## TABLE OF CONTENTS

FINANCIAL REPORTING PriceWaterhouseCoopers, Chapter 3, Liability for Income Tax.	A- 1 to A- 2
PriceWaterhouseCoopers, Chapter 4, Income for Tax Purposes.	A- 3 to A- 6
PriceWaterhouseCoopers, Chapter 5, Investment Income.	A- 7 to A- 13
PriceWaterhouseCoopers, Chapter 6, Reserves.  PriceWaterhouseCoopers, Chapter 11, Investment Income Tax.	A- 14 to A- 17 A- 18 to A- 19
PriceWaterhouseCoopers, Chapter 27, Provincial Premium Taxes.	A- 20 to A- 21
Lombardi, Chapter 1, Overview of Valuation Requirements.	A- 22 to A- 26
SN ILA-C100-07, Financial Reporting Developments: Accounting for Derivative Instruments and Hedging Activities, Overview and Appendix C.	A- 27 to A- 35
SN ILA-C102-09, Actuarial Review of Reserves and Related Annual Statement Assets and Liabilities.	A- 36 to A- 44
SN ILA-C127-11, Insurance Contracts, IASB, July 2010, (pages 19-84).	A-45 to A-52
SN ILA-C618-11, OSFI Guideline D-10, October 2009.	A- 53 to A- 54
SN ILA-C625-10, Market Value Margins for Insurance Liabilities in	
Financial Reporting and Solvency Applications, October 1, 2007, through page 65.	A- 55 to A- 62
SN ILA-C629-11, Conversion to IFRS by Federally Regulated Entities, March 2010.	A- 63 to A- 66
SN ILA-C630-11, IFRS & the Canadian Actuary, Session PD-6 from	
Proceedings of the CIA, Vol. 20, September 2009.	A- 67 to A- 69
An Approach to Fair Valuation of Insurance Liabilities Using the Firm's Cost of Capital, NAAJ, April 2002, pages 18-23.	A-70 to A-73
Fair Value of Liabilities: The Financial Economics Perspective, NAAJ, January 2002.	A-74 to A-78
CIA: CALM Implications of AcSB Section CICA 3855 Financial	
Instruments – Recognition and Measurement, June 2006.	A- 79 to A- 84
CIA: Implications of CICA Accounting Standards 3855 and 1530, January 2007.	A- 85 to A- 87
CIA: Classification of Contracts under IFRS, June 2009.	A-88 to A-89
CIA: Changes in Accounting Policies under IFRS.	A-90 to A-92

PRINCIPLES OF VALUATION Lombardi, Chapter 1, Overview of Valuation Requirements (ref. Sect. A).	A- 22 to A- 26
CIA CSOP, Sections 2100, 2300, 2500, December 2009.	B- 1 to B- 23
CIA: Best Estimate Assumptions for Expenses, November 2006.	B- 24 to B- 33
CIA: Margins for Adverse Deviations, November 2006.	B- 34 to B- 40
CIA: Valuation of Segregated Fund Investment Guarantees, December 2003.	B- 41 to B- 41
CIA: Valuation of Segregated Fund Investment Guarantees (Revised), October 2005.	B- 42 to B- 42
CIA: Approximations to the CALM, November 2006.	B- 43 to B- 45
CIA: Expected Mortality: Fully Underwritten Canadian Individual Life Insurance Policies, July 2002.	B- 46 to B- 57
CIA: Use of Stochastic Techniques to Value Actuarial Liabilities Under Canadian GAAP, August 2001.	B- 58 to B- 66
CIA Task Force on Segregated Fund Investment Guarantees, March 2002, Chapters 1-5.	B- 67 to B- 76
CIA: Dynamic Capital Adequacy Testing, November 2007.	B- 77 to B- 90
CIA: Valuation of Universal Life Policy Liabilities, December 2006.	B- 91 to B- 98
CIA: Use of Actuarial Judgment in Setting Assumptions and Margins For Adverse Deviations, November 2006.	B- 99 to B-103
CIA: Considerations in the Valuation of Segregated Fund Products, November 2007.	B- 104 to B- 107
Fair Value Accounting: Trouble-Maker or Life-Saver?, April 2009.	B- 108 to B- 108
An Approach for Measurement of the Fair Value of Insurance Contracts, May 2007.	B- 109 to B- 111
CIA: Currency Risk in the Valuation of Policy Liabilities for Life and Health Insurers, December 2009.	B- 112 to B- 112
REINSURANCE	
PriceWaterhouseCoopers, Chapter 30, Reinsurance	C- 1 to C- 4
Tillers, Chapter 4, Basic Methods of Reinsurance. Tillers, Chapter 5, Advanced Methods of Reinsurance.	C- 5 to C- 14 C- 15 to C- 25

