

## Policy on the Approval of Public Statements

Document 217070

### Context and Purpose

A public statement is intended to delineate the views of the Institute. A public statement may take the form of a position on a current or emerging issue or it may take the form of a submission or an opinion letter to an external audience. This policy outlines the approval process for public statements including those requiring member input and Board ratification.

Communication tools (e.g., a press release, a letter to the media, opening comments for an appearance before a public committee, media interview Q&As) consistent with approved public statements will be prepared by the CIA's internal and external expert resources, and be approved by the President.

### Scope

This policy is for use by the Board, the CIA Public Statements Committee (PSC), and other Institute bodies (e.g., councils, committees, task forces, and designated individuals) assigned with drafting public statements on behalf of the Institute.

The Institute may issue a public statement where the subject has an actuarial aspect, pursuant to **Section 19 – Public Statements** of the Bylaws, which states, in part:

The Institute may issue a public statement within the competence of actuaries that is consistent with its mission, vision, and values. An Institute public statement need not limit itself solely to statements of fact, but may also draw inferences from statements of fact, express opinions, and advocate, in order to provide the public with the benefit of the full range of the profession's capabilities.

Public statements may be supported by research conducted or overseen by the Institute.

The process for the development of public statements (outlined below) that are considered by the Board or by the President, in consultation with the Executive Director and the chair of the PSC, to have a substantial element that goes beyond actuarial considerations will include Board approval of the topic, the creation of a Single Topic Task Force (STTF), with a champion, opportunities for member input, and will require Board ratification of the PSC's approval of these statements as described below.

This policy has been drafted to cover all public statements, and identifies the additional steps to be followed on those statements requiring Board ratification and member input. The PSC will provide oversight of the public statement process including drafting, the identification of spokespersons, promotion, distribution, and management of public statements, approval of notices of intent, and the degree of advocacy adopted for any statement.

## Policy Statements

### 1. Development of a Public Statement

The steps outlined below will be followed in the development of all public statements. With regard to this policy, the President-elect and the director of communications and public affairs would fulfil the roles of the President and the Executive Director, respectively, in their absence.

#### A. Types of Public Statements

There are two types of public statements:

- a) **Level 1** – A public statement which requires only PSC approval (i.e., will not require member input and Board ratification).

Such a statement would be developed if/when

- i. An external request for comment is received or a response is requested of the CIA on a topic; and
- ii. The topic does not have a substantial element that goes beyond the scope and content of existing actuarial standards of practice, guidance, research, or public statements.

Such statements would include, for example, the following:

- i. A response to a request for comment/input on a proposed standard of practice from another association (e.g., International Actuarial Association, Accounting Standards Board);
- ii. A response to a regulator's request for clarification of a CIA standard of practice or guidance note; or
- iii. A response to a proposal from a government entity or from a regulator for new legislation or guidelines related to an existing CIA standard of practice or guidance note;

A minor update to an existing public statement may also be considered a level 1 statement as long as the core message of the statement remains the same.

- b) **Level 2** – A public statement which will require member input and Board ratification prior to its release.

Such a statement would be developed if/when

- i. The Board determines that it should proactively draft a public statement on a particular topic (i.e., there is not yet a specific external request for such a statement); or
- ii. An external request for comment is received or a response is requested of the CIA on a topic which has a substantial element that goes beyond the scope and content of existing actuarial standards of practice, guidance, research, or public statements.

Such statements would include, for example, the following:

- i. A new public statement in a non-traditional practice area;

- ii. A statement in a traditional area of practice which would, however, require the CIA to take a position which has not yet been clearly articulated in previous statements; or
- iii. Any public statement on which it could reasonably be expected that there would be a significant number of differing views on the topic within the membership.

#### **B. Decision to Issue a Public Statement**

The PSC shall normally identify and recommend to the Board annually, topics on which the CIA should develop a public statement, from which the Board will typically identify one or two topics on which it will authorize the PSC to develop and issue a public statement. Such public statements would be categorized as level 2 statements.

If the need arises throughout the year, the President may also authorize the development of a public statement on a particular topic and would determine the type of statement (level 1 or level 2), and the related development and approval process that would be appropriate for the topic.

This decision to develop a public statement will be made taking into account the considerations outlined in appendix A.

