

Approach



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Proposed Guidance: Chapter 4 - Automobile Insurance Filing Guidance

Introduction

This Chapter communicates FSRA’s approach to receiving, reviewing and making decisions on applications for automobile insurance rates, risk classification and underwriting changes (“Automobile Insurance Filings”), which also includes fees, forms and endorsements. It sets out the principles that FSRA will adhere to in reviewing Automobile Insurance Filings and outlines the processes governing their submission.

This Chapter is intended to transition automobile insurance rating and underwriting filing processes, as well as non-standard form approvals, to outcomes-focused, principles-based and risk-based regulation. It streamlines processes and ensures that FSRA has the information needed to assess insurer delivery of Fair Consumer Outcomes and eligibility for accreditation. This Chapter is complemented by the Automobile Insurance Rating and Underwriting Filing Manual (“Filing Manual”), which provides further detail regarding the preparation and submission of Automobile Insurance Filings by insurers.

Application of this Guidance

This Approach Guidance applies to insurers writing all types of automobile insurance in Ontario, regardless of accreditation status. For clarity, it applies to:

- insurers that are required to file Automobile Insurance Filings with FSRA under *AIRSA* 3. (1) and *Insurance Act* s. 238 (4.1) and 227; and
- lines of business (e.g., fleet and non-PPA) or types of filings that have been granted filing process exemptions under *Regulation 664* and *Insurance Act* s. 413 (2).

Please consult the Filing Manual for the types of filings that have been granted exemptions under *Regulation 664* and *Insurance Act* s. 413 (2). Requirements may vary for classes and categories that have been granted exemptions under *Insurance Act* s. 413 (2) as a result of accreditation and for exemptions granted under *Regulation 664*, including for fleet.

Filing Manual and Related Guidance

This Chapter should be read in conjunction with Chapters 1-3 of this Guidance, the Filing Manual, and the latest Annual Review Guidance. For clarity:

1. The Filing Manual supplements this Guidance with detailed filing specifications based on the purpose and complexity of various Automobile Insurance Filings and the Insurer's accreditation status. Insurers are required to submit filings in accordance with the latest version of the Filing Manual. FSRA will update the Filing Manual periodically based on market trends and emerging issues, and the alignment of sector practices with Fair Consumer Outcomes.
2. The Annual Review Guidance sets out FSRA's Benchmarks, including the loss trend benchmark, the target underwriting profit benchmark, and additional requirements or clarifications related to Automobile Insurance Filings. The Annual Review Guidance is updated twice annually based on available industry data. Insurers are required to submit filings in accordance with the latest version of the Annual Review Guidance.

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FSRA will exercise its regulatory authority with respect to the approval of Automobile Insurance Filings in a manner that is consistent with its statutory objects as set out in the *FSRA Act* and with a view to protecting the rights and interests of consumers. FSRA's review and communication with insurers respecting filing submissions will aim at:

1. delivering **Fair Consumer Outcomes** as specified in Chapter 1 of this Guidance;
2. promoting **transparency, accessibility, clarity and certainty** with respect to the criteria that FSRA will consider or request;
3. fostering a **competitive, innovative, strong and sustainable automobile insurance sector**;
4. using a **risk-based outcomes-focused approach** that prioritizes Fair Consumer Outcomes and sound OCG practices;
5. exercising **proportionality**, taking into consideration the purpose and complexity of the proposed filing and the potential consequences for the insurers and consumers alike; and
6. adhering to a **practical** approach that emphasizes substance over form when determining if the criteria for an application's approval has been satisfied.

Process and practices

Filing streams

This Guidance establishes two filing streams, the Fast-track filing stream and Prior Approval filing stream.

- Fast-track: Insurers filing in this stream will be able to implement new rating changes in one business day.

- **Prior Approval:** Insurers filing in this stream will not be able to implement changes until formal approval is provided.

Insurers will have access to Fast-track and Prior Approval filing processes depending on the purpose and complexity of the proposed Automobile Insurance Filing and their accreditation status. Accredited insurers will have privileged access to additional Fast-track processes.

