

TO: MEMBERS OF THE FACILITY ASSOCIATION

DATE: May 13, 2024

SUBJECT: Update to FA Members on the Launch of IBC DASH product

At its April 2024 meeting, the Facility Association (FA) Board of Directors passed a resolution **appointing the Insurance Bureau of Canada (IBC) as an Additional Provider of UIP Data**, with appointment effective immediately. Subsequent to this appointment, IBC has advised FA that it expects to launch its consumer UIP report product (DASH) at the beginning of June 2024.

FA continues to work closely with both **IBC (DASH)** and **CGI (AutoPlus)** to ensure the continuing availability and provisioning of UIP data to all FA members for their underwriting and risk assessment purposes.

UIP Purpose

Through FA's Plan of Operation, the FA Board of Directors has an obligation to ensure that agreements entered into for the UIP meet the Purpose of the UIP, and ensure the appropriate operation of the UIP.

FA currently has an agreement with CGI, on behalf of members, to provide all members' access to UIP data in all jurisdictions in which FA operates. The agreement also includes specific conditions and controls to ensure that in all cases, FA can guarantee the continuing availability of UIP data to all FA members, including the circumstance where an Additional Provider is appointed.

FA's accountability is first, to ensure continuity of service for the industry, including a guarantee to all FA members that the addition of a second supplier in no way diminishes the availability of UIP data to all FA members. Second, any and all providers of UIP data must have appropriate controls and processes to safeguard the security, privacy and accuracy of the Personally Identifiable Information contained within UIP.

As you are likely aware, IBC has developed DASH, a competitive product to the AutoPlus product offered by CGI. In 2021, FA entered into a Data Access Agreement with IBC to allow for the provision of UIP data to IBC, and to permit the commercial availability of UIP data at such time as they were able to meet the requirements under FA's governance.

Approval Framework

There are the two critical accountabilities by which FA reviews and considers an application from any party to become an approved supplier of UIP data/ reports to the industry.

First, the potential appointee must **ensure continuity of UIP service to all FA Member Insurers**, has been safeguarded by requiring access to whatever product is supplied open to any and all FA member companies in all jurisdictions in which FA operates. Thus a provider must offer reports in all FA jurisdictions, and they must offer to all FA member insurers. This criteria has been fully and completely met by IBC in their application, and it has been confirmed that non- IBC member insurers, who are nonetheless members of FA, will be able to purchase DASH reports without it being tied to IBC membership.

Second, the appointee must have **appropriate controls and processes to safeguard the security, privacy and accuracy of the Personally Identifiable Information contained within UIP**. This three part criteria is at the heart of the due diligence which FA and its committees has undertaken. The obligation on FA to make these assurances is not only contractual within our existing structure of relationships, but is obligated on FA by the FA Plan of Operation, as well as from the network of federal and provincial legislation covering privacy and data. Put succinctly, FA has a legal obligation, as well as an industry expectation, that appropriate controls will be in place to protect consumers' and the public's data privacy, security, and accuracy.

For consistency, FA has used the criteria of the Federal Office of the Privacy Commissioner **Privacy Impact Assessment (PIA)**, to organize its review of eligibility. Since the ongoing use of this framework is part of the existing contract terms for both CGI and IBC, it forms a clear and universal framework for judging the fitness of any application, and the applicant's readiness to go to market.

Throughout the process, FA has consulted with members of FA's longstanding UIP Advisory Committee, which is made up of industry representatives familiar with the uses and structure of UIP data and reports. The work of this Committee, representing a cross section of FA member companies, and including the majority of large market share personal lines auto insurers, has established the critical information and level of data accuracy required for UIP data reports, regardless of their supplier.

The Data and Technology Governance Council of the FA Board of Directors, which includes Board Directors augmented by specialist advisors in the area of technology, privacy and data governance. This group has considered the materials, which includes both presentations and submissions from IBC/ DASH as well as from external advisors to FA consulted for the establishment of a control framework, and from FA management.

