
Department of Finance and Treasury Board
Office of the Superintendent of Insurance

Fair Registration Practices Act (FRPA)
Review Report
August 15, 2023

Province of Nova Scotia

EXECUTIVE SUMMARY

The Minister of Finance and Treasury Board is specifically named in the *Fair Registration Practices Act* (FRPA or “the Act”) as a “regulating body” that is subject to the Act. The Minister is responsible for the registration practices for the regulated occupations of Insurance agents/brokers/adjusters, which is administered by the *Office of the Superintendent of Insurance* (OSI) and is the subject of this FRPA review. Section 6 of the Act summarizes the “Duty” of each “regulating body” as follows:

Duty of regulating body

6 *A regulating body has a duty to carry out registration practices that are transparent, objective, impartial and procedurally fair.*

The Review Officer, appointed under Section 13 of the Act and under the authority provided for under Sections 14 and 16 of the Act, facilitated a FRPA Review, which was initiated on February 2, 2023, and resulted in this final report. The purpose of this FRPA Review at the outset was:

- 1) To determine the current compliance status with the FRPA; and
- 2) If areas of non-compliance are identified, to facilitate a path back to compliance through the requirement to develop an Action plan containing specific actions and completion dates as well as the requirement of progress reports on that Action plan until compliance is achieved.

The current compliance status was determined based on OSI’s responses to 10 review questions, as well as corroborating information on [OSI’s website](#). Upon review of this information, and following some consultation with OSI, additional information of existing/established OSI policies was posted to OSI’s website related to the following general topics:

- Registration Practices for international applicants and interprovincial applicants;
- The length of time that the registration process usually takes;
- Allowance for Alternative Information;
- Accommodation Practices for Applicants with a physical or mental disability;
- How Registration Decisions are communicated; and
- The Internal Review Process (appeal process for unsuccessful applicants).

With this additional information on OSI’s website, no compliance issues were identified. The review questions, OSI’s responses, and the assessment of those responses based on compliance criteria are detailed in this report.

As required under Subsections 16(8) of the Act, another review will be conducted on OSI's registration practices within 5 years of the date of this report.

The collaboration and cooperation of the *Office of the Superintendent of Insurance* throughout this review process is gratefully acknowledged.

Sincerely,



Frank Reinhardt
Review Officer, Fair Registration Practices Act (FRPA)

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1. INTRODUCTION

1.1. THE FAIR REGISTRATION PRACTICES ACT

The [Fair Registration Practices Act](#) (FRPA or “the Act”) applies to 47 [regulatory bodies](#) in Nova Scotia, covering 84 occupations, including 20 compulsory trades. A regulatory body (regulatory authority or regulator) sets the standards and regulates how people practice as members of an occupation or trade. Everyone who practices within a regulated occupation or trade must register with the regulatory body.

The FRPA mandates that regulating bodies carry out registration practices that are transparent, objective, impartial and procedurally fair. Section 16(2) of the FRPA states: “Every regulating body shall review its registration practices in accordance with this Section and shall file a report on the results of the review with the Review Officer for the reporting period.” This review process is to occur as per the Act and if items are deemed to be noncompliant with the FRPA, an Action Plan is required to be completed by the regulating body. The intent of the Action Plan is to identify how the items of noncompliance are progressing to ensure compliance, fairness, and transparency, as required by the Act.

1.2. OVERVIEW OF THE REGULATING BODY


Name of Regulating Body:	Office of the Superintendent of Insurance
Review Questions Due:	2023-06-02
Date Submitted:	2023-05-24

Occupational Profile

The Office of the Superintendent of Insurance regulates the business of insurance in the province and enforces the Insurance Act.

Organizational Description

The office issues licenses to all insurers operating in the province and all insurance agents/brokers, agencies, and adjusters.



The Office of the Superintendent's mandate is to promote and enhance consumer confidence and public trust in the insurance, credit union and trust and loan companies' sectors through the regulation of market conduct and financial monitoring and to inform and protect consumers pertaining to these sectors

Active Membership Requirements

Active Membership requirements are based on the status of the license. Agents/Agencies must keep their licenses up-to-date and seek renewal accordingly. Failure to renew causes the license to be null and void with the status deemed as terminated.

Registration Requirements

There are four types of registrations: Agents, Adjusters, Agencies and Insurance companies. All registrations require the submission of the respective application along with the supporting documents required based on the kind of license being applied for. The Requirement of Agents is successful completion of the requisite exam (s) based on the type of license being applied for. There are two type of agents (general agents and Life Insurance agents). Registration of Adjusters requires successful completion of IIC courses based on the level of license applied for. Agency Registration is subject to the submission of the CRA Business Number and Registry of Joint Stock Companies Number. Insurance companies must be licensed in order to operate in Nova Scotia. Most insurance companies are licensed federally, with a smaller number licensed directly by the Nova Scotia Government.

