



ELECTRONIC COMMUNICATION — FEEDBACK FROM PLANS

MARCH 2026



Electronic Communication to Pension Plan Members

- The ability to issue required communications to plan members under the PBSA was added in 2010, subject to regulations that require a member’s active consent.
- ACPM has recommend that the PBSA regulations introduce deemed consent to permit electronic communications unless the member or former member specifically requests paper.

ACPMs Response

- Against this backdrop of evolving regulatory frameworks, ACPM conducted an online survey of federally-regulated pension plans to understand current practices and perspectives, for the purposes of informing ongoing policy discussions and future direction.
- The survey findings reinforce concerns previously raised by ACPM regarding the practical limitations of opt-in electronic consent and spousal communication requirements under the PBSA.

About this Survey



APPROACH

Online survey was developed and distributed to Federally-regulated pension plans across Canada. The survey was available in French and English. A total of 22 responses were received.



TIMING

Trustees were invited to participate between Feb 20 – Feb 27, 2026.

Survey results indicate that pension plans are largely operationally ready to move to electronic-by-default communications. Regulatory complexity (particularly around spousal consent) remains the primary constraint preventing broader, more consistent adoption.

- 1 Electronic communication is widely used, but not yet the default.**
 - Most plans surveyed use electronic channels (email, secure portals) to deliver required pension information, demonstrating readiness for an electronic-by-default framework. Paper delivery persists primarily due to existing legislative and regulatory constraints.
- 2 Digital infrastructure is largely in place, but maturity varies.**
 - Member portals commonly support core functions, including access to statements and plan information. Baseline security controls are widely implemented, while more advanced controls are less consistent, reflecting differences in portal maturity rather than a lack of secure digital infrastructure.
- 3 Retiree engagement is important.**
 - Inconsistently tracked retiree portal usage highlights the need for policy approaches that better enable electronic communications across all member groups, including retirees, through effective consent and enrolment frameworks.
- 4 Spousal consent requirements are the most significant barrier.**
 - Spousal consent requirements are the primary barrier to expanded electronic communications, as administrative complexity, incomplete data, and legislative uncertainty limit broader adoption despite secure systems being in place.
- 5 Regulatory clarity could unlock rapid progress.**
 - Most plans indicate they could expand electronic communications with a year, if legislation were modernized. These findings support ACPMs position to enable electronic communications as the default, with opt-out rights for paper delivery and appropriate safeguards, without diminishing member or spousal protections.

Overview of Results

Member Communication & Features of Member Portal



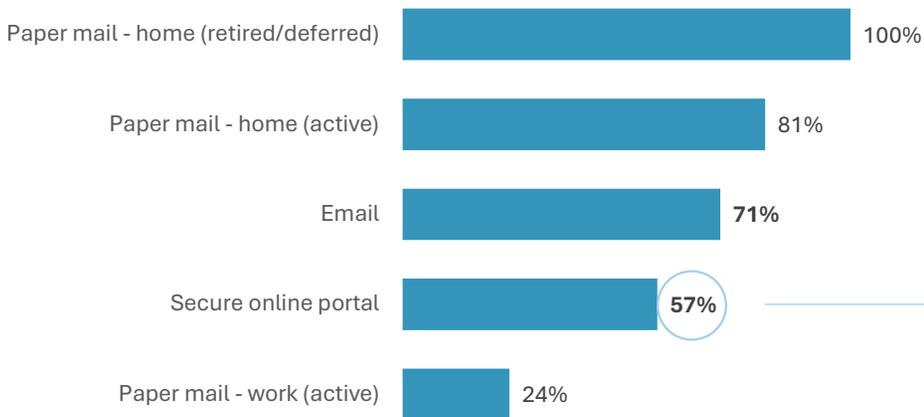
Methods of Communication to Plan Members

- Electronic communication channels, namely email and secure online portals, are widely used for the delivery of pension plan information to members.
- Paper-based delivery remains prevalent, alongside electronic methods.

Security Features for Member Portal

- Among plans with secure online portals, most report having security controls in place, including unique user credentials and session time-outs.
- More advanced controls such as multi-factor authentication, encryption and audit logging—are less consistently implemented across plans, indicating variation in portal maturity rather than an absence of secure digital infrastructure.

How do you typically communicate required plan information to members?



* Based on 21 respondents

Which of the following security features are in place for your member portal? Select all that apply.

Options	Total #	% of Total
Unique member login credentials	11	85%
Automatic session time-outs	11	85%
Multi-factor authentication	9	69%
Encrypted data transmission	6	46%
Audit logs or activity monitoring	6	46%
Access controls for sensitive transactions	4	31%

* Based on 13 respondents

Member Portal — Available Functions



Functionality of Member Portal

- Among those with member portals, access to member statements is universally available, making it the most consistently offered functionality.
- Most plans offer retirement or termination modelling tools (86%); many allow members to view or download plan documents and update personal information (79% each).
- While many plans allow the submission of forms or elections (71%) through the portal, fewer provide access to pay statement or tax slips, or messaging with the plan administration (64% each).

Which member functions are available through your member portal?

Select all that apply.

