## Updated February 28, 2014



# CLIENT RELATIONSHIP MODEL (CRM) REPORTING (CRM2) TOOLKIT

## **Regulatory Documents**

- Final <u>CSA Notice of Amendments to National Instrument (NI) 31-103</u>: Registration Requirements, Exemptions and Ongoing Registrant Obligations and to Companion Policy 31-103CP Registration Requirements, Exemptions and Ongoing Registrant Obligations (Cost Disclosure, Performance Reporting and Client Statements) – March 28, 2012
- Final <u>CSA Unofficial Consolidation of NI 31-103 and its Companion Policy</u>: National Instrument 31-103: Registration Requirements, Exemptions and Ongoing Registrant Obligations – as of July 15, 2013
- Comment request <u>IIROC Draft CRM2 Rule</u>: Client Relationship Model Phase 2 Performance Reporting and Fee/Charge Disclosure Amendments to Dealer Member Rules 29, 200 and 3500 and to Dealer Member Form 1
  - <u>IIAC Response</u> (February 10, 2014): On section 29.9 [pre-trade disclosure of charges] and subparagraph 200.2(I)(v)(C) [trade confirmation disclosure of debt security compensation] (effective July 15, 2014); and technical changes (effective when the rule on these points is final)
  - Comments due **April 10, 2014**: On position, additional statements, compensation and performance reporting requirements
- 4. Final: CSA CRM 2 FAQs (February 27, 2014)
- 5. Underway: Discussion with IIROC of new standards that may need to be be developed
- 6. **Underway:** Interactions with fund industry (Investment Funds Institute of Canada, Portfolio Management Association of Canada, Federation of Mutual Fund Dealers, Exempt Market Dealers Association, Advocis) re obtaining information to meet requirements

## **IIAC Tools and Templates**

- 7. Plan on a Page: <u>Overview/Timing of IIROC CRM2 Rules Conforming with CSA CRM2 (NI 31-103)</u>
- 8. Quick NI 31-103 Fields, Frequency, Format, and Exclusions Cross-Reference
  - <u>Cross-Reference</u>
  - Relationship Disclosure
  - Pre-Trade Contents
  - <u>Confirmation Contents</u>
  - <u>Account Statement Contents</u>
  - Additional Statement Contents
  - Annual Charges and Compensation Report Contents
  - <u>Annual Performance Report Contents</u>

#### 9. Data Maps

- Compensation (prototype and data map)
- Performance (prototype and data map)

#### 10. Other Documents that May Be of Use

- <u>CRM2 Olympics</u> Investor Behaviour and CRM2 Panel) (February 27, 2014)
- "The Devil is in the Details" CRM2 Reporting Presentation (November 27, 2013)
- Industry Asset Classification Schema
- Industry Adjusted Cost Base (Book Cost) Matrix (to follow)

#### 11. In draft: CRM Issues List

**12.** In draft: Second IIAC Member CRM2 Implementation surveys (First survey on current state of systems and potential directions completed, reflected briefly in "CRM2 Olympics" and can be provided to members that completed the survey; further surveys on member readiness status, etc. to follow)

## Communications

#### 13. CRM Messaging: One-page explanation of CRM1 and challenges of CRM2

14. In discussion – Value for Compensation: Helping advisors articulate the value of advice

#### **Events**

- November 21: Broadridge Focus Group on Compensation and Performance Reporting
- November 26: "The Devil is in the Details" Broadridge-sponsored Presentation on CRM2
- November 27: Roundtable on Pre-Trade Confirmation and Fixed Income Reporting
- February 27/14: IIAC Compliance and Ops Symposium session
- March 5, 2014: BLG Roundtable on CSA CRM2 FAQs
- TBD: Industry roundtable on enhanced suitability risk feed
- TBD: Industry roundtable on market value standards

## **Committees You Can Join**

- **CRM2 Implementation Working Group (CRM2IWG):** hands-on project-management-oriented working group working to identify and solve CRM2 implementation problems; will review draft responses to regulators on CRM2-related comment requests or other needs identified for comment
- **CRM2 Communications Working Group (CRM2CWG):** developing standardized industry communications, for example, regarding use of performance benchmarks, client-name securities, etc.
- **CRM2 Mutual Fund Working Group (CRM2MFWG:** working with IFIC, FMFD, fund managers and others to identify and address issues relating to fund-related disclosures
- **CRM2 Reporting Prototypes Working Group** (CRMRPWG): hands-on working group reviewing reporting requirements in detail
- Market Value Working Group (MVWG): hands-on working group addressing valuation requirements

## **Other Resources**

Policy: <u>Michelle Alexander; Adrian Walrath</u> Member Support: <u>Barb Amsden, Adrian Walrath</u>