FSRA's review of Automobile Insurance Filings will consider the extent to which submitted filings are consistent with the expectations and requirements set out in this Guidance and the Filing Manual. If filings do not meet expectations, FSRA may use its discretionary authority to address identified issues and align automobile rating and underwriting practices with Fair Consumer Outcomes, including but not limited to requesting changes to filings going forwards, suspending insurers from using the Fast-track filing process, placing insurer accreditation status under review, or withdrawing accreditation.

For further details regarding Fast-track and Prior Approval filing processes as they relate to specific filing purposes and insurers' accreditation status, see the latest version of the Filing Manual.

Submitting filings

Insurers must submit filing applications to FSRA's Automobile Insurance Supervision team. For all further information regarding the submission of applications, please consult the latest version of the Filing Manual.

Meeting with FSRA

If insurers have questions about the Automobile Insurance Filing processes or requirements, they may contact their FSRA Automobile Insurance Rating and Underwriting Relationship Manager after having conducted appropriate internal due diligence.

Service standards

Please consult the latest version of the Filing Manual for details respecting service standards for various Automobile Insurance Filing purposes and streams.

Filing format and contents

All filings and contents are to be submitted in accordance with specifications set out in the Filing Manual. The Filing Manual contains further details for insurers preparing Automobile Insurance Filings, including details regarding the formatting, processes, general and specific content requirements, filing categories and required supporting documentation for given filing purposes.

Consult the Filing Manual for all requirements respecting contents, accreditation status, or specific filing processes and service standards.

Automobile Insurance Filings should comply with all relevant legal requirements, principles, and expectations set out in Chapters 1-4 of this Guidance, the latest Filing Manual and the latest Annual Review Guidance. All Automobile Insurance Filings must be accompanied by actuarial justifications. Insurers are expected to provide evidence of both quantitative and qualitative measures to support their filings. Insurers are expected to follow the Canadian Institute of Actuaries' Standards of Practice and ensure that all actuarial work is well-documented and supported by clear evidence, including peer review. Please consult the latest version of the Filing Manual for further information related to the demonstration of rate level indications, actuarial justifications for segmentation and modeling changes.

FSRA will focus on actuarial assumptions and methodologies that have the greatest impact on rate setting, such as loss development, trend analysis, and the use of credible data. Insurers have the flexibility to use internal and external data. FSRA will proactively monitor for areas of concern, such as excessive ultimate loss projections or inconsistencies in trend rate selections.

FSRA will seek assurances that the appropriate level of analysis and due diligence have been internally conducted on all representations made by insurers. FSRA may develop policy positions, or request policy and legal opinions regarding compliance to any applicable laws or other issues as they arise in the sector. FSRA will also conduct its own due diligence and reserves the right to request additional supporting information to evaluate whether desired outcomes are being achieved.

Effective date and future review

This Guidance became effective on **March 1, 2026**, and will be reviewed no later than **March 1, 2031**.

Retired Guidance

On the date this filing guidance becomes effective, the following filing guidelines are retired.

- Private Passenger Automobile Filing Guidelines – Major
- Private Passenger Automobile Filing Guidelines – Simplified
- Private Passenger Automobile Filing Guidelines – CLEAR Simplified
- Filing Guidelines for Proposed Revisions to Underwriting Rules & Rates for Endorsements
- Filing Guidelines for Automobile Insurance Forms
- Filing Guidelines for Automobile Insurance Manuals
- Technical Notes for Automobile Insurance Rate and Risk Classification Filings
- Automobile insurance non-standard forms, endorsements and certificates of insurance approval filing process
- AU0107ORG Other Than Private Passenger Automobile Filing Guidelines – Major
- AU0108ORG Other Than Private Passenger Automobile Filing Guidelines – Minor
- AU0109ORG Filing Guidelines for Underwriting Rules
- AU0110ORG Technical Notes for Underwriting Rules
- AU0126APP Standard Filing

- AU0108ORG Other than Private Passenger Automobile Filing Guidelines – Minor
- AU0111ORG Other Automobile Insurance Forms

About this Guidance

Chapters 1-4 of this Guidance are consistent with [FSRA's Guidance Framework](#). As Interpretation guidance, it describes FSRA's view of requirements under its legislative mandate (i.e. legislation, regulations and rules). As Approach guidance, it describes FSRA's internal principles, processes and practices for supervisory action and application of CEO discretion.