#### **C. The Process**

##### **a) Level 1 Public Statements**

- i. Once a topic is identified as a level 1 public statement, the Executive Director shall formally advise the PSC of the topic of the public statement to be developed (if they are not yet aware).
- ii. The PSC proceeds with the development of the public statement and, in consultation with the President and the Executive Director, shall appoint a drafting entity (committee, task force, or specific individual(s)) to draft the public statement on the given topic.
- iii. The President, in consultation with the Executive Director and the chair of the PSC, may identify specific individuals or groups, inside or outside of the Institute (referred to as interested parties) who will be requested to review the public statement before it is approved.
- iv. The drafting entity may choose to seek input from members and other interested parties if it feels that such input would be helpful in the development of the public statement.

##### **b) Level 2 Public Statements**

- i. Once a topic is identified as a level 2 public statement, the Board shall create a Single Topic Task Force (STTF) which shall serve as the drafting entity, and appoint a champion, normally recommended by the PSC, to lead the development of the public statement and to coordinate any supporting research that may be needed.
- ii. The President, in consultation with the STTF champion, the Executive Director and chair of the PSC, may identify specific individuals or groups, inside or outside of the Institute (referred to as interested parties), who

will be requested to review the public statement before it is approved.

- iii. At an early stage, the STTF will develop a notice of intent (NOI) which shall be approved by the PSC and circulated to the membership for comment. The NOI will
  - a. Describe the issue and key components of the anticipated public statement;
  - b. Request member input;
  - c. Provide sufficient background and detail on the proposed statement to enable members to understand the Institute's objectives in developing the statement;
  - d. Identify an anticipated timeline for the release of the public statement;
  - e. Identify the members of the STTF; and
  - f. Allow a minimum period of 14 days for member input.
- iv. Following member input on the NOI, the STTF will prepare at least one formal draft of its work for publication, close to the end of the development process. The draft will be circulated to members for comment and will include a cover memo which will
  - a. Provide an overview of the topic;
  - b. Summarize the input received on the NOI and describe how it was addressed;
  - c. Identify an anticipated timeline for the release of the public statement;
  - d. Identify the members of the STTF; and
  - e. Allow a minimum period of 30 days for member input.
- v. The CIA Head Office will hold at least one public hearing for the draft public statement, normally within four weeks of its release. Such hearing(s) may be a webcast, a series of town hall meetings, a session at a meeting of the Institute, etc.
- vi. Once all input is received, the STTF shall proceed with drafting the final version of the public statement.

## **2. Approval of a Public Statement**

- a. Once the drafting entity/STTF completes its work on the drafting of the public statement, the statement shall be sent to the CIA Head Office for a communications review (i.e., editing, formatting, translation).
- b. As soon as the public statement is finalized, the drafting entity/STTF, with assistance from the CIA Head Office, shall send it to the PSC for review and approval along with a report that includes the following:
  - i. The drafting entity/STTF's recommendation that the public statement be approved and released;
  - ii. *(For level 2 public statements only)* Confirmation that the required steps

outlined in section 1B above were followed in the development of the public statement;

- iii. If input was sought or obtained from members and interested parties, a summary of the input received, how it was obtained (i.e., comments, webcast, town hall meetings, etc.) and a description of how the input was addressed in the statement; and
  - iv. A recommended release date.
- c. The chair of the PSC shall appoint at least three members to serve as the authorizing committee for a level 1 public statement, and five members for a level 2 public statement.

It is desirable that a majority of these members be from the practice area addressed in the public statement and that other members are outside the practice area. These requirements are waived if the public statement is not specific to a particular practice area.

If the President is not part of the drafting entity, then he or she must be one of the authorizing committee members.

- d. The CIA Head Office shall send the public statement and its accompanying report to the authorizing committee for review.
- e. The authorizing committee will then render one of the following decisions:
- i. Approve the public statement as written;
  - ii. Approve the public statement subject to minor editorial corrections, which may be done in coordination with the Head Office and/or the drafting entity/STTF;
  - iii. Return the public statement to the drafting entity/STTF for further editing, along with the reasons for the return. The drafting entity/STTF will then re-edit the public statement and commence the approval process once again; or
  - iv. Request that the drafting entity expose (level 1) or re-expose (level 2) the statement to the members for further input.
- f. The authorizing committee may not wordsmith the public statement or substantially change the content.
- g. For a level 1 public statement, once the public statement is approved by the authorizing committee and finalized, the CIA Head Office will send the public statement to the PSC with confirmation that it is ready for release.
- h. For a level 2 public statement, the CIA Head Office will send the public statement to the PSC. The PSC, with assistance from the CIA Head Office, will send the statement to the Board for ratification, prior to its formal release.

