



FIA & CUIA Review
Policy & Legislation Division
Ministry of Finance
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FINANCIAL INSTITUTIONS ACT & CREDIT UNION INCORPORATION ACT REVIEW

Initial Public Consultation

The members of the Insurance Brokers Association of British Columbia are pleased to have the opportunity to contribute to the 10-year review of the *Financial Institutions Act*.

The Insurance Brokers Association of B.C. serves as the voice of the general insurance brokerage industry and promotes its members as the premier distributors of insurance products and services in British Columbia. IBABC is the primary provider of pre-licensing and continuing professional education for the general insurance brokers in B.C. IBABC represents the interests of the public and its member brokers to government and to industry stakeholders.

IBABC represents in excess of 840 property and casualty insurance brokerages that in turn employ more than 9,000 people in approximately 140 B.C. communities. Member offices are the consumer's choice for the vast majority of all property and casualty insurance policies and premiums written in the province. More than four million British Columbians meet in person with their insurance broker every year to insure their homes, vehicles, businesses and farms.

Consumer satisfaction with their insurance brokers is high. In survey after survey, consumers report that they value their brokers' knowledge, professional advice, unbiased review of their needs and coverage options, and service and advocacy in the event of a claim. IBABC member brokerages have an average of 13 staff members and therefore fit within the small to medium-sized enterprise (SME) category.

Financial Consumer Protection

REVIEW QUESTIONS

Should BC consider adopting a market conduct code for fair treatment of consumers that would apply to financial institutions? If so, should there be one code for all financial institutions or separate codes for different types of financial institution?

IBABC RESPONSE

We submit that separate codes for insurance market conduct should be maintained and upheld.

During the 1990s when some segments of the financial services industry were deregulated, insurance regulations were maintained as separate and distinct from banking regulations because:

- a) Insurance protects against pure risk as opposed to speculative risk. In other words, insurance protects the assets that people can't afford to lose. For their own protection, consumers should be able to purchase insurance for their assets without inducements, pressure or coercion and have access to unbiased, professional advice in a manner that holds the customer's interests paramount. In order to provide that expertise, insurance brokers and agents are licensed, covered by errors & omission insurance, undergo ongoing mandatory education, and adhere to a strict Code of Conduct.
- b) Insurance contracts are based on the principle of utmost good faith: all parties to the insurance contract are legally obliged to reveal to the others any information that might influence the others' decision to enter into the contract. If one party fails to disclose material information, the other party usually has the right to void the agreement. The requirement to exercise utmost good faith is also a critical factor in any settlement for an insured loss. Combining insurance with other banking incentives – for example, the offer of “free” home insurance as an incentive at mortgage point of sale – or some other non-insurance inducement to purchase an insurance policy, is not a good-faith transaction.

Canadian regulations and codes of conduct for insurance sales align with international Insurance Core Principles – the best practices established by the International Association of Insurance Supervisors (www.iaisweb.org). In this way, Canadian insurance products and practices contribute to Canada's success in international trade and commerce by instilling worldwide confidence in our economy and our insurance system.

General insurance brokers, working collaboratively through their provincial trade associations, have always supported having formal educational and professional standards for their industry, and have always supported the standards of conduct set out in the Insurance Council of BC's Code of Conduct.

Should ombudservices be mandated for addressing consumer complaints against mutual insurers and/or insurance agents and brokers?

Currently, consumers have recourse through these means:

- Complaints involving licensee conduct may be filed with the Insurance Council of BC. The complaint is investigated and the licensee's actions are held accountable to the Code of Conduct. The Insurance Council has the authority to impose fines, suspend licenses or require further education.
- Complaints involving money (usually disagreements about insurance settlements) may be filed with the General Insurance OmbudService.

The Province of B.C. has established the Civil Resolution Tribunal that will assist British Columbians in resolving differences. The tribunal system, along with the online tools that are being developed, will provide guidance and resources for disputants encompassing a wide scope of issues and severities. IBABC has consulted with the developers of these online tools to ensure that they address common insurance queries, concerns and disagreements, and that they integrate with legislation and dispute resolution services already in place for the insurance industry.

Should authorization requirements for financial institutions and licensing requirements for insurance agents and brokers specifically require fair treatment of consumers?