2. QUANTITATIVE DATA - 2022

Quantitative data is collected from regulating bodies each year by way of a data survey. The following is some of the information provided by the *Office of the Superintendent of Insurance* through the 2023 survey, covering the 2022 year, in fulfillment of the quantitative reporting requirements under Section 15 of the FRPA:

Total Registered Members*:	10,915
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* As of December 31, 2022

Applications							
	Received in 2022	Decisions Rendered in 2022 ¹				Success Rate ³	In Progress at end of 2022 ¹
		Total	Successful	Unsuccessful	Withdrawn ²		
New	536	536	536	0	0	100%	0
Interprovincial ⁴	1,808	1,808	1,808	0	0	100%	0
International ⁵	4	4	4	0	0	100%	5
Total	2,348	2,348	2,348	0	0	100%	5

1. Regardless of when the applications were received (not necessarily equal to the number received in 2022).

2. Includes those withdrawn, set as "inactive" or closed.

3. Success Rate is the # of successful decisions divided by the total # of decisions (excludes in-progress).

4. 68% were from Ontario; 10% from New Brunswick; 8% from Alberta. Less than 5% were from each of the remaining Canadian Jurisdictions.

5. All 4 international applicants received in 2022 were from the U.S.A..

Internal Reviews Conducted in 2022*:	0
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* "Internal Reviews" are reviews of registration decisions conducted by the Regulating Body at the request of unsuccessful applicants (appeals).

Average Application Processing Time*:	10 Days
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* From the time an application is "complete" to the time a registration decision is communicated to the applicant.

* The same average processing times are reported for each of the three applicant types (New, Interprovincial and International).

3. FRPA REVIEW QUESTIONS, RESPONSES AND COMPLIANCE ASSESSMENTS

As per Section 16 of the Act, the registration practices of a regulating body must be reviewed, and a public report produced. The FRPA Program works with regulatory bodies to assess the registration practices against the compliance criteria. The *Office of the Superintendent of Insurance* responses to the FRPA Review questions are detailed below, along with the review findings determined by the Review Officer in accordance with the Act.

3.1: INFORMATION AND REGISTRATION PROCEDURES

This section assesses how and what information is provided to applicants during the registration process. The registration process includes the actions required to be taken by individual applicants, and any documentation required to be submitted, which will be used to assess an application for registration.

QUESTION 1 - REGISTRATION PROCESS, REQUIREMENTS AND COMMUNICATIONS

The following question is broken into three parts (A, B and C), one for each of the three application types, as follows:

A: “New Applicants”

- Those who are only including Canadian credentials in their application to apply for registration (licensure) and are not currently registered (licenced) to practice anywhere in Canada.

B: “International Applicants”

- Those who are including international credentials in their application to apply for registration (licensure) and are not currently registered (licenced) to practice anywhere in Canada.

C: “Interprovincial Applicants”

- Those who are currently registered (licenced) to practice elsewhere in Canada (outside of Nova Scotia).

The response to Part A should be fully detailed, while the responses to Parts B and C only detail any differences from Part A.

QUESTION 1A (REGISTRATION OF “NEW APPLICANTS”)

Using the table below, explain, in detail, the registration process and requirements for “New Applicants” (see definition above) and how this information, including “*the length of time that the registration process ...usually takes;*”, is communicated to these applicants and those who only “*intend to apply*” (e.g., by making the information publicly available). Please answer separately for each license/registration type (eg. full, partial, restricted, student etc.).

Note: Subsections A through F below are identical and are only provided to allow for the possibility that multiple license/registration types are issued. If there is only one license type, use only Subsection ‘A’. For efficiency, after fully reporting on the first licence type in Subsection ‘A’, for any subsequent licence types, it is acceptable to report on only the differences. (e.g., for the qualifications of the licence type reported in Subsection ‘B’, it would be acceptable to report “*Same as Subsection ‘A’ except...*”.

RESPONDENT ANSWER	A. LICENSE TYPE	General Insurance Agent
	QUALIFICATIONS (LIST ALL)	Complete a course through CIP Program (offered by Insurance Institute) or CAIB Program (offered by Canadian Association of Insurance Brokers, Take Fundamentals of Insurance Course offered by Canadian Association of Insurance Brokers.
	DOCUMENTATION (LIST ALL)	Application Form, Fee, Criminal Record Check (For NS Residents only) A criminal record check report must accompany all individual license applications for applicants who are residents of Nova Scotia. A copy of the criminal check can be obtained from the following: <ol style="list-style-type: none"> 1. MyBackCheck 2. Municipal Police Department 3. RCMP Detachment
	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	<ol style="list-style-type: none"> 1. Download the Individual Insurance Licence Application from the Insurance Forms page. 2. Complete the application form and have it endorsed by an insurance company that is licensed to operate in Nova Scotia. 3. If you are a non-resident agent, you must provide the Certificate of Authority issued from the jurisdiction where you reside. 4. Return the completed application form to the address on the form with the licensing fee.
	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	Communication is via Email, Phone & Fax. Insurance agent licenses are issued for a period of three years. All agents (except Travel, Accident, and Baggage) must meet specific requirements (completion of exams and/or courses; and/or experience) before being licensed.
	B. LICENSE TYPE	<ul style="list-style-type: none"> • Life Agent (including Accident and Sickness)