Once the public statement is ratified by the Board, the CIA Head Office will send the statement to the members for information, prior to its external release.

If the Board does not ratify the public statement, it will return the statement to the PSC, along with an explanation and rationale as to why the Board could not ratify the statement. The PSC will then decide to

- i. Send the statement back to the drafting entity;
- ii. Abandon the public statement; or
- iii. Determine another suitable course of action.

### **3. Publication, Distribution, and Notice to Members**

- a. Once the public statement is approved and ratified as required, the CIA Head Office will, with PSC oversight, publish and distribute the position.
- b. The membership shall be notified of the public statement established by the Institute and will be provided access to the report of the drafting entity.

### **4. Spokespeople for Institute Public Statements**

Once a public statement is fully approved and ratified as required, one or more individuals will be authorized to speak to the press or to an external body on said public statement on behalf of the Institute. Such spokespeople will be designated in the following manner:

- a. The PSC will identify appropriate spokespeople for a public statement. The spokespeople will thereby be empowered to speak, on behalf of the Institute, to the press or to any other external body on the given topic in both official languages. Typically, the spokespeople would be drawn from the drafting entity and include any champion initially approved by the Board.
- b. The spokespeople will represent, to the best of their ability, the spirit and intent of the public statement.
- c. The CIA communications and public affairs team will work with the spokespeople to develop a communications plan that will govern the dissemination of the position once it is completed and approved.
- d. The approved list of spokespeople will be reviewed by the CIA communications and public affairs department annually to ensure currency.

### **5. Urgent Response Team**

In cases where an urgent response or communication is required by the Institute on an important issue, the President, in consultation with the Executive Director and chair of the PSC, will appoint an urgent response team to respond on behalf of the Institute. This form of response will ordinarily be used when a response is required within a few hours or days.

These responses will be based on previously approved CIA statements and positions and will not require broad member input or Board ratification.

The urgent response team will consist of appropriately qualified members who will be authorized to develop an official response and speak, on behalf of the Institute, to the press or any other external body, on the given topic.

Should a formal CIA public statement be deemed necessary, the process outlined in sections 1 through 3 above would then be followed to formally establish and publish a formal public statement on the given topic.

### **Exemptions**

N/A

**Escalation Procedures/Management of Non-compliance with this Policy**

N/A

**Definitions and Abbreviations**

N/A

**Associated Documents**

Bylaws (section 19)

**References**

N/A

**Monitoring, Evaluation, and Review**

Approval date	December 8, 2016
Effective date	July 1, 2017
Approval authority	Board
Review owner	MSC
Prior review and revision dates	N/A
Review cycle	5 years
Next review date	2022

**Procedures****Appendix A – Criteria for Developing CIA Public Statements**

# Appendix A

## Criteria for Developing CIA Public Statements

### 1. Strategic Considerations

- 1.1 Is creation of a public statement consistent with the CIA's vision, mission, values, and strategic direction?
- 1.2 Can we reasonably expect that development of a statement will bring value to the public and be worth the effort and resources required to create it?
- 1.3 Can a statement be developed that reasonably reflects the views of members?
- 1.4 What are the risks/rewards to the CIA?

### 2. Applicable CIA Guiding Principles

- In carrying out its activities and programs, the Institute holds the duty of the profession to the public above the needs of the profession and its members.
- The Institute promotes the development of a body of expert actuarial knowledge and practice relevant to Canadian social and economic needs. It encourages actuarial research and scholarly activity and the dissemination of the results among its members. It encourages the application of actuarial science and technique to new areas where these are relevant.
- The Institute cooperates with governments and public bodies and makes timely and relevant contributions to public policy issues.

### 3. Applicable CIA Bylaws

#### Section 19 Public Statements

Subject matter     **19.01** The Institute may issue a public statement within the competence of actuaries that is consistent with its mission, vision, and values. An Institute public statement need not limit itself solely to statements of fact, but may also draw inferences from statements of fact, express opinions, and advocate, in order to provide the public with the benefit of the full range of the profession's capabilities. **[Modified July 1/17]**

Procedure            **19.02** (1) Such public statements shall be made in such manner and upon such terms and conditions as the Board may determine from time to time. **[Modified July 1/00; Modified July 1/17]**

(2) In accordance with the terms and conditions established under Bylaw 19.02 (1), the process will include member input and Board ratification when the public statement is considered by the Board or, alternatively, by the President, to have a substantial element that goes beyond the scope and content of existing actuarial standards of practice, guidance, research or public statements. **[Adopted July 1/17]**