Tillers, Chapter 6, The Reinsurance Treaty.	C- 26 to C- 32
SN ILA-C624-10, Discussion Paper on OSFI's Regulatory and Supervisory Approach to Reinsurance, December 2008.	C- 33 to C- 35
Report of the CIA Task Force on the Appropriate Treatment of Reinsurance, October 2007.	C- 36 to C- 40
Submission by the CIA to OSFI on Approach to Reinsurance, March 2009.	C- 41 to C- 42
FINANCIAL AND CAPITAL MANAGEMENT Atkinson-Dallas, Chapter 16, Financial Management.	D- 1 to D-17
SN ILA-C106-07, Toole-Herget, Chapter 4, Valuation Techniques, Sections 4.1-4.6.	D- 18 to D- 26
SN ILA-C107-07, Securitization of Life Insurance Assets and Liabilities.	D- 27 to D- 31
SN ILA-C110-07, The Economics of Insurance: How Insurers Create Value for Shareholders, Swiss Re.	D- 32 to D- 42
SN ILA-C603-07, OSFI Guideline D-9: Sources of Earnings Disclosure.	D-43 to D-45
SN ILA-C626-10, PD #28 – Embedded Value (EV) and Market-Consistent Embedded Value (MCEV). What is the Difference?, June 2008.	D- 46 to D- 48
CIA: Sources of Earnings: Determination and Disclosure, August 2004.	D-49 to D-52
Embedded Value: Practice and Theory, SOA, March 2009.	D- 53 to D- 56
Strategic Management of Life Insurance Company Surplus, TSA XXXVIII, pages 105-116.	D- 57 to D- 63
FINANCIAL AND CAPITAL MANAGEMENT Lombardi, Chapter 1, Overview of Valuation Requirements (ref. Sec A). Lombardi, Chapter 16, Risk-Based Capital.	A- 22 to A- 26 E- 1 to E- 6
SN ILA-C121-08, Economic Capital Modeling: Practical Considerations.	E- 7 to E-13
SN ILA-C606-11, OSFI Guideline: MCCSR for Life Insurance Companies, Chapters 1-5 & 8, December 2009.	E- 14 to E- 46
SN ILA-C609-07, CIA Response to OSFI Submission: Future Direction of Insurance Capital Rules, March 2005.	E- 47 to E- 47
SN ILA-C627-10, PD #9, Economic Capital Models, June 2008.	E-48 to E-49

SN ILA-C628-10, OSFI: Framework for A New Standard Approach to Setting Capital Requirements, November 2008.	E- 50	to E- 52
SN ILA-C631-11, Key Principles for the Future Direction of the Canadian Regulatory Capital Framework on Insurance.	E- 53	to E- 54
Economic Capital for Life Insurance Companies, Chapters 1, 3, 4, 5, 6.	E- 55	to E-63
Economic Capital: The Controversy at the Water Cooler.	E- 64	to E-66
A Multi-Stakeholder Approach to Capital Adequacy.	E- 67	to E-70
Transitioning to RBC C3 Phase III, March 2010	E- 71	to E-72
MODEL OFFICE AND ASSET/LIABILITY MODELING		
Atkinson-Dallas, Chapter 14, Financial Modeling.	F- 1	to F- 12
Atkinson-Dallas, Chapter 15, Stochastic Modeling, exclude 15.7.	F- 13	to F- 20
Lombardi, Chapter 13, Cash Flow Testing.	F- 21	to F- 26
SN ILA-C112-07, Asset Liability Management for Insurers.	F- 27	to F-33
SN ILA-C113-07, Chapter 22 of Life Insurance Accounting, Asset Liability Management.	F- 34	to F- 42
SN ILA-C114-07, Life Insurance Forecasting and Liability Models.	F- 43	to F-48
ASOP #23: Data Quality.	F- 49	to F- 51
RISK MANAGEMENT AND MITIGATION		
SN ILA-C116-07, Mapping of Life Insurance Risks.	G- 1	to G- 3
SN ILA-C124-10, S&P's Insurance Criteria: Refining the Focus of Insurer ERM Criteria, June 2006, exclude pages 20-26.	G- 4	to G- 8
SN ILA-C125-10, Insurance Risk Management Response to the Financial Crisis, CRO Forum, April 2009	G- 9	to G- 9
ERM Specialty Guide, May 2006, Chapters 1-6.	G- 10	to G- 22
Stochastic Analysis of Long Term Multiple-Decrement Contracts.	G- 23	to G-26
Stochastic Amarysis of Long Term Multiple-Detrement Contracts.	U- 23	10 O-20