QUALIFICATIONS (LIST ALL)	<ul style="list-style-type: none"> • Life Licensing Qualification Program (LLQP)) • Pass the provincial licensing exam: See Exam Registration information
DOCUMENTATION (LIST ALL)	<p>Application Form, Fee, Criminal Record Check (For NS Residents only) A criminal record check report must accompany all individual license applications for applicants who are residents of Nova Scotia. A copy of the criminal check can be obtained from the following:</p> <ol style="list-style-type: none"> 1. MyBackCheck 2. Municipal Police Department 3. RCMP Detachment
REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	<ol style="list-style-type: none"> 1. Download the Individual Insurance Licence Application from the Insurance Forms page. 2. Complete the application form and have it endorsed by an insurance company that is licensed to operate in Nova Scotia. 3. If you are a non-resident agent, you must provide the Certificate of Authority issued from the jurisdiction where you reside. 4. Return the completed application form to the address on the form with the licensing fee.
COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	<p>List of LLQP Course Providers (https://novascotia.ca/finance/site-finance/media/finance/Course%20Provider%20Listing.pdf) Communication is via Email, Phone & Fax. Insurance agent licenses are issued for a period of three years. All agents (except Travel, Accident, and Baggage) must meet specific requirements (completion of exams and/or courses; and/or experience) before being licensed</p>
C. LICENSE TYPE	Accident and Sickness only
QUALIFICATIONS (LIST ALL)	<ul style="list-style-type: none"> • Life Licensing Qualification Program (LLQP)) • Pass the provincial licensing exam: See Exam Registration information
DOCUMENTATION (LIST ALL)	<p>Application Form, Fee, Criminal Record Check (For NS Residents only) A criminal record check report must accompany all individual license applications for applicants who are residents of Nova Scotia. A copy of the criminal check can be obtained from the following:</p> <ol style="list-style-type: none"> 1. MyBackCheck 2. Municipal Police Department 3. RCMP Detachment
REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	<ol style="list-style-type: none"> 1. Download the Individual Insurance Licence Application from the Insurance Forms page. 2. Complete the application form and have it endorsed by an insurance company that is licensed to operate in Nova Scotia.

		<p>3. If you are a non-resident agent, you must provide the Certificate of Authority issued from the jurisdiction where you reside.</p> <p>4. Return the completed application form to the address on the form with the licensing fee.</p>
	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	List of LLQP Course Providers (https://novascotia.ca/finance/site-finance/media/finance/Course%20Provider%20Listing.pdf) Communication is via Email, Phone & Fax . Insurance agent licenses are issued for a period of three years. All agents (except Travel, Accident, and Baggage) must meet specific requirements (completion of exams and/or courses; and/or experience) before being licensed.
	D. LICENSE TYPE	Travel, Accident and Baggage
	QUALIFICATIONS (LIST ALL)	Travel Insurance Agents must follow application procedures. <u>There is no pre-licensing requirement for Travel Agents.</u>
	DOCUMENTATION (LIST ALL)	<p>Application Form, Fee, Criminal Record Check (For NS Residents only)</p> <p>A criminal record check report must accompany all individual license applications for applicants who are residents of Nova Scotia. A copy of the criminal check can be obtained from the following:</p> <ol style="list-style-type: none"> 1. MyBackCheck 2. Municipal Police Department 3. RCMP Detachment
	REGISTRATION PROCESS AND HOW REQUIREMENTS ARE MET BY APPLICANT (STEP-BY-STEP)	<ol style="list-style-type: none"> 1. Download the Individual Insurance Licence Application from the Insurance Forms page. 2. Complete the application form and have it endorsed by an insurance company that is licensed to operate in Nova Scotia. 3. If you are a non-resident agent, you must provide the Certificate of Authority issued from the jurisdiction where you reside. 4. Return the completed application form to the address on the form with the licensing fee.
	COMMUNICATION OF INFORMATION (DESCRIBE & ADD ANY RELEVANT LINKS)	

QUESTION 1B (REGISTRATION OF INTERNATIONAL APPLICANTS)

Does the registration process and requirements for “international applicants” (see definition above) differ from that of “New Applicants” (as described above under Question 1A)?

If so, please describe these differences, including any allowances, exemptions and/or accommodations available to these applicants and how these differences are communicated to them.