Data Accuracy and Consistency Review

The consistency of the data at the core of DASH and CGI AutoPlus (pre-existing provider) is a central requirement for the UIP. The UIP data contract requires any UIP provider to prove, before they launch their product, that the data being used in their product reconciles with the data being used by existing UIP providers (CGI in its AutoPlus product) and that the data is being reported accurately. It is understood and accepted that different products will be designed differently and may report the same information in a different but reconcilable manner. This provision was set, and is a contractual condition for use of UIP data, in order to minimize impacts on consumers by ensuring that consumers and insurers do not receive reports from competing products that provide conflicting information.

The consequences to the industry of a failure in this regard would be substantive. Policies based on inconsistent data would not only require expensive reissuance and re-rating, but would pose a reputational threat to the industry.

FA's review process to confirm the privacy and accuracy of the Personally Identifiable Information contained within UIP, and consistency across UIP data providers included two stages:

- i. A detailed review and validation of a smaller subset of individual driver reports to confirm data structure and identify (any) critical/significant issues that may have an impact on consumer privacy, consumer data and information accuracy, that may undermine review and need to be resolved/addressed; and
- ii. A review of a larger sample (20k driver reports) to review consistency of data between IBC DASH and CGI AutoPlus reports.

Further to the review, FA and IBC have **identified 16 product differences between IBC DASH and CGI AutoPlus reports**. The data accuracy review process has provided FA with reasonable confidence that systemic observed differences in the DASH and AutoPlus reports are driven by these product differences.

Please note that FA's review was based on a subset of data (20k driver reports). Further product differences between IBC DASH and CGI AutoPlus may be identified in the future. FA will work with all parties to ensure ongoing Industry data governance requirements are met.

A listing of identified product differences with comments from IBC and CGI are included as an appendix and will be posted on FA's website at www.facilityassociation.com under Members > Resources > UIP.

FA Approval

Over the last year, FA has continued to work closely with IBC, as IBC prepares for the launch of DASH.

- FA is fully satisfied that the DASH product will be available to all FA member insurers, albeit at different price points and arrangements, but nonetheless fulfilling the criteria of appointment;
- IBC has provided a report from the firm PWC matching IBC/ DASH's designed controls to the individual contract provisions for access to UIP data, FA and IBC have worked together to ensure the controls and control framework designed covered all areas required by both the UIP data agreement, and the PIA provisions;
- FA has worked closely with IBC and CGI to conduct DASH report testing to ensure the reasonable consistency of critical underwriting/risk assessment data elements at the core of DASH and AutoPlus reporting

FA continues to work with all parties to ensure the continuing availability of UIP data and ongoing Industry data governance requirements are met. For any questions, please contact FA Member Services (ms@facilityassociation.com).

Appendix: Product Difference between CGI AutoPlus Report and IBC DASH Report

as of 2024-05-13

Item	Summary	CGI AutoPlus Report	IBC DASH Report
Source	<p>CGI AutoPlus report includes data sourced from additional supplementary data (non-UIP), which includes a separate feed for additional drivers. Historical supplementary data (non-UIP) provided to CGI would not be available in the IBC DASH report.</p>	<p>CGI AutoPlus data sources:</p> <ul style="list-style-type: none"> • ASP/UIP Data: collected from insurers by GISA’s statistical service provider, on behalf of FA; • Data corrections reported by the insurers • CGI Supplementary data, separate (non-UIP) data feeds provided to CGI from some insurers on a voluntary basis, this includes additional operator information and zero-dollar claims 	<p>IBC DASH data sources:</p> <ul style="list-style-type: none"> • ASP/UIP Data: collected from insurers by GISA’s statistical service provider, on behalf of FA, includes policy and claim information dating back to 2002; • UIP Seed Data provided by FA was reviewed and determined that the data could not be used for DASH transactional reporting, UIP Seed Data was used to supplement pre-2002 data and limited updating of reported vehicle term (start date) information and individual driver information for reported claims; • IBC Supplementary data, separate (non-UIP) data feeds will be provided to IBC from some insurers on a voluntary basis, this includes additional operator information and zero-dollar claims
Driver Profile	<p>CGI AutoPlus report uses supplementary data (non-UIP) with the UIP data to determine the Inquired Driver Profile whereas IBC DASH uses the ASP/UIP data to determine the Driver Profile.</p> <p>ASP/UIP data only includes reported “Principal Operator” Name and Driver’s License and “Rated Operator” Gender, Number of Year’s License and Year of Birth. Principal and Rated Operators can be different individuals.</p>	<p>CGI AutoPlus uses supplementary data to determine operator Year of Birth and use ASP/UIP fields to determine operator Name and Gender field.</p>	<p>IBC DASH uses ASP/UIP data and DASH Supplementary data to determine the driver profile information, including DLN, Name, Date of Birth, Marital Status, Gender, and Driver Training.</p> <p>For the operators that are reported in the ASP/UIP data, the profile information is included under Principal Operator and Rated Operator sections. Since some information in the ASP/UIP record may pertain to a Rated Operator who is “occasional” (and different from the Principal Operator), IBC DASH implemented logic to use the profile information from “non-occasional” Rated Operators.</p> <p>For any operators that are not reported in the ASP/UIP data (this includes “occasional”, and any other additional operators) the profile information is based on the DASH Supplementary data.</p> <p>Since the ASP/UIP data includes only the Year of Birth, insurers can also report the full Date of Birth for all drivers through the DASH Supplementary data. IBC DASH will display the full Date of Birth in the driver profile, if available.</p>
Driver Profile Request	<p>CGI AutoPlus does not return driver licenses that do not align with their jurisdiction format.</p> <p>IBC DASH will return driver licenses that do not align with their jurisdiction format.</p>	<p>CGI AutoPlus does not return reports for driver licenses that do not align with the specified jurisdiction format.</p>	<p>IBC DASH will return reports for driver licenses that do not align with the specified jurisdiction format, if they were reported in the ASP/UIP data and passed the ASP edits.</p>

