

Feb. 26, 2025

**VIA EMAIL**

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**RE: Rule Amendments – Request for Comment – Proposal to Harmonize CIRO Continuing Education (“CE”) Programs (the “Consultation”)**

Dear Sir or Madam,

Independent Financial Brokers of Canada (“IFB”) appreciates the opportunity to provide comment on the above captioned consultation. As a professional association representing independent life insurance and mutual fund representatives, IFB has a well-established educational program offering accredited education for a variety of CE requirements, including MFD approved CE. Our comments on the consultation will be from IFB’s perspective as an education provider.

IFB welcomes the initiative to harmonize and simplify the CE rules for IDPC and MFD registrants. We support CIRO’s principles-based approach to education, which will allow advisors to tailor their education to best meet the needs of their individual practice. It is our view that empowering advisors to set their own educational agenda fosters greater engagement and a more meaningful approach to education. We note, however, that the MF license is a more restricted one, and as such may warrant a broad framework within which the MFD registrant can choose his/her own curriculum.

The cost associated with accreditation is becoming burdensome for not-for-profit providers, and so IFB appreciates the move to eliminate the need for formal accreditation. We acknowledge the comment made by an investor advocate that raises concerns about the quality of education and agree that this is of paramount concern.

To ensure that providers are meeting the standards set by CISO without imposing costly accreditation fees, IFB respectfully suggests that CISO consider a regime where the providers are accredited and are subject to periodic audit to ensure these standards are met. This method has been successfully employed by Alberta and BC insurance regulators.

In closing, we appreciate the careful consideration that CISO has given to this matter, and the thoughtful approach to change. Should you wish to discuss this further, please reach out to the undersigned.

Sincerely,

*Nancy Allan*

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Independent Financial Brokers of Canada  
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