**RESPONDENT
ANSWER**

- Yes
- No

If yes, describe the differences (include any relevant web links, if any):

International Application Guidelines and FAQ

All applicants not currently licensed, including those who are currently living outside of Canada, who wish to be licensed to sell Life, Accident and Sickness or General insurance must follow the process outlined below:

Those applicants who reside outside of Canada and currently hold a valid license in their jurisdiction may be eligible to challenge the Nova Scotia Life Licensing Qualification Program (LLQP) and General Exams. To begin this process, the applicant must submit the following documentation for review by the OSI:

Documentation Required:

- A resume outlining relevant work experience including references
- A certificate of authority issued by the jurisdiction where the applicant holds a valid license in good standing for the same class of insurance they will be applying to be licensed for
- Certified copies of any original academic documentation that was necessary to obtain licensing to sell insurance in the jurisdiction which the person resides for the same class of insurance they will be applying to be licensed for
- Completion of the LLQP / General course from an online course provider
- Confirmation that the applicant has the sponsorship of a licensed [insurance agency](#) operating in Nova Scotia
- A current criminal record check from the jurisdiction where they reside
- All original documents not in English require a certified translation. [Translation Services Canada](#) is one organization in particular which offers this service.

QUESTION 1C (REGISTRATION OF INTERPROVINCIAL APPLICANTS)

Does the registration process and requirements for “interprovincial applicants” (see definition above) differ from that of “New Applicants” (as described above under Question 1A)?

For example, are the process and requirements somehow “streamlined” to comply with the [Canadian Free Trade Agreement](#) (Chapter Seven - Labour Mobility, pages 83-88), as required under Nova Scotia’s [Canadian Free Trade Agreement Implementation Act](#)?

If so, please describe these differences, including any allowances, exemptions and/or accommodations available to these applicants and how these differences are communicated to them.

RESPONDENT ANSWER

- Yes
- No

If yes, describe the differences (include any relevant web links, if any):

Any individual who is licensed in any other Canadian province/territory will get licensed on an equivalent basis. Below is the comparison table for LLQP interprovincial transfers.

Province/Territory	Equivalent Life License	Equivalent A&S License	Continuing Education required	Sponsorship required in NS
British Columbia	Yes	yes	No	Yes (sponsorship not required if going to BC)
Alberta	Yes (AB issues 2 separate licenses)	Yes	No	Yes
Saskatchewan	Yes	Yes	No	Yes
Manitoba	Yes	Yes	No	Yes
Quebec	Yes (12 weeks probation if going to QC)	Yes (6 Weeks of probation if going to QC)	No (QC requires legal and taxation modules to be passed)	Yes
New Brunswick	Yes	Yes	No	Yes
Ontario	Yes (2 years of sponsorship required if going to ON)	Yes	No	Yes
PEI	Yes	Yes	No	Yes
Newfoundland	Yes	Yes	No	Yes
Yukon	Yes (no sponsorship required if going to Yukon.	Yes	No	Yes
Northwest	Yes	Yes	No	Yes

General:

The licensing process for general insurance agents from other provinces/territories in Nova Scotia is individually assessed, taking into account the applicant's completed courses and obtained license level in their home province. For example, if an applicant holds a level one license in their province, they will be granted an equivalent license in Nova Scotia. In situations where the applicant's home province does not issue license levels, they will be granted a level one license in Nova Scotia. However, if they

	desire to obtain a higher level license, they must provide transcripts demonstrating the successful completion of relevant courses for that specific level. Currently, Nova Scotia has three levels available for the general insurance category: Level I, II, and III.
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QUESTION 1 (Parts A, B AND C) REVIEW FINDINGS (To be completed by the FRPA Review Officer):

REVIEW FINDINGS	Compliance Criteria (pursuant to Sections 3, 7(a)(b)(c) and (e), 9(a), 16(3)(a), (b) and (g) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
(To be completed by the FRPA Review Officer)	<ul style="list-style-type: none"> provides information about its registration practices in a clear and understandable form, including descriptions of any differences for applicants with international qualifications and for those who are licenced in other Canadian jurisdictions; 	YES
	<ul style="list-style-type: none"> Provides “information [to applicants and potential applicants] about the length of time that the registration process ...usually takes”; 	YES
	<ul style="list-style-type: none"> explains the qualifications required for registration; 	YES
	<ul style="list-style-type: none"> identifies documentation of qualifications that must accompany an application; 	YES
	<ul style="list-style-type: none"> explains the registration process and how requirements for registration are to be met; 	YES
	<ul style="list-style-type: none"> explains how information is communicated; and 	YES
	<ul style="list-style-type: none"> provides information in a publicly accessible manner. 	YES

Comments, to be completed by the FRPA Review Officer:
 Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on [OSI’s website](#) on August 4, 2023.

QUESTION 2 (REGISTRATION PROCESS FEES)

Do you charge a fee for the registration process? If so, describe the fee and explain how this information is communicated to applicants. Include a link to information published in the public domain. If there is a third-party process with associated fees, please explain. Provide a link to any published information.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: The fee is mentioned in the form itself. Licensing Fees - Agent, Agency, Adjuster & Corporate Adjuster Licensing Item Fee Initial application and renewal (3 yr) - all agents, agencies, and adjuster Levels I-V \$398.10
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	Change of sponsor \$66.35	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(f) and 16(3)(d) of the FRPA):	Compliant?
	Requirement that the regulating body:	(YES/NO)
	<ul style="list-style-type: none"> provides information setting out any fees for registration in a clear and understandable form; provides information about fees in a publicly accessible manner. 	YES YES
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on July 4, 2023.		

