

Subject: Dual Licensing, Specialized Licences and Administrators of Consumer Proposals

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While many trustees believe that the current licensing system is adequate to protect all stakeholders, the one tier education and licensing program for students has become out dated particularly in view of the growing number of consumer insolvencies versus corporate insolvencies. I am with a big four firm where we focus primarily on large CCAA, receivership files on behalf of secured creditors. Our students and professional team are primarily made up of chartered accountants who have chosen to specialize in corporate recovery and restructuring as their career. We do not attract chartered accountants wishing to specialize in consumer insolvencies as the pre-requisite training for a chartered accountant far out reaches the needs of a professional dealing with consumer insolvencies. On the other hand, we have senior administrative staff who have worked in the consumer insolvency area for many years who, I believe, would be excellent trustees specializing in consumer files but would fall short of qualifications to administer a CCAA, large corporate bankruptcy or receivership file. Given the decline in trustees in Canada over the past few years, the OSB needs to look at an education program that allows the candidate to choose which type of insolvency he or she wishes to administer as part of the NIQP. The big four firms will gradually withdraw from consumer files leaving those estates to be administered by proprietorships and small partnerships. How will a candidate hired by a small proprietorship receive the training on large corporate files which is currently required under our present licensing policy. I am opposed to the OSB licensing individuals to administer consumer proposals who have not completed the education program administered by CAIRP. An Administrator under a consumer proposal must be trained to identify and report on reviewable transactions as well as to understand the ramifications of a bankruptcy.