service requirements within own area of business and proactively responds to these • Analyses options available for customer portfolios and confidently makes recommendations, in accordance with legal and regulatory requirements and organizational policy, to the benefit of the customer • Identifies instances and the causes of errors and omissions and takes action to prevent a recurrence of these.

14. Operations

Level 1	Level 2	Level 3	Level 4
• Knows the key pieces of information needed to process a new application, renewal, cancellation and/or alteration to an existing risk for own area of the business • Identifies any further information which is required • Knows the organizational policies and procedures for processing a new application, renewal, cancellation and/or an alteration to an existing risk for own area of the business • Knows what information and documents must be issued for the classes of business being handled • Demonstrates an understanding of the role of the intermediary in the issue of policy wordings • Knows the organizational policies and procedures (including timescales) for the issue of documentation • Knows the significance of the premium payment and the different premium payment options available to customers • Knows own authority limits and own organization's referral process.	• Identifies and assesses the information provided in relation to the processing of new and existing risks in a limited range of contexts or situations • Identifies and obtains any missing information • Follows own organization's guidelines for referral of risks to stakeholders • Follows organizational policies and procedures for the processing of new and existing risks in a limited range of contexts or situations • Identifies, investigates and resolves any issues that arise • Processes risks in line with authority limits and adheres to organizational referral procedures • Processes premium payment correctly • Demonstrates an understanding of the term 'contract certainty' and the significance of this for intermediaries • Ensures policy and other required documentation are issued to customers in an accurate and timely manner for straightforward risks • Knows how binders and delegated authority schemes operate and follows the operational rules and requirements in relation to these.	• Processes complex risks within own authority limits and in accordance with organizational policies and procedures • Demonstrates a detailed understanding of complex policy wordings, extensions and/or limitations and their interpretation and application can explain the significance of these • Identifies the key considerations to be addressed in the negotiation and drafting of policy wordings • Ensures policy and other required documentation are issued to customers in an accurate and timely manner for complex risks • Monitors the operation of delegated authority agreements, binding authorities and/or scheme arrangements to ensure that prescribed procedures are being followed • Evaluates and reviews the performance of a customer portfolio and makes appropriate recommendations.	• Determines and reviews the policies and procedures for the processing of new and existing risks in own area of business in line with own organization's strategy • Identifies process improvements and implements these in line with organizational strategy and market agreements • Monitors and reviews the company referral process in relation to the processing of new and existing risks • Acts as a referral point for potential operational issues within own organization.

Comments from Professional Development Training Center Inc. (PDTC)

The Committee has developed the following questions in order to stimulate discussion and thought. Please feel free to provide as much or as little detail as you deem appropriate.

1. As noted in the Appendix, jurisdictions have taken different approaches to licensing education. In your opinion, what should the educational requirements for general insurance licensing look like?

- no specific pre-requisite required. We welcome people into our industry who can make a nice living and career without grade 12 or post-secondary. Some reading comprehension is necessary, but the exam process should weed through those. The examination should remain difficult, but fair, testing insurance knowledge. No change required.

2. What works well within the current frameworks?

   - No specific prerequisite required. We welcome all cultures and educational backgrounds. If you were to take a cross-section of licensed for more than 6 years, many would not have post-secondary background. The ones who do, likely less years on average in the industry

3. How could the current frameworks be improved?

   - Make the exams challenging in a different way. Remove the 20% Industry Knowledge pieces from Level 1 Alberta Exams and test on insurance specific questions, like the exams were from 2012 – 2014. Remove 50% of Broker conduct questions and test only on insurance policy wordings and Code of Conduct.
   -
   - Our industry has the perfect avenue to influence broker culture, industry knowledge and comprehension of Broker Conduct + specialty market information through CE credit required courses per annum. Make the development into the industry technical knowledge and broker conduct development mandatory through Continuing Education sessions. Each year, all provinces require certain development, Example: 2 hrs required broker code of conduct and 4 hours Technical knowledge updates with proof of same to renew license.
     Examples:
     2019 : PIPEDA, PIPA, Confidentiality requirements + Surety and Fidelity bonding
     2020: Fee Disclosure, Trust and General Accounts + Farm Liability, Animal mortality

   - All of this would add value to the CE process, which has become far to devalued and too easy to take a ½ hour course through an online provider and gain 15 hours for doing so. This is not appropriately audited, so has devalued the Continuing Education process

4. Should there be minimum education and/or experience requirements before individuals enter the insurance industry (e.g., high school/CEGEP, work experience, etc.)?
   - No – see above comments.

5. What skills, knowledge and/or competencies should a broker or agent have?
   - No pre- requisite, but managed through a fair but difficult examination process. The current Alberta Insurance Council exam content is not accurately attracting the skilled candidate who will succeed in our industry

6. How much value would there be to your organization and/or to the industry in harmonizing educational qualifications between jurisdictions? Please elaborate.