QUESTION 3 (ALLOWANCE FOR ALTERNATIVE DOCUMENTATION)	
Are there any situations, where the standard required documentation cannot be reasonably obtained by an applicant, that alternative documentation may be acceptable to the regulating body? (Yes/No)	
If yes, please detail what alternative documentation may be accepted in what situations and in place of what standard documentation. How is this information communicated to applicants? If available, please provide a link to where this information is published in the public domain.	
RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please explain: The Nova Scotia Office of the Superintendent of Insurance (OSI) recognizes that there are circumstances where an applicant will not be able to provide certain required documents for reasons beyond the applicant's control. In these circumstances, the OSI will work with the applicant to accept alternative information to the required documentation, in a way that will not compromise the integrity of the licensing process. Once the new website is operational, the alternate document policy of the Superintendent's office will be made available on the division website. Requesting Consideration of Alternative Information <ul style="list-style-type: none"> <input type="checkbox"/> An applicant who cannot provide some or all of the required documentation should contact the OSI in writing to request that the OSI accept alternative information. The applicant's request should include: <ul style="list-style-type: none"> <input type="checkbox"/> a list of the required documents that cannot be provided,

	<ul style="list-style-type: none"> <input type="checkbox"/> the reason the applicant cannot obtain the required documentation, <input type="checkbox"/> a description of what attempts the applicant has previously made to obtain the required documentation, <input type="checkbox"/> a description of the documents the applicant could provide to demonstrate their qualifications for licensure, and <input type="checkbox"/> whether or not the applicant consents to the OSI contacting third parties to assist in obtaining information and documentation of the applicant’s qualifications. <ul style="list-style-type: none"> <input type="checkbox"/> The OSI may request that the applicant provide additional information or evidence to demonstrate why the applicant is unable to provide required documentation. <input type="checkbox"/> Where the required documentation is required by a third party assessor, the OSI may direct the applicant to contact the third-party directly. <p>Acceptable Alternate Information – Educational Credentials Where the OSI accepts that required documentation cannot be provided for reasons beyond the applicant’s control, the OSI will consider the following alternative information for assessing an applicant’s educational credentials:</p> <ul style="list-style-type: none"> <input type="checkbox"/> certified copies of original academic documentation; <input type="checkbox"/> photocopies of academic documentation together with an affidavit attesting to the authenticity of the document; <input type="checkbox"/> an affidavit from the applicant describing the applicant’s academic qualifications, the institution attended, and detailed descriptions of the courses taken and course curriculums, with supporting evidence if available; <input type="checkbox"/> affidavits from former professors and classmates verifying the applicant’s course descriptions and attesting to the applicant’s academic performance; <input type="checkbox"/> information obtained by the OSI from third parties, with the applicant’s advance consent, verifying the applicant’s educational credentials; <input type="checkbox"/> any other information offered by the applicant evidencing their academic qualifications. <p>Acceptable Alternate Information – Professional Qualifications Where the Registrar accepts that required documentation cannot be provided for reasons beyond the applicant’s control, the OSI will consider the following alternative documents for assessing an applicant’s prior experience:</p> <ul style="list-style-type: none"> <input type="checkbox"/> reference letters from prior employers and colleagues; <input type="checkbox"/> an affidavit from the applicant describing the applicant’s professional qualifications and detailed descriptions of prior work performed, with supporting evidence if available; <input type="checkbox"/> copies of reports that support the applicant’s involvement in a project; <input type="checkbox"/> statements of professional standing from other regulatory bodies; <input type="checkbox"/> certified copies of professional licenses or certificates; <input type="checkbox"/> any other information offered by the applicant evidencing their professional qualifications. <p>The applicant is responsible for the costs of alternative assessments. All original documents that are not in English require a certified translation.</p>	
REVIEW FINDINGS	<p>Compliance Criteria (pursuant to Sections 7, 9 and 16(3)(c) of the FRPA): Requirement that the regulating body:</p> <ul style="list-style-type: none"> • provides clear and understandable information with respect to acceptable alternative documentation; and 	<p>Compliant? (YES/NO/ N/A) YES</p>

(To be completed by the FRPA Review Officer)	<ul style="list-style-type: none"> advises applicants, and potential applicants, on what alternative information may be supplied when they cannot reasonably obtain the standard documentation; 	YES
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on August 4, 2023.		

QUESTION 4 (SUPPORT PROVIDED TO APPLICANTS DURING THE REGISTRATION PROCESS)		
Do you provide any support to applicants during the registration process? If so, describe the type of support provided. (Examples: contact information, explanation of registration requirements, translation services, etc.). How is information about supports communicated to applicants? Provide a link(s) to information published in the public domain.		
RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: All queries (registration related and other services) are answered either by phone or email. Phone: 902 424 6331 Email: ins.licensing@novascotia.ca Other Contact details are given on https://novascotia.ca/finance/en/home/insurance/default.aspx.html	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(e) and 16(3)(k) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	<ul style="list-style-type: none"> provides support to the applicant during the registration process; 	YES
	<ul style="list-style-type: none"> describes the type of support provided to the applicant during the registration process; and 	YES
	<ul style="list-style-type: none"> provides information about the type of support provided to applicants during the registration process in a publicly accessible manner. 	YES
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on July 4, 2023.		