## **PROFESSIONAL CONSIDERATIONS**

SN ILA-C119-07, Chapter 19 of Life and A&H Insurance Accounting, Management Reports and Reports to Regulatory Bodies.	H- 1	to H- 17
SN ILA-C126-10, SEC Guidance on Internal Control Over Financial Reporting.	H- 18	to H-19
SN ILA-C620-09, OSFI Guideline E-15: Appointed Actuary: Legal Requirements, Qualifications and External Review, November 2006.	H- 20	to H-23
SN ILA-C622-10, CIA CSOP, Section 2400, February 2009.	H- 24	to H-25
Actuarial Aspects of SOX 404, December 2004.	H- 26	to H- 29
Responsibilities of the Actuary for Communicating SOX Control: Effectiveness in Accordance with Actuarial Standards of Practice.	H- 30	to H-31
REVIEW QUESTIONS	Q- 1	to Q-85
SOLUTIONS TO REVIEW QUESTIONS	S- 1	to S-91

#### SN ILA-C625-10

# MARKET VALUE MARGINS FOR INSURANCE LIABILITIES IN FINANCIAL REPORTING AND SOLVENCY APPLICATIONS, OCTOBER 1, 2007 (THROUGH PAGE 65)

#### I. Executive Summary

#### A. Introduction

- 1. This report examines the cost of capital method in 2 specific contexts
  - a. Measuring the fair value of insurance liabilities for financial reporting purposes.
  - b. Establishing regulatory capital standards for insurers.
- B. Overview of the Cost of Capital Method Inputs required for the calculation
  - 1. Initial Capital Base.
  - 2. Capital Base in Each Subsequent Period Over the Lifetime of the Liability.
  - 3. Cost of Capital Rate per Period.

#### C. Major Findings

- 1. Key parameters used in the cost of capital methodology and in pricing practices should be reconcilable.
- 2. Pragmatic approaches to quantifying risk must be validated.
- 3. Cost of capital rate must be calibrated.

#### D. Implications

- 1. Financial reporting: Fair value estimates should at all times reflect current market environment with respect to assessment of risk and market price for transfer of this risk.
- 2. Solvency Applications: Same implications apply plus unique challenges.

#### E. Conclusions

- 1. Comparison and analysis of relationship of ultimate and one-year risk exposure horizons for insurance risk to capital standards in common use.
- 2. Review of common pricing methods currently in use.
- 3. Analysis of investor return expectations and underlying capitalization levels inherent in such expectations.
- 4. Review of existing literature on application of CAPM, the Fama-French 3-Factor Model and other means of establishing equity returns expected by investors.
- 5. Development of estimates of factors that may impact appropriate cost of capital rate.
- 6. Review of capital market transactions to determine implied cost of capital rate as well as potential change in this rate following a market shock or distress scenario.
- 7. Recognizing on-going debate over appropriateness of using entry prices for calibrating fair value estimates.

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A-56 SN ILA-C625-10

#### II. Introduction

#### A. Scope of Report

- 1. Establishing the fair value of insurance liabilities for financial reporting purposes.
- 2. Establishing regulatory capital standards for insurers.

#### B. Outline of Report

- 1. Role of risk margins for financial reporting applications.
- 2. Overview of cost of capital method.
- 3. Challenges that industry faces.
- 4. Importance of ability to properly calibrate risk margins.

