



**DELIVERY:** [via FSRA submission system](#)

June 2, 2023

Financial Services Regulatory Authority  
25 Sheppard Avenue West, Suite #100  
Toronto, Ontario  
M2N 6S6

Dear Sir/Madam:

## RE: FSRA'S PROPOSED FEE RULE – 2<sup>ND</sup> CONSULTATION

Thank you for your request for comment letters regarding this important consumer protection initiative regarding the use of the titles ‘Financial Planner’ and ‘Financial Advisor’ in Ontario and specifically, on the proposed amendment to the *Assessments and Fee Rule* (FSRA Fee Rule).

The Canadian Institute of Financial Planning (CIFP) is pleased to represent the views of its more than 7,000 students. Further, our submission also incorporates the comments of our affiliate member organization, The Canadian Institute of Financial Planners (CIFPs), which represents over 10,000 members.

Thank you for taking our comments into consideration. Please contact **Keith Costello, President and Chief Executive Officer** of CIFP at (647) 723-6447 or [kcostello@cifps.ca](mailto:kcostello@cifps.ca) if you have any questions or, if you would like to meet with us to discuss this matter further. We look forward to and welcome an opportunity to participate in further discussions or consultations that you decide to undertake.

Yours very truly,

Keith Costello, BADM, MBA-Strategic Planning  
President & Chief Executive Officer

The Canadian Institute of Financial Planning recognizes the significant costs inherent in implementing and overseeing a system such as the FP/FA title protection framework undertaken by FSRA. This said, cost is a sensitive issue—for individuals and entities alike.

CIFP considers itself fortunate that our credential holders appreciate the value they receive from our organization and this has led to an exceptionally high renewal rate even with the addition of a new regulatory fee this year (CIFP, presumably as with other CBs, passes on FSRA's variable annual assessment fee to individual credential holders). However, our experience does not diminish the fact credential holders in Ontario are not likely to warmly embrace the additional annual cost they must incur to operate their practise particularly, when the myriad other annual fees to which FPs and FAs are already subject to are taken into account.

With this in mind, it is worthwhile to revisit the original principles governing FSRA's fee structure and accordingly, CIFP would encourage FSRA to continue to keep fairness and consistency at the forefront. For CIFP, these principles mean ensuring all entities that derive a benefit from the title protection framework—without exception—pay their fair share of the costs and that costs are distributed equitably. Further, the principle of effectiveness and efficiency should also be adhered to to ensure 'FSRA will be an effective steward of resources and will...seek to minimize costs where practicable and where such minimization will not create material or unacceptable regulatory risk.'

While CIFP acknowledges the importance of including Canadian Investment Regulatory Organization (formerly New Self Regulatory Organization) as an approved credentialing body under the Financial Professionals Title Protection Framework, at the end of the day, all participants have a responsibility to make a proportional contribution to make the framework effective and viable and to enable FSRA to achieve its mandate over the long-term. To this end, CIFP believes FSRA must cast a wide net to share the necessary costs so as to ensure the system is fair. This assertion is not supportive of fee exemptions or reductions.

Moreover, spreading out costs as broadly as possible will effectively reduce the cost for each individual credentialing body. Lower costs for credentialing bodies will translate into lower costs for individual credential holders and this can serve to incentivize more individuals—or, at least not deter them—to pursue an approved credential. This is a clear benefit to the industry, consumers and investors as a whole.

CIFP would like to thank the Financial Services Regulatory Authority of Ontario for considering the comments and perspective contained in this submission. We extend an open invitation to your organization for further discussion of any aspect of this document or, the topic of regulating financial planners more generally at your discretion.