QUESTION 5 (ACCOMMODATION POLICIES FOR APPLICANTS WITH A PHYSICAL OR MENTAL DISABILITY)	
Do you have existing accommodation policies for applicants with a physical or mental disability? (Yes/No)	
If yes, describe these existing policies, including: - how an applicant would request an accommodation;	

- how requests are considered; and
 - how these policies are communicated to “...individuals ...applying or intending to apply for registration...” as required under Section 7(e). If this is done by posting to the website, please include the link.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Procedures for requesting accommodations are as follows: 1. Individuals must identify themselves to the Office of the Superintendent of Insurance and, where required, provide appropriate documentation of their disability or disabilities. 2. The request for accommodation must be made no later than at the time of registration. Individuals with well described disabilities, and for which the type of accommodation sought is straightforward; this should be sufficient lead time to provide the requested accommodation. 3. By their very nature, accommodations are often individualized. In response to a request for accommodation, and considering all available resources, the Superintendent’s office will develop a specific accommodation that it deems reasonable and effective. 4. The Superintendent’s office reserve the right to select the specific adaptive equipment and support services it provides, deemed reasonable and effective. 5. Once the new website is operational, the accommodation policy of the Superintendent's office will be made available on the division’s website.
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REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(e), and 16(3)(h) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	<ul style="list-style-type: none"> describes existing accommodation policies, if any, for applicants with a physical or mental disability, including <ul style="list-style-type: none"> - how an applicant would request an accommodation; and - how requests are considered. 	YES
	<ul style="list-style-type: none"> provides information about its accommodations policies, if any, to “...individuals ...applying or intending to apply for registration...” (eg. by posting to its website). 	YES

Comments, to be completed by the FRPA Review Officer:
 Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on [OSI’s website](#) on August 4, 2023.

QUESTION 6 (ACCESS TO REGISTRATION RECORDS)

Do you have a documented process by which an applicant can request access to their registration records? If so, describe how an applicant can make this request, any exclusions to information that can be provided, and any fees that may apply. Include a link(s) to any published information, if available.

RESPONDENT ANSWER	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: <ul style="list-style-type: none"> - Individuals can make a request to get access their registration records - If the licensing fee is paid by a company on behalf of an individual, any credit card information or banking information of the company will not be disclosed - There is currently no fee to access any individuals registration record - All requests are to be officially made by email to ins.licensing@novascotia.ca - Once the new website is operational, the access to registration records process will be made available on the division’s website.
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REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 12(1) through (5) and 16(3)(j) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	• has an established process by which an applicant can make a request in writing for access to their registration records; and	YES
	• describes how an applicant can make a request, any exclusions to information that can be provided, and any fees that may apply.	YES

Comments, to be completed by the FRPA Review Officer:
 Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on [OSI’s website](#) on July 5, 2023.

3.2: ASSESSMENT CRITERIA AND COMMUNICATION OF DECISION PROCESSES

This section assesses how the regulating body evaluates applications and how this process, including registration decisions, are communicated to applicants.

QUESTION 7 (ASSESSMENT CRITERIA)

Explain, in detail, the criteria used by the regulating body to assess if an applicant has met requirements to be registered/licensed. (Examples: competencies, pass marks, experience standards, etc.) Also, explain how this information is communicated to applicants. Provide a link(s) to information published in the public domain.

If there is a third-party assessor involved in the process, describe their role in the space provided.

RESPONDENT ANSWER

Explain the criteria used for assessment and how the information is communicated:

When assessing a new insurance agent applying for a Nova Scotia license, specific criteria are used to evaluate their qualifications and suitability for the role. These criteria are designed to ensure that the agent possesses the necessary knowledge, skills, and ethical standards required to operate in the insurance industry. The assessment process typically involves the following criteria:

Education and Training: The applicant's educational background and any relevant insurance-related certifications or qualifications are considered. Completion of mandatory pre-licensing courses and ongoing professional development programs may be required.

Licensing Examination: The applicant is required to pass a licensing examination that tests their knowledge of insurance principles, products, laws, and regulations specific to Nova Scotia. This examination ensures that the agent has a solid understanding of the industry and its practices.

Criminal Background Check: As part of the assessment, a criminal background check is conducted to ensure the applicant's integrity and trustworthiness. Any past criminal convictions or fraudulent activities may disqualify the applicant from obtaining a license.

Experience: While prior experience may not be mandatory for a new insurance agent, any relevant industry experience or transferable skills are taken into consideration. This includes work experience in sales, customer service, or other related fields.

