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Delivered by Email

August 26, 2019

Richard Korble
Vice President, Registrations – Acting
Investment Industry Regulatory Organization of Canada
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and to

Market Regulation
Ontario Securities Commission
Suite 1903, Box 55
20 Queen Street West
Toronto, ON
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marketregulation@osc.gov.on.ca

Dear Mr. Korble:

Subject: IIROC Notice 19-0117: Continuing Education Rules

Assante Capital Management Ltd. (“Assante”) appreciates the opportunity to comment on IIROC Notice 19-0117: Continuing Education Rules – proposed amendments (the “Amendments”).

Assante is a subsidiary of Assante Wealth Management Inc., one of the country's largest independent wealth management firms. Assante and our sister firm Assante Financial Management Ltd., a MFDA member firm, have over 835 professional advisors overseeing approximately \$47 billion of assets under administration on behalf of Canadian families and institutions.

Assante provide comprehensive and integrated wealth management services to clients and our advisors adhere to the highest standards of professionalism. As such, we generally support the Investment Industry Regulatory Organization of Canada’s (“IIROC’s”) efforts to modernize and remove inconsistencies in the continuing education rules as detailed in the Amendments.

We respectfully provide two comments with respect to Rule 2662 (1) of the Amendments, which is transcribed below.

2662. Penalties for late filing or not completing continuing education requirements in a continuing education program cycle

- (1) On the last business day of the first month of a continuing education program cycle, IIROC will automatically suspend the approval of the continuing education participant if:
- (i) a continuing education participant fails to complete the continuing education requirements within continuing education program cycle, or
 - (ii) the sponsoring Dealer Member fails to update the continuing education reporting system and notify IIROC as required by clause 2657(1)(vi).

First, there appears to be grammatical error in (1)(i) as the sentence is incomplete. We believe the intention of the rule is to suspend the participant if they fail to complete the continuing educational requirements in the program cycle. If this is correct, we agree with the intended change.

Second, with respect to (1)(ii), we do not support this amendment to the rule as we do not believe the advisor should be suspended for the Dealer Member's failure to update the continuing education reporting system in a timely manner. Instead, we believe the Dealer Member should be held to account, by way of a monetary fine, for their failure to report. By suspending the participant who has completed the CE requirements, IIROC is not only punishing the participant for something that is beyond their control but there may be negative consequences for the clients of the participant. For example, if the participant is not able to provide advice and execute transactions, the client may suffer significant financial loss. This unintended consequence is not in the best interest of clients.

Thank you for providing the opportunity to comment on the Amendments. Please contact me if there are any questions regarding these comments.

Yours sincerely,



Sean Etherington
President
Assante Wealth Management Inc.