Item	Summary	CGI AutoPlus Report	IBC DASH Report
Policy Coverage Period	IBC DASH determines the coverage period on a driver basis while CGI AutoPlus shows the coverage period on a policy basis.	CGI AutoPlus report shows the full policy coverage period based on a policy basis.	<p>For each driver, IBC DASH determines the coverage period based on the policy terms in which the driver was listed on the policy.</p> <p>The coverage period extends from the effective date of the earliest policy term in which the driver is listed, to the expiry or cancellation date (whichever is earlier) of the latest policy term in which the driver is listed.</p>
Policy Effective Date	For older policies (prior to 2010) reported through ASP/UIP, policy year and month were required, but day was not required.	In CGI AutoPlus, for older policy transactions where policy day is unavailable, only policy month and year is displayed	In IBC DASH, for older policy transaction where policy day is unavailable, IBC uses a policy day default value of "01" with the reported policy month and year.
Years of Continuous Insurance	<p>CGI AutoPlus years of continuous insurance is based on policy level information.</p> <p>IBC DASH years of continuous insurance is based on individual driver level information.</p>	CGI AutoPlus uses calculated policy coverage periods to present years of continuous insurance.	<p>For each driver, IBC DASH calculates the Years of Continuous Insurance as an uninterrupted (no gaps) number of full years where the driver was insured as any kind of operator (except "excluded operator"), up to the report date.</p> <p>The calculation is based on all available ASP/UIP and DASH Supplementary data.</p>
Policy Number	<p>The Policy Number format between IBC DASH and CGI AutoPlus could be different.</p> <p>IBC DASH presents ASP reported Policy Numbers.</p> <p>CGI AutoPlus presents "masked" Policy Numbers based on ASP reported Policy Numbers and Insurer direction.</p>	<p>Policy numbers in CGI AutoPlus have undergone a masking process (CGI IP). Masking was applied because at insurer end, the transactions for a particular policy might be shared using different policy number formats. This can be either because of system change or because of the data extraction from different system (e.g. Policy vs claims).</p> <p>Prior to Aug 2018, the CGI Autoplus report extract (including UIP Seed Data) included masked Policy Numbers; after Aug 2018, the Policy Number provided were consistent with the ASP reported Policy Number.</p>	IBC DASH uses the Policy Identification field reported in the ASP/UIP data.
Policy Status	<p>Both DASH and AutoPlus are using derived fields to determine policy status (cancellation for non-payment), returning different values.</p> <p>Policy status, specifically cancellation for non-payment, is a policy level legal classification.</p>	CGI's Policy Status is a policy-level data element that is derived from the individual reported vehicle status, this includes logic based on policy premium (reported premiums must be cancelled) and total policy cancellation (all vehicles must be cancelled).	IBC DASH determines the policy status based on the ASP/UIP Policy Vehicle Status data element. Since the policy status can change over a lifetime of the policy (active, cancelled, reinstated, etc.), IBC DASH uses the status reported in the latest premium transaction record to determine the current policy status.