#### C. Additional Considerations

- 1. Various issues regarding determination of cash flows to be included in liability estimates for financial reporting purposes.
- 2. Appropriateness of standardized rather than company-specific risk margins for financial reporting.
- 3. Procedure to ensure consistency between internal models and standard formulas.
- 4. Appropriateness of one-year solvency time horizon for setting total capital requirements on long-term insurance risks.
- 5. Components of capital requirements under certain proposed solvency frameworks.

#### III. Market Value Margins for Financial Reporting

#### A. Fair Value Financial Reporting Framework

- 1. 3 components of fair value of insurance liability
  - a. Best Estimate Liability (BEL).
  - b. Market Value Margin (MVM).
  - c. Profit Margin.
- 2. Separation of the BEL and the MVM
  - a. BEL may include portion of risk margin attributable to hedgeable risks.
  - b. MVM reflects only additional risk margin required for non-hedgeable risks.
- 3. Calculating the MVM for Financial Reporting Using the Cost of Capital Method
  - a. Determine Capital Base.
  - b. Determine Time Horizon for Capital Commitment.
  - c. Determine the Required Rate of Return on Capital per Period.

## IV. Initial Capital Base

- A. Link Between the Amount of Capital and the Annual Cost of Capital
  - 1. Amount of capital is linked to its cost as a rate per period.

For the same BEL a lower amount of capital held should be used along with a higher rate per period.

## B. Basis for Initial Capital Base

- 1. Regulatory Required Capital.
- 2. Rating Agency Target Capital.
- 3. Internal Capital Models: Challenges include
  - a. Implementation Requirements.
  - b. Validation.
  - c. Adjustments to the Annual Cost of Capital Rate.

#### C. Risk Exposure Horizon

- 1. Definition of Risk Exposure Horizon
  - a. Regulatory capital models: capital must cover ultimate liabilities.
  - b. Various existing and proposed frameworks: One-year horizon.
- 2. Ultimate Risk Exposure Horizon Example.
- 3. One-Year Risk Exposure Horizon Example.
- 4. 2 Alternative Perspectives on Risk Exposure Horizon
  - a. Ultimate risk perspective is that the party assuming risk must be adequately capitalized from inception.
  - b. One-year risk perspective assumes that capital can be raised sequentially to fund a series of one-year risks.
- 5. Determining Capital Base Using Ultimate Risk Exposure Horizon Effects through time
  - a. Exposure declines because number of lives declines.
  - b. Potential variability declines over time because of fewer periods left.
  - c. Impact of decreased variability is dampened by elimination of diversification benefits
  - d. Capital base reflects less discounting for time value of money.
- 6. Determining Capital Base Using One-Year Risk Exposure Horizon.
- Applying the Cost of Capital Method
  - a. Either perspective could be used mechanically to derive MVM.
  - b. Cost of capital rate per period must be adjusted to produce same MVM.
- 8. Comparison to Existing Pricing Practices
  - a. Market will provide only one fair value liability price point.
  - b. Many existing internal capital models use ultimate approach.
- D. Measuring Capital Base for Non-hedgeable Risks: More practical stress testing performed.
- E. Diversification Adjustments: Definition of reference entity is particularly important.

A-58 SN ILA-C625-10

- V. Time Horizon for Capital Commitment
  - A. Approximating the Capital Base Over Time
    - 1. P&C Product Applications
      - a. Capital Base Over Time Using Ultimate Risk Exposure Horizon
      - b. Ways to model the release of initial capital base over time
        - i. Proportional to Loss Reserve Release.
        - ii. Proportional to Establishment of Reserves.
        - iii. Implied by Rating Agency Capital Models.
      - c. Capital Base Over Time Using One-Year Risk Exposure Horizon
    - 2. Life and Annuity Product Applications: Risk measure is not simply proportional.
  - B. Impact of Diversification is a challenge.
- VI. Annual Cost of Capital
  - A. Basis for Establishing the Cost of Capital Rate
    - 1. Total Return vs. Spread
      - a. MVM has to provide for the spread over and above the risk free rate of return.
      - b. This quantity will be referred as the cost of capital rate.
    - 2. Return Requirements of Capital Providers
      - a. Applicability of Shareholder Based Models.
        - i. Risk Definition.
        - ii. Returns for Run-Off/Closed Block.
      - b. Role of Corporate Debt and the Weighted Average Cost of Capital.
      - c. Frictional Costs.
  - B. Impact of Corporate Income Taxes.
  - C. Calibration to Market Prices
    - 1. Calibration of Property Catastrophe Bond Spreads: Important observations
      - a. Implied cost of capital rate varies for each sample transaction.
      - b. Implied cost of capital rate changed significantly after the 2005 hurricane season.
      - c. Implied (post-Katrina) spreads are significantly in excess of placeholder rates now being used in certain solvency applications of the methodology.
    - 2. Observable rates are Blended Rates for Hedgeable and Non-hedgeable Risks.