Ethics and Professionalism: The responsibility of the applicant's adherence to ethical standards and professional conduct is assessed by the sponsor insurer/agency the licensee will work in. This includes evaluating their understanding of the industry codes of conduct, as well as their commitment to treating clients fairly and honestly.

Communication and Interpersonal Skills: The ability to explain complex insurance products, listen to clients' needs, and provide appropriate advice is assessed by the sponsor agency/insurer during their new agent training to ensure the agent can effectively interact with customers.

The information regarding the assessment criteria and requirements for obtaining a Nova Scotia insurance license is typically communicated through various channels, including:

	<p>Nova Scotia Insurance Regulator Website: The division usually provides detailed information on their website about the criteria, application process, and required documentation. Once the new website is launched, the details about the assessment will be published on the divisional website.</p> <p>Application Forms and Guidelines: The application forms and guidelines provided by the licensing authority outline the specific criteria and documentation required to apply for an insurance license.</p> <p>Written and Phone Correspondence: The licensing authority communicates with applicants through written correspondence, such as letters or emails or by phone call. This correspondence may provide updates on the application status, additional documentation required, or any deficiencies identified during the assessment process.</p> <p>Is a third party involved in the assessment process?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, name the third-party(s) and describe their role: Durham College which administers the LLQP exam gives information on the pass mark and any rewrite attempts. IBANS also gives the information regarding the general exam pass work and rewrite rules for applications writing the general insurance exam.</p>	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(d), 16(3)(b) and (i) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	<ul style="list-style-type: none"> • describes all criteria used to assess whether the requirements for registration have been met; 	YES
	<ul style="list-style-type: none"> • explains how information is communicated; 	YES
	<ul style="list-style-type: none"> • provides information in a publicly accessible manner; and 	YES
<ul style="list-style-type: none"> • describes the role of third-party assessors (if applicable). 		YES
<p>Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on July 5, 2023.</p>		

QUESTION 8 (COMMUNICATING REGISTRATION DECISIONS)

Explain how you communicate registration decisions to applicants who are: a) successful; and b) not granted registration. Include what information is provided with each type of decision.

RESPONDENT ANSWER	<p>Explain the registration decision communication process:</p> <p>a) Successful applicants: When an applicant is granted registration, the regulator typically communicates this decision through an official notification. The communication may include the following information:</p> <p>Approval Notification: The applicant receives a formal license certificate by mail/email when they successfully qualify for a license. This notification serves as confirmation that they have met all the necessary requirements and are now eligible to practice as an insurance agent in Nova Scotia. This certificate also serves as official documentation of their registration and may include details such as their name, registration number, and the date of registration and period of registration(3 years in the normal term).</p> <p>Renewal Information: If applicable, the communication may also provide information about the registration renewal process, including timelines, fees, and any additional requirements.</p> <p>b) Applicants not granted registration: In cases where an applicant is not granted registration, the decision is communicated to the said party by phone or email. The communication may include the following information:</p> <p>Denial Notification: The applicant receives an official notification stating that their application for registration has been denied. The notification will clearly state that the applicant has not met the necessary criteria for registration.</p> <p>Reason(s) for Denial: The communication will provide specific reasons for the denial of registration. These reasons may include insufficient qualifications, failure to meet educational or training requirements, or issues identified during the assessment process.</p> <p>Guidance and Support: In some cases, the division may provide guidance or resources to help the applicant address the identified deficiencies and reapply in the future. This may include information on additional training programs, educational opportunities, or specific areas for improvement.</p>	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	<p>Compliance Criteria (pursuant to Sections 8(b), (c), (d), 10(1) of the FRPA): Requirement that the regulating body:</p> <ul style="list-style-type: none"> • where registration is granted, provides written confirmation within a reasonable time to applicants; • where registration is not granted: <ul style="list-style-type: none"> ○ provides written decisions that include reasons to applicants within a reasonable time respecting registration decisions; ○ provides, where practical, information respecting measures or programs that may be available to assist unsuccessful applicants in obtaining registration at a later date; and ○ informs the applicant of the internal review process and of the procedures and time frames for the internal review. 	<p>Compliant? (YES/NO)</p> <p>YES</p> <p>YES</p> <p>YES</p> <p>YES</p>
<p>Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on August 4, 2023.</p>		

3.3: INTERNAL REVIEW/APEAL PROCESS

Section 10 of the Act requires that regulating bodies provide unsuccessful applicants with a clear process to appeal a registration decision. Section 11 requires that those involved with reviewing registration decisions receive training on conducting such reviews. This section assesses compliance with these requirements.

QUESTION 9 (INTERNAL REVIEW PROCESS)

Do you have a documented internal review process for applicants who disagree with the registration decision?

If yes, describe the process including:

- time frames throughout the process; and
- opportunities available to the applicant to provide new information and make submissions with respect to their internal review; and
- how internal review decisions are communicated to applicants and what information is included with the decision; and
- a statement that no one who acted as a decision-maker in respect of a registration decision can act as a decision-maker in an internal review of that decision; and
- if available, provide a link to this information published in the public domain.

