



March 19, 2021

The Honourable Peter Bethlenfalvy  
Minister of Finance and President of the Treasury Board  
Room 4320, 99 Wellesley Street West  
Toronto, ON M7A 1W3  
Via email: [Peter.Bethlenfalvy@Ontario.ca](mailto:Peter.Bethlenfalvy@Ontario.ca)

**Re: Ontario Digital ID Program and pension plans**

Dear Minister:

On behalf of the ACPM Ontario Regional Council (the “**ORC**”), I am writing to you to highlight the possible implications of the Digital ID Program for Ontario’s pension plans, and to encourage the government to work collaboratively with the sector through the ACPM to ensure that this important project is developed and implemented in a way that encompasses the needs of pension plans and their members.

ACPM is the leading advocate for Canadian plan sponsors and administrators in the pursuit of a balanced, effective and sustainable retirement income system in Canada. We represent plan sponsors, administrators, trustees and service providers. Our membership represents over 400 companies and retirement income plans that cover millions of plan members. The ORC represents plan sponsors and administrators with hundreds of plans registered, and millions of members reporting to work, in Ontario.

Pension plan administrators routinely use government-issued identification, including driver’s licenses, birth, marriage and/or death certificates, to verify the identity, age and status of plan members and other beneficiaries. The Digital ID Program therefore has the potential to affect administrators, employers and plan members across the province. With this in mind, we would be grateful to meet with officials to discuss further details of the Program as soon as possible and while they are still in development. Understanding details related to the initiative at the earliest possible opportunity will permit us, and our membership, to determine the impact of the Program on pension plans and their stakeholders, and to provide feedback in this regard.

We look forward to receiving more information about this exciting initiative, and to working with the government towards its successful implementation. In the meantime, please feel free to contact me on [danelle.parkinson@opb.ca](mailto:danelle.parkinson@opb.ca) or 647-278-9526 if you have any questions or would like to discuss this matter further.

Yours sincerely,

Danelle Parkinson  
Chair, Ontario Regional Council  
ACPM

Ric Marrero  
Chief Executive Officer  
ACPM