The licensing requirements for insurance agents and brokers already require fair treatment of consumers as outlined in the Insurance Council of BC's Code of Conduct. The Insurance Council has rule-making powers that enable it to revise standards of conduct, investigate complaints, and to discipline licensees and suspend licenses.

Does BC have the correct framework for use of corporate and business names and logos, and the disclosure of identity for financial institutions?

The current framework should be extended to address online corporate representations. Financial institutions and sellers of financial products and services should identify their regulators and provide a link to the regulator's website for verification that

they are appropriately licensed. Please see our comments regarding the e-commerce recommendations of the Canadian Council of Insurance Regulators in the next section of this submission.

Market Discipline / Public Disclosure of Key Financial Risk Information

REVIEW QUESTIONS

Should FICOM be permitted to publish information it collects from financial institutions online? Are there certain types of information that should not be published or exemptions that should be provided (e.g., to particular types or sizes of institution)?

Should financial institutions in BC be required to provide information to national databases for regulatory purposes, and should FICOM be allowed to do so?

IBABC RESPONSE

We support the status quo.

Financial Literacy

REVIEW QUESTIONS

What role should financial institutions and intermediaries play in contributing to and fostering financial literacy? Are there any legislative impediments to their doing so? Do financial institutions need additional tools to help fight financial abuse?

IBABC RESPONSE

In our view, any practices that divert consumers' attention from the unbiased consideration of adequate insurance coverage for their assets are potentially coercive.

We see two areas of risk that require consumers to improve their financial literacy:

First, the disruption brought on by technology and non-traditional sellers. Decades of regulated insurance sales by licensed intermediaries have conditioned consumers to trust that the seller will recommend only the coverage options that are adequate and appropriate to their needs.

In addition, the increasing amount of electronic commerce has increased consumers' confidence level about buying small consumer items online. When a non-traditional seller of insurance uses the same marketing strategies that consumers are accustomed to when booking hotels or buying music, promising a transaction in a few easy steps, consumers may not be aware that they could be giving up:

- The default assumption that the policy

offered is tailored to their specific needs; instead, the online product is likely a basic, low-limit policy, and coverage add-on options may be limited because they often require time-consuming explanations prior to a buying decision. Without the ability to provide the primary policy, other insurers are unlikely to provide only the add-on coverages,

- The ability to develop a relationship with one advisor who learns their specific needs and is available to provide advice and information throughout the policy term,
- The ability to make mid-term changes to the policy easily,
- Advocacy, service and support in the event of a loss and a claim, or a denial of claim.

A great potential for abuse and harm will result from having two principles of purchase – “utmost good faith” as practiced by licensed intermediaries, and “buyer beware” as practiced by unregulated online sellers – active in the marketplace, with consumers being expected to fully understand the ramifications of their choice of one or the other. Even if policymakers in B.C. take the position that this two-tiered system is inevitable (a position we would disagree with) a financial literacy program spanning many years would be necessary to educate consumers.

Second, the increased need for consumers, businesses and governments at all levels to take responsibility for their own post-loss recovery costs.

It is worth keeping in mind that 40 years of a stable public auto insurance system in B.C. has contributed to a consumer mindset that all insurance products are the same, and that insurance companies must take all comers, no matter how poor their risk profile is. In addition, our social safety net over the past decades has been able to adequately rebuild public infrastructure after major losses, and provide government programs to assist when widespread consumer hardship occurs (interest-free loans for “leaky condo” repairs, for example). That may not be sustainable in light of the increased severity of natural disasters and the threat of earthquake or losses resulting from climate change.

What role should the provincial government have with respect to promoting financial literacy? Is there a need to duplicate or complement efforts being undertaken at the federal level, particularly for provincially regulated institutions?

Set an example by addressing post-disaster recovery now.

Should legislative changes to bolster financial literacy and/or protect consumers from financial abuse be considered?

Yes:

1. Prohibit the use of inducements to the purchase of an insurance contract, including the practice of making the purchase of insurance and a non-insurance product contingent on each other. See section on Rebating, page 14.
2. Require mandatory disclosure of the use of credit scoring. Section 110 of the *Business Practices and Consumer Protection Act* requires that suppliers give customers notice of denial of benefit or increase of cost of benefit arising from the information obtained in a credit report, but if suppliers are allowed to obtain credit reports without notification to the consumer, the true reason for denial can be withheld with the customer being none the wiser, and the practice of credit scoring can be abused with no repercussions.
3. Encourage increased responsibility for financial recovery after a disaster. See next item.