#### VII. Considerations for Solvency Applications

- A. Capital Standards for Insurer Solvency
  - 1. Objective of capital standard is to ensure that, under distress scenario, company could restate its liabilities to their fair value and have positive balance in its capital account.
  - 2. To achieve objective, it is necessary to quantify
    - a. Current  $BEL = BEL_0$ .
    - b. Change in BEL = Solvency Capital Requirement for Non-Hedgeable Risks = SCR
      - i. It reflects potential change in BEL over a one-year time horizon.
      - ii.  $BEL_0 + SCR = BEL_1^{DS} = Distress scenario BEL.$
    - c. Current  $MVM = MVM_0$ .
    - d. Change in MVM such that  $MVM_0 + Change in MVM = MVM^{DS}_1$ .
    - e. Difference between MVM<sup>DS</sup><sub>1</sub> and MVM<sub>0</sub> reflects combined effect of
      - i. Market Price per Unit of Risk Changes.
      - ii. Perceived Risk Changes in a Distress Scenario.
      - iii. Passage of Time Implies Less Remaining Risk.
  - 3. Required Capital and the Change in Fair Value
    - a. Potential Change in Fair Value =  $FVL^{DS}_1 FVL_0 = \Delta BEL + \Delta MVM$ .
  - 4. Change in Net Assets.
- B. Implementation of Cost of Capital Method in Solvency Applications
  - 1. Risk Exposure Horizon Used to Estimate the Change in the BEL (one-year).
  - 2. Risk Exposure Horizon Used to Estimate the End of Period MVM
    - a. Even when MVM reflects ultimate risk exposure horizon, SCR must reflect one-year risk exposure horizon.
    - b. Care should be taken to ensure that approximation of future periods' capital base accurately reflects risks in each period.
  - 3. Appropriate Assumptions for Calculating the MVM in a Distress Scenario
    - a. Intent is to capture risk margin that would be appropriate after a distress event.
    - b. MVM must be conditional upon extreme change in BEL occurring during period.
  - 4. Appropriate Assumptions for Calculating the End of Period MVM.

A-60 SN ILA-C625-10

#### VIII. Benchmarking Results - Considerations

#### A. Using Entry Prices to Calibrate Exit Prices

- 1. Impact of Portfolio Effects and Diversification: Entry prices often reflect value of policy to individual insured.
- 2. Change in Valuation Over Time.
- 3. Exit prices are only meaningful when each of the following is true
  - a. They can be calculated consistently across different insurers and different products.
  - b. They can be calibrated against objective benchmarks reflecting actual prices at which risks associated with insurance liabilities are transferred in arms-length transactions.
  - c. They rely upon parameters and assumptions that can capture both the current market environment for financial reporting purposes and capture the potential future market environment in a distress scenario for solvency purposes.

## B. Availability and Granularity of Benchmark Prices - Options that can be considered

- 1. Primary or Reinsurance Market Premiums with following limitations
  - a. Diversity.
  - b. Transparency.
  - c. Aggregation of BEL and MVM.
  - d. Magnitude.
- 2. Loss Portfolio Transfers and Closed Block Transactions.
- 3. M&A Transaction Prices with following limitations
  - a. These transactions involve diversified portfolios of insurance risks.
  - b. A significant component of price paid reflects company's franchise value.

#### C. Challenges Associated with Capturing Current Market Conditions

- 1. Include Practicality and Usability.
- 2. Solvency context requires forward-looking assessment of market conditions.

#### IX. Appendix A: Percentile Method

#### A. Description

- 1. It uses underlying risk distribution to directly determine aggregate fair value of liability as specified percentile of distribution.
- 2. Subtracting BEL from amount allows determination of MVM.

