

Financial Regulator  
PO Box 9138  
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**Irish Brokers submission to the Financial Regulator on minimum competency requirements for Private Medical Insurance**

As the primary representative body of insurance intermediaries in Ireland the Irish Brokers Association welcomes the opportunity to make a submission in respect of the minimum competency requirements for Private Medical Insurance.

It is to be welcomed that consumers now have greater choice when it comes to the purchase of private medical insurance and that this product is also now available through the intermediary market. This is an important development as consumers can now obtain independent advice when purchasing health insurance and no longer have to depend on the direct marketing promotions of product producers.

The complexity of the market however cannot be understated. Although there are only three providers there a numerous plan types available for consumers which are differentiated not only on price but also product features. It is therefore necessary that professional advisors should have attained a minimum level of competency to advise consumers in respect of their health insurance needs.

The Association is aware that more of the members have started to offer advice to their clients with the recent entry of Hibernian Aviva to the market. Aware of this fact and to ensure that our members were in a position to offer appropriate advice to consumers we ran a series of accredited nationwide seminars on the subject using an independent private medical expert to ensure our members were knowledgeable with regard to the legislation pertaining to the health market and an understanding of the more popular product offerings from all the current providers. They were all well attended and as a result of the level of interest shown we are running more detailed workshops for members who are serious about getting more involved in the market.

The Irish Brokers Association agrees with the general points outlined in the consultation paper and that consumers should receive quality advice from appropriately trained professionals. The Association would recommend that non life practitioners a far more detailed module should be included in the CIP curriculum as it is inevitable that more and more brokers will become active in the Health Insurance market.

Please see below our views on the questions raised in the consultation paper.

**1. Do you think there are any special; considerations that should be taken into account in the case of individuals grandfathered for life assurance who wish to deal with private medical insurance? If so, what are they**

Those who are grandfathered in either life or non life have demonstrated that they have the relevant experience and expertise in their respective fields and have satisfied the Regulator in this regard. They must also keep themselves fully up to date with developments in the industry and legislation by undertaking continuous professional development.

The Association believes that given their experience in both the life and non life area grandfathered individuals should be able to advise on health insurance once suitably qualified to do so. They should be able to satisfy the Regulator that they have obtained a minimum level of competency in the area. We feel that grandfathers for both life and non life should be required to undertake a detailed e-learning module on MyCPD and then have to undertake a detailed on line test with a high pass rate to ensure they have the adequate competency to advise people with regard to their health insurance needs. They should also be required to complete a pre determined number of practical training hours on the subject to ensure they are up to date with developments in the private health insurance market. This training should form part of the formal CPD process on an annual basis.

**2. Do similar or other considerations apply in the case of individuals grandfathered for other forms of non-life insurance?**

No, as above.

**3. Should different criteria apply to grandfathering in relation to private medical insurance? If so, please set out the relevant criteria.**

No. We feel the current grandfather rules are more than adequate and have served the consumer well.

**4. What qualification do you think are appropriate for individuals**

- a. Grandfathered for life assurance**
- b. Grandfathered for other forms of non-life insurance**

**Who may wish to provide services in relation to private medical insurance?**

As mentioned earlier provided a grandfathered individual undertakes a specific accredited study module relating to health insurance only and undertakes the relevant CPD he/she should be licensed to advise customers in relation to health insurance.