- Not necessarily advantageous to our organization, but advantages to our industry would be some harmonization across Provinces and Territories.
- My recommendation is to make the examination processes consistent in terms of Property, Liability, Commercial and General Insurance knowledge.
- Each territorial area would have its own content for automobile insurance with specific knowledge to their policy wording.
- When a person has an extra-provincial license (more than one province) or when they move from one province to another, there is a manatory auto examination required to build skills and qualify in that area. This is the portion of the policy wordings that really differ by province

7. What challenges do you see in harmonizing educational qualifications?
   - I see no challenges other than the decision on content in common nationally

     As stated above:
   - My recommendation is to make the examination processes consistent in terms of Property, Liability, Commercial and General Insurance knowledge.
   - Each territorial area would have its own content for automobile insurance with specific knowledge to their policy wording.
   - When a person has an extra-provincial license (more than one province) or when they move from one province to another, there is a manatory auto examination required to build skills and qualify in that area. This is the portion of the policy wordings that really differ by province

   - As far as challenges, the examination in BC for instance is far too easy to attract the Career Insurance professional. Alberta should be more of an insurance exam and not so much Broker Ethics, however, a common theme across Canada would be of value.

8. In 2016, CISRO members introduced an updated version of the Life Licence Qualification Program for life insurance licensees (LLQP). The program included the following features:

☐ Completion of a uniform Competency Profile,
☐ A common Curriculum,
☐ Standardized course material,
☐ The use of Accredited Course Providers to deliver the course material
☐ Certification of successful completion of the study course by Accredited Course Providers.
☐ A uniform regulator-delivered examination.
☐ A modular approach to the course material and examination
☐ An open-book examination

Are there aspects of this licensing qualification regime that could be applied to general insurance education? Which would or would not be applicable?

No ☐ Completion of a uniform Competency Profile,
** Yes☐ A common Curriculum,
** Yes ☐ Standardized course material,
** Yes ☐ The use of Accredited Course Providers to deliver the course material
** Yes ☐ Certification of successful completion of the study course by Accredited Course Providers.
** Yes☐ A uniform regulator-delivered examination.
No ☐ A modular approach to the course material and examination
No ☐ An open-book examination

8. How would you suggest that the Committee engage with general insurance stakeholders as this review progresses (e.g., frequency, touchpoints, means of engagement)?

    - Form a committee with current top-ranked course providers of General Licensing per province, not only IBAC (IBAA) and IIC. Take those with the best passing grades to survey what is working and their opinions of what should be tested. (eg: Providers in AB, ON and Eastern Canada with best results on General licensing results)
    - Engage those few from each Province to share very specific content that they feel should be tested
    - Hold focus group with exam writers who successfully passed Level 1 licensing and Level 2 licensing exams in past two years. Only include persons achieving over 80% on the exam to see what they believe should have / should not have been tested on the exam. Ask their opinion re: key pieces that should be tested, what not to test and how to transition
    - Prepare one auto exam per province (minimum 40 questions)
    - Qualify Course providers based on their successes.

10. Please provide any other comments you wish to share with the Committee that you believe are relevant to this review.

I know it has been mentioned, but I truly believe that we are missing a valuable development opportunity through the current CE process. We should add value to the process by making CE Credit content of importance. This, paired with a fair examination process will assist the goal of having well-trained professional Advisors of Insurance in Canada.

Respectfully submitted,

Jane Davis, CIP

Professional Development Training Center Inc.

From: Alain Gauthier <alain@clickplay2learn.com>
Sent: Thursday, August 30, 2018 5:33 PM
To: CISRO-OCRA
Cc: Stephen Forbes; Anthonet Maramieri
Subject: CISRO GILQR Invitation to Comment

Good day,

I am writing to you today to comment on the topic of harmonizing the education and licensing requirements for General Insurance Agents and Brokers across Canada.

My answers come from the perspectives of an approved course provider, and my expertise is in curriculum development and course design in the area of Adult Education. I also taught the Levels 1 & 2 Licensing Exam Preparation courses for Alberta since 2008 in the classroom and via our online courses at ClickPlay2Learn.com.

I will answers the questions in the order they are presented in the Invitation to Comment document.

1. Licensing education should be the same with appendices to cover areas of differences between jurisdictions. i.e.; auto ins., Gov. Ins coverage, etc.
1. A licensee should be able to work in any province, once he or she has completed any additional training required. It is counterproductive to the industry to have great agents from one region not be able to transfer to another region.
2. The licensing exam should be fair.
2. It is easier to manage by jurisdiction and protects the local agents/brokers.
3. Make entry-level easier, and with modular exams and levels requirements completed, allow the agent to do more (have more responsibility).
4. High School + work experience to graduate to the next licensing levels.
5. Based on each level of licensing.
6. We could develop one set of modules and add-ons to fit the education requirements across Canada.
7. Reformatting of our current online course programs. And, add new modules to fill the education need for the regions other than Alberta. We currently only deliver the Alberta Licensing Courses.
8. Answers for this one below:

1. Applicable
2. Applicable
3. Applicable
4. Applicable
5. Applicable, mandatory quizzes to prove completion
6. Applicable, using CBT
7. Applicable
8. Applicable, if so, then with time limit reduced from 2 hours to 90 min. The issue would also be on what 'books' would be allowed. Would electronic devices be allowed? It would be difficult to prevent cheating.

9. Monthly, Regional Meeting, Webinars or Teleconference across regions with National events (Meeting, Webinars or Teleconference) every quarter.
10. The industry is ageing and the licensing process should not be an unfair barrier to entry for young professionals. Trust the employers to make the right hiring decisions and continue training on-the-job. Maybe regulate Continuing Education Providers so that they have to show quality education is delivered. Maybe CE courses are too easy to circumvent and the learners do not learn. Permit Live Webinars for the delivery of CE courses, this would ensure that the active participation of attendees is required to get the CE credits.

I hope the format for this document is acceptable.

Thank you for inviting us to participate.

Alain Gauthier, RPT
Founder, Developer & Producer
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