Item	Summary	CGI AutoPlus Report	IBC DASH Report
List of Policies	<p>The listing of policies between IBC DASH and CGI AutoPlus has differences.</p> <p>CGI AutoPlus lists policies that have the same policy effective date/month and cancellation date/month.</p> <p>IBC DASH does not displays policies that have the same policy effective date and cancellation date.</p>	<p>CGI AutoPlus includes policies that have the same policy effective date/month and cancellation date/months.</p>	<p>IBC DASH does not include the policies that were cancelled on the same day they came in effect. These policies are deemed to have never been in effect.</p> <p>IBC DASH currently does not display policies that have more than 20 operators OR more than 20 vehicles listed.</p>
List of Policy Operators	<p>The listing of policy operators between IBC DASH and CGI AutoPlus has differences.</p> <p>CGI AutoPlus lists drivers with blank Driver License Numbers while IBC DASH does not.</p> <p>For non-commercial policies, CGI AutoPlus lists all operators across latest/current policy terms.</p> <p>IBC DASH shows all operators that were listed on the policy in the latest term in which the inquired driver was listed on the policy.</p>	<p>CGI AutoPlus lists drivers with blank Driver License Numbers.</p> <p>For non-commercial policies, CGI AutoPlus includes all operators listed on the policy across latest/current policy terms.</p> <p>For commercial policies, CGI AutoPlus displays only the information pertaining to the inquired driver.</p> <p>CGI AutoPlus includes operators reported in the supplementary data.</p>	<p>For each non-commercial policy, IBC DASH shows all operators that were listed on the policy in the latest term in which the inquired driver was listed on the policy. This is based on all available ASP/UIP and DASH Supplementary data.</p> <p>For each commercial policy, IBC DASH shows only the inquired driver.</p> <p>IBC DASH will mask the DLNs/names of additional operators in the policy if they were reported with a non-unique (placeholder) DLN.</p>
Driver Alberta Grid Level	<p>CGI AutoPlus displays Alberta Grid level at policy and individual operator level.</p> <p>IBC DASH displays Alberta Grid Level at a profile level and only when the Driver License Number jurisdiction is in Alberta</p>	<p>CGI AutoPlus displays Alberta Grid Level at policy and individual operator level.</p>	<p>IBC DASH displays Alberta Grid Level at a profile level and only when the Driver License Number is an Alberta Driver License Number.</p>
List of Vehicles	<p>The listing of vehicles between IBC DASH and CGI AutoPlus has differences.</p> <p>CGI AutoPlus only includes vehicles that are in the current/last term of the policy.</p> <p>IBC DASH shows all vehicles that were listed on the policy in the latest term when the inquired driver was listed on the policy.</p>	<p>CGI AutoPlus does not always include VINs belonging to commercial policies - only vehicles where the inquired driver is the principal operator are shown for commercial or possible commercial policies.</p> <p>CGI AutoPlus only includes vehicles that are in the current/last term of the policy.</p>	<p>IBC DASH shows all vehicles that were listed on the policy in the latest term when the inquired driver was listed on the policy.</p> <p>This is based on all available ASP/UIP data.</p>

