

Frequently Asked Questions (FAQs)

Attestation Filing for Rule 2024-002 – Total Cost Reporting

[Rule 2024–002 - Total Cost Reporting \(TCR Rule\)](#) took effect on January 1, 2026.

Below are the FAQs for the attestation filing process for insurers planning to use the missing historical data and/or legacy system exception.

1. How and where can I file the attestation(s)?

Effective May 4, 2026, please email attestation filings to TCR@fsrao.ca. In your email, please include the following:

- the type of exception in the subject line of the email: “Missing Historical Data Exception” or “Legacy System Exception”; and
- a summary list of the individual variable insurance contracts (IVICs) related to the filing and any other documents submitted.

You will receive an automated acknowledgement from FSRA in response once your filing has been successfully submitted.

2. When do the attestation(s) need to be filed?

The attestation(s) must be filed prior to the annual statements being sent to the customers.

3. How often do attestation(s) need to be filed?

FSRA expects attestations to be filed once before the first annual statement is sent to a customer in 2027. FSRA expects insurers to exercise judgement on

when an attestation needs to be re-filed, such as where an insurer identifies an error in the original attestation.

4. Do attestation(s) need to be filed for the event change exception?

No, attestation(s) only need to be filed for the missing historical data and legacy system exceptions.

5. What information must be included in the attestation(s)?

Please refer to section 3 and section 5 of the [Total Cost Reporting Rule](#) to see which information must be included as part of the attestation(s).

6. Is there a specific form that must be used for filing the attestation(s)?

No, the Rule does not prescribe a specific form, but insurers must ensure the attestation(s) contain all necessary information required by the Rule (question 5).

7. Will FSRA provide assurances that the material meets the attestation requirements under the TCR Rule?

FSRA will acknowledge receipt of the materials but otherwise expects insurers to exercise judgment with respect to whether, based on the specific facts and applicable laws/standards, an insurer has met the attestation requirements in the rule. FSRA may rely on the attestation and take a risk-based approach when determining supervisory actions, if needed. If FSRA determines through the course of any future regulatory activity that the material submitted is not complete, inaccurate or misleading, FSRA may consider taking action.

8. If I have a specific question regarding the attestation(s), who can I contact at FSRA?

Please direct questions to Contactcentre@fsrao.ca.

9. If the individual variable insurance contract (IVIC) stops being offered after January 1, 2026, can I use the legacy system exception?

No, the legacy system exception is only available for IVICs that are no longer issued or offered for sale as of January 1, 2026.