



31 July 2020

Mr. Brett Thibault
Director, Governance & Stakeholder Engagement
Insurance Council of BC
Suite 300–1040 West Georgia Street
P.O. Box 7
Vancouver, BC, V6E 4H1

consultation@insurancecouncilofbc.com

Dear Mr. Thibault,

Re: Continuing Education Guidelines – Program for General Insurance Agents and Salespersons

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 comment on the Insurance Council of BC's (the Council's) draft Continuing Education Guidelines, particularly those that apply to general insurance agents and salespeople. CADRI is supportive of the changes proposed and compliments the Council on its approach.

CADRI members are national entities with structured, tiered staffing models to ensure excellent supervision of all employee and exclusive agents. Prior to contacting customers, agents undergo thorough background checks and rigorous training to ensure compliance with regulations, company policies and delivery on customer service commitments. After licensing, agents continuously update their skills and knowledge. Thus, the very nature of direct-relationship insurers' corporate structures and internal controls is to ensure that they comply with regulatory frameworks and protect consumers' interests.

CADRI welcomes the changes proposed by the Council in part because they are more closely aligned with other jurisdictions across Canada.

We also appreciate the Council continuing to recognize mandatory continuing education requirements that are undertaken in a non-resident's home jurisdiction.

In addition, standardizing the number of hours required by agents – no matter their years of experience – will simplify supervisors' efforts to ensure that all agents licensed to serve BC customers fulfill their regulatory obligations for continuing education.

The modifications pertaining to claiming partial credits, carrying over up to one year's worth of credits and eliminating daily maximums will provide agents with the flexibility to pursue courses when they have the time to complete them.

In sum, CADRI is fully supportive of these changes and looks forward to working with the Council to ensure a smooth roll out of the new rules in 2021.

Yours sincerely,

A handwritten signature in black ink that reads "Catherine Allman". The signature is written in a cursive, flowing style.

Catherine Allman
VP, Government and External Relations
CADRI

cc:
CADRI Board of Directors
CADRI Licensing Task Force
CADRI Western Committee