Item	Summary	CGI AutoPlus Report	IBC DASH Report
List of Claims	<p>The listing of claims between IBC DASH and CGI AutoPlus has differences.</p> <p>CGI AutoPlus displays claims at a policy level while they are displayed at a driver level in DASH.</p>	<p>CGI AutoPlus displays claims based on policy number and date of loss.</p> <p>CGI AutoPlus expects the first transaction for a UIP/ASP reported claim to be a financial transaction (UITS Transaction Type = 9). CGI AutoPlus includes claims (zero-dollar claims) reported through the supplementary feed.</p> <p>CGI AutoPlus removes claims greater than 25 years unless there are still active transactions within the last 25 years, this is requested by FA as per FA's record retention policy</p>	<p>IBC DASH displays the following claims for the inquired driver:</p> <ul style="list-style-type: none"> • All claims where the inquired driver was the first party in the claim • All claims where the inquired driver was the third party in the claim • All other claims (where the inquired driver was not FP or TP) submitted under the policy(s) (excluding the commercial policies) on which the inquired driver was listed as of the accident date <p>IBC DASH does not display pre-2000 claims (as per FA's required record retention policy, IBC must remove claims greater than 25 years unless there are still active transactions within the last 25 years.)</p> <p>IBC DASH will collect the zero dollar claims from insurers through the DASH Supplementary data.</p>
Number of Claims (total, at-fault, comprehensive, DCPD)	<p>The number of claims between IBC DASH and CGI AutoPlus can be different.</p>	<p>CGI AutoPlus counts the number of claims using derived process (IP) based on ASP/UIP submissions.</p>	<p>IBC DASH considers the claims that have different Claim Identification to be separate claims.</p> <p>Claims that have no paid amounts, but only reserve amounts, are displayed in the IBC DASH report but not counted in any totals.</p> <ul style="list-style-type: none"> • When calculating the total number of claims, IBC DASH considers all claims where the inquired driver was the first party (FP) or the third party (TP), and also all claims where the inquired driver was not FP/TP, but were submitted under the policy(s) (excluding the commercial policies) on which the inquired driver was listed as of the accident date • When calculating the number of at-fault claims, IBC DASH considers the claims where the inquired driver was the first party, and the claims where the inquired driver was the third party if there are no corresponding (same Accident Date) claims where the inquired driver was the first party • When calculating the number of comprehensive claims, IBC DASH considers the claims that have ALL Kind of Loss codes within (21-29, 2A) • When calculating the number of DCPD claims, IBC DASH considers the claims that have ALL Kind of Loss codes within (12, 14, 16, 17, 18, 19)

Item	Summary	CGI AutoPlus Report	IBC DASH Report
Years Claims Free	<p>The years claims free between IBC DASH and CGI AutoPlus can be different.</p> <p>CGI AutoPlus calculates years claims free based on both at-fault and not-at-fault claims while DASH determines the years claims-free based on at-fault claims only.</p>	<p>CGI's converting process (IP) calculates claims free based on multiple ASP/UIP submissions over time, including not-at-fault claims.</p> <p>If the inquired driver had no claims at all, then their Years Claims Free value will be equal to the Years Insured on AutoPlus.</p>	<p>IBC DASH determines the Years Claims Free based on the claims reported in the ASP/UIP and the at-fault information in the claims. The Years Claims Free is calculated as the number of full years since the last at-fault claim where the inquired driver was either the first party or the third party.</p> <p>If the inquired driver had no claims at all, then their Years Claims Free value will be equal to the Years Licensed value.</p>
At fault Percentage	<p>CGI AutoPlus determines the First/Third Party At-Fault Percentage using a derived process</p> <p>IBC DASH determines the At-fault Percentages based on the latest reported First Party Degree At Fault and the Kind of Loss codes in the ASP/UIP data.</p>	<p>CGI AutoPlus's converting process (IP) calculates First/Third Party At-Fault Percentage based on multiple ASP/UIP submissions over time.</p>	<p>IBC DASH displays the First Party At-Fault Percentage based on the latest reported First Party Degree At Fault reported in the ASP/UIP claim data.</p> <p>The Third Party At-Fault Percentage is derived based on the First Party At-Fault Percentage and the Kind of Loss codes reported in the ASP/UIP</p>
Commercial Policy Definition	<p>The Commercial Policy definition between IBC DASH and CGI AutoPlus can be different.</p>	<p>CGI AutoPlus determines a Commercial Policy based on logic (IP) using Insured Name, Type of Business, Type of Use and supplementary data feeds.</p> <p>Commercial policies only display information pertaining to the inquired driver.</p>	<p>IBC DASH considers a policy to be commercial if there is at least one vehicle listed in the latest term that has a commercial Type of Use reported in the ASP/UIP data. (33-49, 51, 53, 54, 55, 57, 61, 62, 63, 64, 70-79, 7A, 7B, 7C, 7M, 7N, 81-89, 91, 92, 98, 99, T1, T2)</p>