



Sept. 19, 2019

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**Re: MFDA Continuing Education (CE) Accreditation Process - Discussion Paper Bulletin #0788-P**

Sun Life Financial Investments Services (Canada) Inc. (SLFISI) fully supports MFDA's proposal to implement mandatory Continuing Education requirements for Approved Persons of Members to maintain a high standard of professionalism and industry knowledge. Our key comments to the questions in the Discussion Paper are summarized below.

**Accreditation Process**

We are supportive of the MFDA delegating accreditation reviews to approved third parties who meet the proposed criteria. The qualification criteria to be an accreditor and fees charged should be consistent with other securities regulators (e.g. IIROC, AMF).

**CE Process**

Overall, the workflow processes appear reasonable. Where Members develop their own internal CE tracking processes, such Members should have the capability to limit Approved Persons access to MFDA CERTS to read only. Such Members should not be required to submit the details. Instead, the Member must maintain the evidence and detailed records which are made available for any MFDA examinations.

Standards setting out when Members must update MFDA CERTS should be consistent with IIROC standards (e.g. provide flexibility to submit information throughout the CE Cycle with a reasonable deadline following the end of the CE Cycle). We suggest Members should be able to generate reporting and filter information by outstanding or completed CE credits by category for an advisor.

Thank you for the opportunity to provide our comments for your consideration. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Woodman".

Karen Woodman  
President, Sun Life Financial Investments Services (Canada) Inc.