Do governments, including the BC provincial government, need to better communicate government policies in areas such as earthquake disaster relief? Are there other measures government should be taking with respect to earthquake or catastrophic loss insurance?

Yes, we refer you to our position paper to government entitled *Who Will Pay?* and its recommendations:

1. Clarify the role of the Disaster Financial Assistance Program.

- We acknowledge that the Disaster Financial Assistance Program determines on a case-by-case basis which losses are eligible for compensation. However, people will remain unwilling to invest in their own disaster recovery if they believe there's a chance they don't have to because government will look after them.

We urge government to clarify to consumers which earthquake-related losses, if any, would be eligible for DFA funding. Given that the current policy is that only uninsurable losses are eligible, government's

message to the public should clearly state, as California's does: "Without earthquake insurance, the cost of any damage is your cost." Outline government's priorities in recovering essential services for life, health and mobility, and educate British Columbians about their responsibility to mitigate their own private-property losses by buying insurance and making continuity plans. If government programs will be available to help consumers post-loss, provide clarification to the insurance industry so that we can advise clients accordingly.

2. Establish a provincial Earthquake Recovery Task Force now.

- The BC Earthquake Immediate Responses Plan recently released by Emergency Management BC appropriately outlines in detail EMBC's plan for immediate and sustained response, but leaves recovery to a future task force. *Government should establish that task force now, with a mandate to develop a post-loss recovery strategy.*

3. Lead a culture shift in planning for recovery funding.

- *Establish a financial backstop for disasters such as earthquake, floods, and severe weather.* Governments must shift away from the traditional "disaster relief" approach, which has been to wait until after disaster hits and then go looking for funds for recovery.
- *Require essential-service institutions to prepare.* Disaster preparedness requires a top-down commitment. For example, Japan's swift response to the 2011 earthquake and tsunami contributed to minimizing the damage because it had: a) Quake-resistant construction and technology; b) Enhanced safety and early-warning systems on transportation, c) Disaster education and preparedness throughout Japanese society. In 1961 Japan established the national Central Disaster Management Council, chaired by its Prime Minister and comprising all government ministers and heads of media, banking, public utilities, health services,

telecommunications and academia. This council provided the leadership for a national movement in disaster preparedness and reduction.

- *Work with the private sector to promote disaster management planning and funding:*

A) Promote business continuity planning. Working with municipalities and SME groups, generate a culture of disaster-management planning.

B) Banks, credit unions and lending institutions can assist by disclosing to clients what their obligations will be in the event of a loss of the mortgaged property due to earthquake or other disaster. Many British Columbians have most of their equity in their real property and would be financially ruined by a devastating loss to that property. Consumers should be encouraged to include the cost of risk reduction or disaster recovery in their total debt-service-ratio calculation.
- *Develop a provincial earthquake strategy for strata properties.* Mandate readiness plans to include contingencies for the high displacement of people from strata properties, especially vertical stratas. Require depreciation reports to include an emergency-preparedness component, i.e., include the earthquake insurance deductible amount as a potential cost to be managed, and show the amount for which each owner would be responsible.
- *Consider a consumer and corporate tax credit or grant towards paid earthquake insurance premiums.*
- *Educate consumers.* Financial literacy must include understanding and acceptance of financial responsibility for recovery after a disaster. In addition to the importance of having a “grab-and-go” kits, emergency-preparedness education should include the importance of having emergency funds. Policyholders who can pay their insurance deductibles quickly will have their claims settled earlier.

4. Make legislative changes now for faster reaction times post-loss.

- *Empower government to regulate pricing and availability for recovery of infrastructure, goods and services. In the recovery phase, government may choose to contract for all available capacity (for example, for debris removal) to ensure availability and pricing consistency across the board.*
- *Eliminate insurance brokers’ liability post-loss for indiscriminate claims and lawsuits emanating from consumers’ failure to purchase earthquake coverage. Post-loss uncertainty about coverage – potentially exacerbated by a lack of full disclosure by government – could put brokers at risk of law suits.*
- *Extend existing ICBC auto insurance registration and licensing in the event of a loss.*

Technological Change

REVIEW QUESTIONS

Are there any barriers or impediments to using new technology in the current legislative and regulatory framework (e.g., for member engagement, provision of products and services, etc.)? What changes are needed to ensure the regulatory framework continues to enable and accommodate technological change, now and in the future?

