



Memorandum

To: CIA members and stakeholders

From: Amy Pun, Chair
Professionalism and Credential Monitoring Board

Date: October 20, 2022

Subject: **Final Changes to the *Qualification Standard – Requirements for Continuing Professional Development (CPD)***

Document 222146

Executive summary

The Professionalism and Credential Monitoring Board (PCMB), which was established January 1, 2020, under the oversight of the Actuarial Profession Oversight Board (APOB), is responsible for developing and revising the CIA's professional continuing qualification standards (QS) in accordance with the [CIA Bylaws](#).

Following the recent institutional review of the Bylaws, as well as completion of the 2020–2021 CPD compliance reporting cycle, the PCMB undertook a review of the QS and related procedures to address the required changes related to the new Bylaws, which will come into effect in January 2023, and to determine if any additional improvements or clarifications were needed based on the experience of members and the PCMB during the recent reporting process. Several changes to the QS were proposed, which would take effect in January 2023 for the 2021-2022 reporting cycle. These were circulated to members and stakeholders for consultation this past summer.

The PCMB only received a few comments, many of which were supportive of the proposed changes (see consultation feedback section below). Consequently, no further changes were made to the QS and it was approved by the PCMB on September 14, 2022 with an effective date of January 1, 2023. The final revised QS (with changes red-lined) is being recirculated with this memorandum.

Consultation feedback

The proposed changes to the QS were circulated to members and stakeholders on June 29, 2022, with a comment deadline of August 26, 2022. Seven members submitted comments on various topics. Four of these members were supportive of the proposed changes. Additional comments were related to the following topics:

- **Remedy plan hours** – Members will now be able to count activities undertaken to fulfil a remedy plan in the year in which they are undertaken, rather than only for the previous year solely to fulfil the remedy plan. Previously, these hours could not be counted for the current year, which placed a heavy burden on members to also meet the current year's requirements. It was commented that this could create a loophole for some members to avoid CPD in one year and then submit a

remedy plan the following year for the missing hours, and then use those hours again for the current year's CPD.

The PCMB notes that it does review and approve all remedy plans, and so would be in a position to identify and prevent any ongoing abuse of this process (i.e., by not approving the remedy plan).

It is also the PCMB's view that, to protect the public, the key is to ensure that a member meets the CPD requirements in the current period to maintain up-to-date knowledge relevant to their work. The burden of additional hours is not a requisite.

No changes were made to the QS.

- **Retired members** – Clarification was added to the QS to ensure that members understand what type of work they can do if exempted from the CPD requirements under the retirement category. Members who serve on pension committees and boards of trustees, or on the boards of financial businesses such as banks or insurance companies, as well as volunteers for professional actuarial organizations, should be CPD compliant and would not typically be granted an exemption.

The PCMB understands that some members disagree with this principle and feel that this unduly burdens retired members who wish to give back to the profession. But the PCMB continues to believe that it is in the public interest to consider CPD in this manner. Part of the hours spent serving in these roles would normally produce CPD hours for the members, thus contributing to the fulfilment of the CPD requirements, and particularly, the requirement for “guided” hours. All CIA webcasts are also now available to CIA members at no charge.

In addition to guided CPD activities, these members will also be required to complete the CIA Professionalism Module every two years (a two-to-three-hour commitment), and record their self-study CPD activities which, in PCMB's view, is not an onerous requirement.

No changes were made to the QS.

- **Bias training** – The PCMB included a reference to bias training as an option for CPD hours in the examples of types of CPD (see Appendix A in the QS). It was suggested that this reference be removed since most members will already be exposed to this type of training, and that it should not be offered by the CIA.

For clarification, it was included in the CPD examples to remind members that such training could be used for CPD, and not to indicate that the CIA should necessarily offer such training, although it may, in the future.

No changes were made to the QS.

The remaining comments were on broader CPD topics, suggested areas where we could improve member education, member dues questions, or other topics that were not directly related to the proposed changes to the QS, or under the authority of the PCMB. Where appropriate, these comments were passed on to the relevant entities.

Summary of Changes

The chart below provides an overview of the key changes to the QS, along with additional comments and their rationale as appropriate. Some additional housekeeping and editorial changes are not depicted below, including changes to reference new Bylaw numbering, but are redlined in the enclosed QS.

