

July 16, 2019

I am responding to the request for comments to the consultation paper
https://www.iiroc.ca/Documents/2019/c046f984-1c4d-4a14-ad18-a1ceb5ac88ea_en.pdf

I have been an investment education advocate for close to 20 years, starting when I was a Wealth Advisor with one of the big five bank-owned brokerage firms in Canada and now that I am retired too, since I have started an investor education platform intended to help Canadians become smarter, savvier investors by delivering unbiased, factual and relevant information to them through my website, www.localwealthprofessionals.com and other means.

As well, I have always been a strong supporter of continuing education for investment professionals – in fact for all other professionals too. I was always grateful to the firm I worked for, for their diligence in delivering excellent continuing education content; it definitely helped me continue to be an excellent investment advisor.

My sense currently is that all the suggested topics are very appropriate – techniques for recognizing diminishing mental faculties and describing tools advisors can use to identify potential elder abuse by impatient family members are important. These are delicate topics which require skill to manage successfully:

- I agree with IIROC about eliminating a provision that allows reps to use the Canadian Securities Course (CSC) and the Conduct and Practices Handbook Course (CPH) to satisfy their CE requirements. Refreshers are useful and important tools to “remind” people about important rules and procedures. That is part of what continuing education is all about.
- I agree with a late filing fee for dealers.
- I agree that Approved Persons cannot repeat the same CE course unless the course has been substantially updated. However I also suggest that the key courses be kept current, ie be updated periodically – and especially if they are on key ethics topics (such as fraud avoidance) they be mandatory in each CE period.
- I recommend that any course credits be reserved ONLY for meaningful improvement or update of skills I.e. no “fluffy” credits
- **I disagree with this statement:** “For consistency in treatment across all types of CE courses, we are removing clause 2657(1)(v), which requires Dealer-delivered programs include a method of evaluation, such as an examination, course work, or case study. However, consistent with Notice 18-0023, we expect Dealers to follow our best practice guidelines for Dealer-delivered programs and maintain records of program content and CE participant attendance.” **Testing is a critical part of continuing education. If people can’t pass the test with 80% or more they obviously do not know the material. If the testing is too onerous for them they need to seek another occupation.**
- To reinforce the previous comment, CE requirements should not be considered in the absence of a review of baseline proficiency requirements.
- It might be useful for IIROC to also engage in a thorough, public review of proficiency standards, rather than only engaging with stakeholders on revising CE requirements.

- Individuals should NOT be able to extend the validity of certain essential courses, exams and other requirements by being allowed to take courses that may be unrelated to their core competencies. (no fluff)
- New trainings need to be developed on a few more topics which are so important to forming competent, responsible, ethical advisors:
 1. Advisor fraud: trainings exemplifying misuse of client signatures and inappropriate use of discretion in transacting securities and mutual funds would be useful to underscore the seriousness of these type of offenses. Is it possible that if people had to do training in which these practices were discussed and the consequences were discussed too, that some people who do these kind of things might stop? Also, once such training was in place, discussing these activities and the negative consequences for the clients, there would be a golden opportunity to make the sanctions for bad actors much more severe: misuses client signatures is forgery and fraud and should be a career-ending strategy – and the training could explain that too.
 2. Training is required in the management of retirees sector: specifically training on how to manage de-accumulating accounts: eliminate DSC, minimize or avoid investment strategies that may be expensive or impossible to liquidate as needed, etc, with examples

I hope this is useful.

Respectfully submitted,

Tom Dusmet

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