IBABC RESPONSE

We submit that the focus of regulators should not just be on how to “enable and accommodate technological change”, but also on how to ensure that consumer protection and level playing fields are maintained as the technological changes make their inevitable inroads into the financial services sector.

Insurers are developing sophisticated systems for business-to-business (i.e., broker portals) and business-to-customer (direct sales) electronic commerce. Insurance brokerages and agencies are also seeking ways to facilitate sales and services in the ways that each of their customers prefer – face-to-face, online, mobile, digital, or any combination thereof.

Two major insurers (Intact Financial and Aviva Canada) announced in 2015 their intention to offer online direct sales to B.C. consumers. The trend

toward online sales of insurance is being driven by:

- The economy-wide comfort and confidence consumers increasingly have with internet shopping,
- The race to collect and mine Big Data for competitive advantage,
- The economies and efficiencies that come with eliminating the labour-intensive aspects of sales and reducing the level of service to consumers.

In other provinces (Quebec, for example) where a larger portion of insurance sales are conducted online than is currently the case in B.C., we are told that up to 80% of insurance shoppers abandon the online transaction because it's too complex. Insurance sellers will seek ways to improve these closing ratios by making the transaction simpler, faster and more "fun" at the expense of providing information, choice and explanations of coverages. To safeguard their own interests, these online sellers will put the onus on the customer to know what they are buying – in other words, they will be "buyer beware" transactions.

Going further, cloud storage, data warehousing and mining, and the interconnectivity of devices and systems are creating opportunities, but also potential risks for consumer privacy and protection that are not yet fully realized.

Are any changes needed to ensure consumers continue to be protected and provided with the information they need to make informed choices?

Are there certain financial products or services that should not be available for purchase directly by consumers online without using a professional broker or financial advisor at a regulated institution?

We support the recommendations in the Canadian Council of Insurance Regulators' final *Position Paper – Electronic Commerce in Insurance Products* available online at http://www.ccir-ccrra.org/en/init/Elec_Commerce_electronic_com.asp

The key principles of the paper are:

- Consumers should have access to information and proper advice during the insurance transaction, regardless of how they contract the insurance product and should be made aware of the importance of that advice.
 - Consumers should be able to verify that they are dealing with a regulated entity.
 - Consumers should receive and understand the necessary information about the insurance products offered.
 - Consumers have the opportunity to review the accuracy of the insurance application.
 - Consumers are aware of the terms and
-

conditions of the insurance policy.

- Consumers can rely on the transaction.
- Consumers' personal information is secure.

Are there consumer protection and regulatory issues related to record storage or retention?

Should there be limits on what kinds of data can be entrusted to a third-party service provider for storage and/or processing?

We are not aware of any problems or issues related to record storage or retention. Insurance brokerages comply with requirements of Canada Revenue Agency, their insurers, B.C.'s *Freedom of Information and Protection of Privacy Act*, *Personal Information Protection Act* and *Privacy Act*, and the federal *Personal Information Protection and Electronic Documents Act*.

As agents of a Crown corporation (i.e., ICBC) Autoplan brokers must comply with the *Freedom of Information and Protection of Privacy Act*, which electronic data to be stored within Canada. This requirement was put into legislation on the recommendation of the B.C. Privacy Commissioner based on concerns at the time about the far-reaching powers of U.S. legislation commonly referred to as the Patriot Act. Since then some experts have argued that those initial concerns were unfounded. The B.C. insurance brokerage industry has found a wide range of suppliers that are easily able to meet *FOIPPA*'s requirements, so we see no need for a change at this time.

Out-of-province Business

REVIEW QUESTIONS

Are changes needed to BC's approach to insurance regulation? Should certain exemptions be available in respect of individuals and entities (including societies and self-insurers) seeking to purchase insurance outside BC? On what basis should exemptions be provided?

Are changes to the current legislative framework needed to address the use of technology by out of province entities providing financial products and services to British Columbians?