#### B. Comparison to Cost of Capital Method

- 1. Cost of Capital Method Makes the Underlying Assumptions Explicit.
- 2. Percentile Method requires complete risk distributions.
- 3. Several challenging aspects of the Cost of Capital Method are still relevant.
- 4. Calibration and Validation Challenges are not resolved.

#### X. Appendix B: Introduction to Cost of Capital Method – P&C Liability Application

- A. Results depend entirely upon 3 key elements
  - 1. Amount of initial capital base.
  - 2. Time horizon over which that capital must be committed.
  - 3. Required rate of return on capital per period.

#### XI. Appendix C: SPDA Example

- A. Risk in this product is driven by following components
  - 1. Crediting Rate Guarantees.
  - 2. Lapse Rate Variability.
  - 3. Investment Strategy.
- B. Risk Modeling Assumptions
  - 1. Product annuitization exercisable 10 years from inception.
  - 2. In-force of 1,000 policyholders with initial balance of 100,000.
  - 3. Crediting rate = reference rate fixed spread, subject to guaranteed minimum.
  - 4. Lapse rate = base rate + dynamic lapse rate + random lapse rate.
  - 5. No mortality within 10 years.
  - 6. No surrender charges.
  - 7. Expenses are .25% of account value.
  - 8. Stochastic Rate Model.
- C. Calculation of BEL using methods to price interest rate derivative securities.
- D. Calculation of the Capital Base for Non-Hedgeable Risks
  - 1. Full Stochastic Simulation and the Double-Counting of Risk.
  - 2. Using the Forward Rate Path.
  - 3. Adverse Rate Path.
  - 4. Lapse Rate Shock Scenarios.
- E. Comparison of MVM Calculations.
- XII. Appendix D: P&C General Liability Risk
  - A. Assumptions.
  - B. BEL = PV of expected claim payments.
  - C. MVM for Financial Reporting
    - 1. Ultimate Risk Exposure Horizon: Assumes portfolio is assessed on a stand-alone basis.
    - 2. One-Year Risk Exposure Horizon.
  - D. MVM for Solvency Applications.

A-62 SN ILA-C625-10

## XIII. Appendix E: Approximating the Capital Base Over Time

A. To demonstrate potential inaccuracy of approximating capital base in future periods using a one-year risk exposure horizon and applying a constant ratio to reserve balances.

- B. Commercial auto liability data.
- C. Estimated Reserves and Their Variability.
- D. Best Estimate Loss Reserve Variability Over "One Year".
- E. Relationship Between the Sequence of One-Year Variability Measures.
- F. Relationship Between the Sequence of Capital Measures.
- G. Other Lines of Business.

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## Source: Lombardi, Chapter 16, Risk-based Capital

## **Question 1**

(6 Points)

(a) What is the RBC Ratio of a company that has the following characteristics?

Dividend liability = 10M

Capital = 1500M

Asset Valuation Reserve = 125M

 $C_0 = 50M$ 

 $C_{1a} = 100M$ 

 $C_{1cs} = 300M$ 

 $C_2 = 600M$ 

 $C_{3a} = 100M$ 

 $C_4 = 50M$ 

REVIEW SOLUTIONS S-49

# Source: Lombardi, Chapter 16, Risk-based Capital

# **Solution to Question 1**

(6 Points)

<u>Statement</u>	<b>Points</b>
(a) Calculation of RBC Ratio	<u>6</u>
1. RBC Ratio = Total adjusted capital Authorized control level RBC resulting from formula	1
2. Total adjusted capital = Capital + Asset Valuation Reserve + 50% x Dividend liability	1
3. Authorized control level RBC = $C_0 + C_4 + \sqrt{(C_{1a} + C_{3a})^2 + C_{1cs}^2 + C_2^2}$	1
4. Total adjusted capital = $1500M + 125M + 50\% \times 10M = 1630M$ .	1
5. Authorized control level RBC = $50M + 50M + \sqrt{(100M + 100M)^2 + 300M^2 + 600M^2}$	
$= 100M + \sqrt{(100M + 100M)^2 + 300M^2 + 600M^2}$	
$= 100M + \sqrt{40\ 000M^2 + 90\ 000M^2 + 360\ 000M^2}$	
= 100M + 700M = 800M	1
6. RBC Ratio = 1 630M / 800M = 203.75%.	1
TOTAL POINTS	<u>6</u>

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