



August 10, 2020

Paige Ward
General Counsel, Corporate Secretary and Vice-President, Policy
Mutual Fund Dealers Association of Canada
pward@mfd.ca

Anne Hamilton
Senior Legal Counsel
British Columbia Securities Commission
ahamilton@bcsc.bc.ca

Dear Ms. Ward:

Re: MFDA Proposed Amendments to Policy No. 9 - Continuing Education (CE)

Thank you for the opportunity to provide comments to the proposed rules to introduce continuing education requirements for MFDA Participants. It is a positive step and we applaud the initiative.

We have two comments specific to the proposed accreditation rules:

1. In addition to trade associations, Third party accreditation should be eligible to Course Providers.

More than just creating content, Course Providers play an integral role in helping MFDA Dealer Firms with industry proficiency requirements, including content hosting, delivery and record keeping for compliance purposes. Course providers can provide back-office integration in ways not offered by professional trade associations, providing a cost effective training solution for small and mid-size Firms. While some Members will undertake self-accreditation responsibilities, others may not have the capacity to do so in a way that provides “sufficient detail to evidence compliance with 9.3.”

Allowing Course Providers to accredit content means that Members can have a complete proficiency solution with just one Course Provider, which makes for an efficient and cost-effective implementation. Allowing only trade associations to be recognized as Third Party accreditation providers introduces an added layer of complexity and cost, at the expense of the Members and Approved Persons.

The proposed requirements for becoming a recognized Third Party accreditor also mean that only a very few existing associations could be eligible, and extremely difficult for new associations to become eligible, removing the forces that foster innovation and competitive pricing. We also see no evidence to suggest that trade associations apply any more academic rigor than Course Providers when it comes to evaluating continuing education content.

To be recognized as a Third Party content accreditor, Course Providers should be required to demonstrate that they operate in the best interest of the capital markets. But they should not be ruled out automatically.

2. IIROC should be required to apply for accreditation status.

IIROC does not accredit continuing education content; rather, it outsources that work to a Third Party. And while IIROC may be deserving of automatic recognition from The MFDA, the Third Party hired to accredit IIROC’s content may not. We see no added value to The MFDA and its Members to warrant the additional risk exposure of giving automatic accreditation status to an unscrupulous entity.



Third Parties outsourced by IIROC should be required to complete an application process like any trade association or Course Provider.

We thank the MFDA for allowing us to provide our comments and look forward to supporting its continuing education initiative.

Sincerely,

John Waldron, Founder
Learnedly Canada Inc.

learnedly.com

416.356.3474

john.waldron@learnedly.com