Section(s) in revised QS	Proposed changes	Additional comments/rationale
Context and purpose	<ul style="list-style-type: none"> Reference to the new Bylaws has been adjusted and the language simplified. 	
Scope	<ul style="list-style-type: none"> Provides clarity regarding applicability to members of bilateral organizations. 	
4.2 a) – Exemptions – Retirement	<ul style="list-style-type: none"> Provides clarity regarding exemption criteria. 	<ul style="list-style-type: none"> Members who serve on pension committees and boards of trustees, or on the boards of financial businesses such as banks or insurance companies, as well as volunteers for professional actuarial organizations, should be CPD compliant and would not typically be granted an exemption.
4.3 and Appendix C – Procedures: Monitoring compliance with the CPD requirements (4.b)	<ul style="list-style-type: none"> Plainly states that exempted members may be selected for an audit. 	<ul style="list-style-type: none"> They would be asked to reconfirm their eligibility for exemption. This was already the case but clarity was added.
5.1 c) – Remedy plan	<ul style="list-style-type: none"> Removed 	<ul style="list-style-type: none"> Members will now be able to count activities undertaken to fulfil a remedy plan in the year in which they are undertaken (rather than only for the previous year solely to fulfil the remedy plan). In cases where a large number of hours are needed as part of a remedy plan, there was a heavy burden on members to also meet the current year's requirements. The PCMB is of the opinion that, to protect the public, the key is to ensure that a member meets the CPD requirements (i.e., 80 hours + the professionalism module in the most recent two calendar years) in the current period. The burden of additional hours is not a requisite.
5.2 a) Failure to report or respond	<ul style="list-style-type: none"> Reference added to address suspended members appearing in online member directories. Reference to the new Bylaws has been adjusted to reflect that a suspended member may only remain suspended for CPD non-compliance for a maximum of one year. 	

<p>5.2 d) Reinstatement</p>	<ul style="list-style-type: none"> • Reference to an administration fee was removed (as redundant) but remains in Appendix C and in the <i>Policy on the Administration of Member Rights and Privileges</i>. • Clarifies that the Education and Qualification Council (EQC) or the CIA Board may impose additional requirements upon reinstatement. 	
<p>6 a) CPD monitoring and verification</p>	<ul style="list-style-type: none"> • Removal of reference to a committee under the PCMB. • Addition of “suspended” as a status in CIA online member directories. 	<ul style="list-style-type: none"> • The PCMB has not established a committee to monitor compliance and does so itself. The procedures can be adjusted in the future if the need for a committee arises. • “Suspended” status is required in CIA online member directories to address the changes to the Bylaws
<p>Appendix A – Types of CPD (Examples)</p>	<ul style="list-style-type: none"> • Addition of examples of CPD that include bias training in relation to diversity, equity, and inclusion (DEI), offered by other organizations. 	<ul style="list-style-type: none"> • This is in line with the CIA’s DEI strategy.
<p>Appendix B – Core professionalism requirements</p>	<ul style="list-style-type: none"> • Reference to the potential inclusion of bias training (i.e., DEI) as part of the professionalism module. 	
<p>Appendix C – Procedures: Monitoring CPD requirements</p>	<ul style="list-style-type: none"> • 3 e) – Change to indicate that attempts to reach members by phone and other extraordinary methods will only take place after the filing deadline. 	<ul style="list-style-type: none"> • Head Office staff currently spends a significant number of hours in the week leading up to the filing deadline, reaching out to 1,200 to 1,800 members to remind them to file. This change will limit reminders to email and website notices prior to the deadline, while permitting extraordinary measures after the deadline but before suspension. This will reduce the staff workload significantly (only 300–400 members typically file after deadline) and support members in avoiding unnecessary suspension.
<p>Appendix C – Procedures: Monitoring compliance with</p>	<ul style="list-style-type: none"> • Reference to a fee is now included, in accordance with the <i>Policy on the</i> 	

the CPD requirements – 3 h)	<i>Administration of Member Rights and Privileges.</i>	
Appendix C – Procedures: Monitoring compliance with the CPD requirements – 3 j)	<ul style="list-style-type: none"> Text added to indicate that a change to the member’s status would be made in the online member directories. 	
Appendix D – Procedures: Applying for an exemption from the CPD requirements – 2 b) and Appendix E – Procedures: Applying for a remedy plan – 2 b)	<ul style="list-style-type: none"> The normal delay to send applications to the PCMB for review was changed from five to 10 days to better reflect the current practice. 	<ul style="list-style-type: none"> The PCMB normally meets every two weeks during the CPD filing period.

Effective Date

The revised QS becomes effective on January 1, 2023, for the 2021-2022 reporting period.

Questions and answers

A series of [questions and answers](#) (Q&As) are provided on the CIA website to help members better understand the CPD requirements. Additional Q&As regarding general CPD and other related enrolment issues are also provided.

Any questions regarding the QS can be directed to cpd.compliance@cia-ica.ca.

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