Internal review: a rehearing, reconsideration, review or appeal or other process provided by a regulating body in respect of the merits of a registration decision, regardless of the terminology used to describe the process.

RESPONDENT ANSWER

- Yes
 No

If yes, explain:

The OSI maintains an Internal Review Policy which outlines the process for applicants who disagree with a licensing decision by the Superintendent. The process provides applicants with an opportunity to have their case reviewed by a committee established pursuant to the OSI's Internal Review Policy.

Once the new website is operational, the internal review policy for the Superintendent's office will be made available on the division's website.

The following provides an overview of the internal review process:

1. Internal Review Process Overview:

- The applicant submits a request for an internal review of the registration decision, stating their reasons for disagreement.
- A committee is established pursuant to the Internal Review Policy and training is provided if necessary.
- The committee conducts a thorough examination of the applicant's case, considering all relevant information and submissions.
- A decision is made based on the merits of the case and communicated to the applicant.

	<p>2. Time Frames throughout the Process:</p> <ul style="list-style-type: none"> • These time frames may vary but a decision is expected to be provided between 30 to 90 days from the receipt of the request for internal review. <p>3. Opportunities for New Information and Submissions:</p> <ul style="list-style-type: none"> • During the internal review process, applicants are given opportunities to provide new information, additional documentation, or make written submissions that support their case. • The division may specify a deadline by which the applicant must submit any new information or submissions. <p>4. Communication of Internal Review Decisions:</p> <ul style="list-style-type: none"> • The committee communicates its decision to the applicant in writing within 14 days of the hearing. • The communication includes a clear explanation of the decision reached, taking into account the applicant's arguments and any new information or submissions provided. • If the committee decision overturns the initial decision, the applicant may receive a revised registration approval along with any associated documentation within 7 days of receiving the decision. • If the internal review upholds the initial decision, the applicant is informed of the confirmation of the original decision and the reasons for its affirmation. <p>5. Independence of Decision-Makers:</p> <ul style="list-style-type: none"> • To ensure fairness and impartiality, individuals who acted as decision-makers in the initial registration decision are not involved in the internal review process. <p>If no, explain why not:</p>	
REVIEW FINDINGS (To be completed by the FRPA Review Officer)	Compliance Criteria (pursuant to Sections 7(a) and 10, 16(3)(m) and (n) of the FRPA): Requirement that the regulating body:	Compliant? (YES/NO)
	<ul style="list-style-type: none"> • has a documented internal review process; 	YES
	<ul style="list-style-type: none"> • describes time frames associated with the internal review process; 	YES
	<ul style="list-style-type: none"> • describes opportunities the applicant has to provide new information and make submissions with respect to their internal review; 	YES
	<ul style="list-style-type: none"> • describes how internal review decisions are communicated to applicants and what information is included with the decision; 	YES
	<ul style="list-style-type: none"> • ensures that no one who acted as a decision-maker in respect of a registration decision can act as a decision-maker in an internal review; and • provides information on the internal review process in a publicly accessible manner. 	YES
Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on August 4, 2023.		

QUESTION 10 (INTERNAL REVIEW TRAINING)

Have the decision-makers for the internal review received training on conducting an internal review? If so, describe the training.

<p>RESPONDENT ANSWER</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, please describe: Per policy, Internal Review Committee members are required to take, and will be provided with, training prior to participating in an internal review hearing.</p> <p>The objectives of the training will include:</p> <ol style="list-style-type: none"> a. Familiarizing decision-makers with the internal review process, its purpose, and its importance in ensuring procedural fairness. b. Providing an overview of the relevant legislation (<i>Insurance act and regulations</i>), guidelines, and policies governing the internal review process. c. Explaining the principles of natural justice, procedural fairness, and legal considerations that decision-makers must uphold during the review. d. Developing decision-making skills, including assessing evidence, considering submissions, and reaching well-reasoned conclusions based on the merits of each case. e. Promoting consistency and uniformity in decision-making by ensuring the decision-makers have a shared understanding of the criteria, standards, and other requirements relevant to the registration decisions under review. 	
<p>REVIEW FINDINGS (To be completed by the FRPA Review Officer)</p>	<p>Compliance Criteria (pursuant to Sections 11 and 16(3)(p) of the FRPA): Requirement that the regulating body:</p>	<p>Compliant? (YES/NO)</p>
	<ul style="list-style-type: none"> • ensures that internal review decision-makers have received training on conducting an internal review; and 	<p>YES</p>
	<ul style="list-style-type: none"> • describes the training. 	<p>YES</p>
<p>Comments, to be completed by the FRPA Review Officer: Compliance with all of the above noted compliance criteria and associated FRPA Sections (cited above), as they pertain to the above FRPA review questions, was determined from the information provided above and from information found on OSI's website on July 5, 2023.</p>		

4. ACKNOWLEDGEMENTS:

The *Office of the Superintendent of Insurance* hereby declares that the information contained in this report is a true and accurate representation of its current registration practices.

SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:

X 

Name (print): David McCarron

DATE: August 29, 2023