Do the current definitions of what constitutes "carrying on business in BC" need to be revisited in light of increased e-commerce/online distribution of financial products?

IBABC RESPONSE

As of January 1, 2010, amendments to Part XIII of the federal *Insurance Companies Act* created new rules for insurance companies operating in Canada. Canadian risks are defined as those which are insured in Canada, rather than those which are simply located in Canada. The emphasis is on the location of the business activity which creates the insurance contract.

B.C. responded to these changes by:

- bringing the *Extraprovincial Insurance Corporation (Canada) Business Authorization Condition Regulation* into force, adopting the Part XIII changes for B.C.
- amending the *FIA* with Bill 5, 2009. In it, "insurance business" is redefined as

occurring in B.C. – and therefore subject to B.C. legislation – if the risk or peril is located in B.C. The amendments also provided for B.C. licensees and B.C. residents to procure a contract of insurance with an unlicensed carrier within prescribed regulation.

We are not aware of any problems or issues arising from these changes.

Regulatory Powers and Guidelines

REVIEW QUESTIONS

Should FICOM have the ability (i.e., with authority provided in legislation) to issue enforceable prudential and market conduct requirements and standards/rules? If so, what limits on that power and accountability mechanisms are needed (e.g., oversight/approval role for government, appeal process, etc.)?

IBABC RESPONSE

Yes, we support FICOM's authority and ability to issue enforceable prudential and market conduct requirements and standards/rules.

Insurance Retailing and Licensing Exemptions

REVIEW QUESTIONS

Are the current exemptions appropriate? Should any additional exemptions be provided?

IBABC RESPONSE

We submit that the current exemptions are not working in a manner that provides consistent protection to the public. One example of this inconsistency is travel insurance.

Travel insurance can be sold by licensed general insurance agents, and those sales are subject to those licensing regulations as administered by the Insurance Council of BC. Travel insurance can also be sold under a conditional or restricted exemption by travel agents licensed with Consumer Protection BC and subject to its regulatory oversight.

The stories of denials of travel-insurance claims frequently make media headlines. The losses suffered are high, often resulting in severe financial hardship for the insureds – hardship made worse by the illness or injury that was suffered.

The Canadian Council of Insurance Regulators has also recognized that travel insurance is in need of review, and has included this priority in its 2014-17

Strategic Plan:

- **...Undertake new initiatives related to Travel Insurance:** Review of the industry including the activities of call center support providers, policy wording and pre-existing condition exclusions, and adequacy of information being provided to consumers in both on-line sales and in-person sales.

We agree that the travel insurance product, and the regulatory structure relating to its sale, should be reviewed.

Another area in which insurance licensing exemptions are inconsistently applied relates to motor vehicle dealers.

The *Insurance Licensing Exemptions Regulation* exempts vehicle dealers from licensing requirements for the sale of vehicle warranty insurance. However, motor vehicle dealers also sell a number of other insurance products incidental to the sale of a vehicle, and new products are continually being developed, creating a potential for consumer confusion and lack of protection. We support a review of the regulatory regime for insurance products sold by vehicle dealers, ensuring a restriction to incidental insurance product sales, and also support the Insurance Council of BC having responsibility for regulating all insurance activities conducted by vehicle dealers.

Should insurers have more responsibility for exempt sellers? Should they be required to provide more direct oversight?

No, the Insurance Council of BC and other appropriate regulators should have oversight, with no exceptions.

Should the FIA be amended to give the Insurance Council increased powers to license and regulate incidental sellers of insurance?

Yes, the *FIA* should be amended to give the Insurance Council powers to license and regulate incidental sellers of insurance.

Should certain insurance products only be sold by licensed agents? If so, which ones?

Because of the complexity of all insurance products, licensed insurance brokers and agents should be involved in their sales, with very few exceptions.

Should the restricted insurance agent model used by some other provinces, and applicable to travel agencies in BC, be looked at with respect to the sale of other types of incidental insurance such as credit insurance and/or product and vehicle warranties? If so, which types?

No, we do not support the restricted insurance agent model. We believe there should be fewer types of insurance products exempted from sales licensing and that there should be more precise regulation of sales of these products.

Is the current restricted licensing regime for travel agencies effective and appropriate?

As noted above, the current exemptions are failing the public in terms of coverage exclusions, claims

Should travel agents, who are already regulated by Consumer Protection BC, be provided with an exemption under the FIA?

denials, lack of proper disclosure and explanation to consumers at point of sale, the high levels of disputes, and the high levels of loss.

Regulation of Insurance Intermediaries

REVIEW QUESTIONS

Should some or all members of the Insurance Council of BC be elected?

IBABC RESPONSE

Yes, we support the election of members of the Insurance Council of BC, as it broadens the transparency and engagement in the process. We submit that the governance structure of the Insurance council should be reviewed to ensure that it reflects the modern regulatory needs of the public and the insurance industry.

Does the Insurance Council have the right regulatory tools and structure for its role? Are any improvements needed to enhance coordination between the supervisory and intermediary regulatory authorities?

The determination of the appropriateness of the Insurance Council's regulatory tools and structure should be included in the review noted above.

Is the current oversight framework, including appeals to the Financial Services Tribunal, effective? If Insurance Council members are elected, are changes needed to other aspects of the accountability framework?

This should also be part of an overall review.

Should special brokers in BC be required to obtain licences directly from FICOM?

This is currently not an issue in BC, and we submit that no change is required.

Rebating

REVIEW QUESTIONS

Is the current FIA rebating framework effective and appropriate?

Is the threshold of 25 percent of the premium appropriate? Would a different level be more appropriate, and if so, what level?

IBABC RESPONSE

We submit that the *FIA* rebating framework – *FIA* sec 79 (1), *Marketing of Financial Products Regulation*, sec 2 – was the wrong response 10 years ago, and that it has not worked in the manner it intended.

Background: The previous *FIA* prohibited rebating as a means of regulating against solvency (i.e., preventing financial-services firms from getting into drastic price-cutting wars that could end in bankruptcy, thereby creating hardship for consumers). In reality, the prohibition was difficult to enforce because the Financial Institutions Commission lacked powers to impose administrative penalties. That meant it could order a firm to cease its rebating activity, but if it

refused, FICOM's next recourse was to seek a Criminal Code conviction; there was no middle ground. There was ambiguity around the definition of rebating, which put FICOM in the position of refereeing complaints between industry peers about "trinkets" and small give-aways. Meanwhile, larger-scale rebating was occurring unimpeded to the detriment of the market place; for example, a rebate on home insurance with the purchase of a mortgage, leading to promotions of "free insurance".

The 2004 amendments to the *FIA* dealt with some of the shortcomings of the previous act regarding the rebating prohibition, namely a clearer definition of rebating, a test of materiality and the power for FICOM to impose administrative penalties. However, it allowed rebating to a maximum of 25% of the premium. While this may have been done with the best of intentions – as a "wisdom of Solomon" compromise – it actually allowed the detrimental aspects of inducements to continue.

Much actuarial and accounting expertise goes into "right pricing" of insurance products to meet the solvency and capital requirements of regulators, anticipate known and unforeseen losses, and still offer the consumer the most competitive rates. Promotions are designed to promote loss mitigation and prevention.

Insurance brokers do not set rates; insurers do. Since insurers do not, and should not, rebate premium, any rebating offered by the agent or broker is a sacrifice of his/her commission. The current allowable rebate of 25% of premium exceeds the amount of commission paid to property and casualty brokers in almost all cases. Therefore, the broker would be rebating more premium than is collected in commission. Would the rebate come from the broker's proceeds or from the insurer's funds deemed to be held in trust? Neither could be what was intended by government in the design of the current situation.

It is potentially harmful to consumers to divert their attention away from the coverages they should consider by enticing them with a "free gift with purchase". In this regard, rebating is coercive. Coercive tied selling is prohibited by statute. Therefore it follows that rebating should be prohibited as well. The offer of inducements to enter into a contract should not be allowed. We recommend that unfair or

deceptive acts or practices, including rebates and other inducements, be specifically prohibited for the sale of insurance. We suggest as a template the Ontario Regulation 7/00, *Unfair or Deceptive Acts or Practices Regulation*,
<http://www.ontario.ca/laws/regulation/000007>

Are the current disclosure rules on referral payments adequate to protect consumers?

In our opinion the current disclosure rules are adequate.

Should agents also be required to disclose the amount of any referral payment?

Further information:

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