Options	Total #	% of Total
Access to statements	14	100%
Retirement or termination modelling tools	12	86%
Viewing or downloading plan documents	11	79%
Updating personal information	11	79%
Submission of forms or elections	10	71%
Access to pay statements or tax slips	9	64%
Secure messaging	9	64%
Other (please specify)	3	21%

* Based on 14 respondents



In their own words:

- *Note that we have several portals, depending on the plan. DB and DC have different portals and we are launching a new portal with the trustee. Not all functionality checked above applied to all portals.*
- *Updating personal information - only for inactive DB members; Retirement modelling - only for active DB members; Submission of forms or elections - only for active DC members; Access to pay statements and tax slips - available through employee portal (separate from plan member portal)*

Tracking Metrics on Portal Use

- Results show that a majority of plans with member portals monitor basic indicators of portal usage, such as registration & activation rates (57%) and login frequency (50%).
- Comprehensive tracking of member behaviour and outcomes is not widespread. Fewer plans monitor specific actions such documents views/downloads (36%), member inquiries through the portal (29%), or use of electronic forms or signatures (14%).
- A notable minority are not tracking portal-related metrics at all (21%).

Does your plan track any of the following portal-related metrics?¹ Select all that apply.

Options	Total #	% of Total
Member registration or activation rates	8	57%
Frequency of member logins	7	50%
Document views or downloads	5	36%
Member inquiries submitted through the portal	4	29%
Use of electronic forms or signatures	2	14%
Reduction in paper mailings	2	14%
None tracked	3	21%
Other (please specify)	4	29%

* Based on 14 respondents

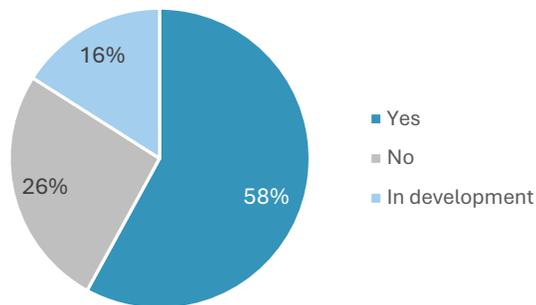
In their own words:

- *We receive ad hoc reports, but not automated reports to some of our portals.*
- *Pages visited, unique and total visits.*
- *Use of retirement modelling tools.*

Option to Elect Electronic Communication

- The majority (58%) of plans surveyed indicate that members have the option to elect electronic communications – an additional 16 percent are in the process of developing this capability.
- About a quarter (26%) of plans do not afford the members the opportunity to elect electronic communications.

Do members have the option to elect electronic communications rather than paper for some communications?



* Based on 19 respondents

Tracking Consent

- Where electronic communication elections are offered, consent is most commonly captured through digital online forms (67%) and to a lesser extent, email confirmation (33%).
- Few plans rely on automated enrolment or paper-based forms.

If members elect electronic communications, how do you record and track their consent? Select all that apply.

Options	Total #	% of Total
Online form (member portal)	8	67%
Email confirmation	4	33%
Members opt out of receiving electronic communications	2	17%
Paper form	1	8%
Other (please specify)	2	17%

* Based on 12 respondents

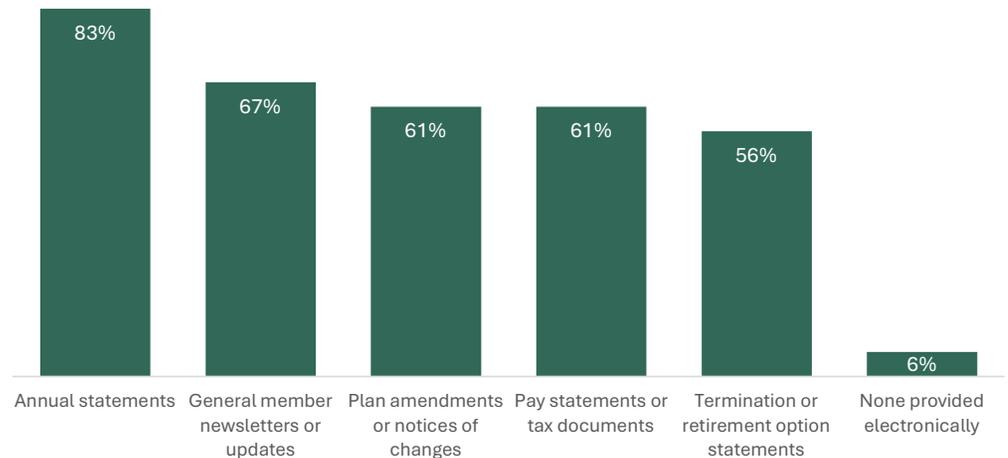
In their own words:

- *Online form available through general newsletters.*
- *Some communications are electronic only, no election made.*

Types of Plan Documents Provided Electronically

- Where electronic communication elections are offered, annual statements are the most common plan documents to be provided electronically (83%).
- A majority of these plans also report that their plans provide a range of documents electronically including general member updates (67%), plan amendments (61%), pay statement & tax documents (61%) and termination or retirement option statements (56%).

Which types of plan documents or notices do you also provide electronically. Select all that apply.



* Based on 12 respondents

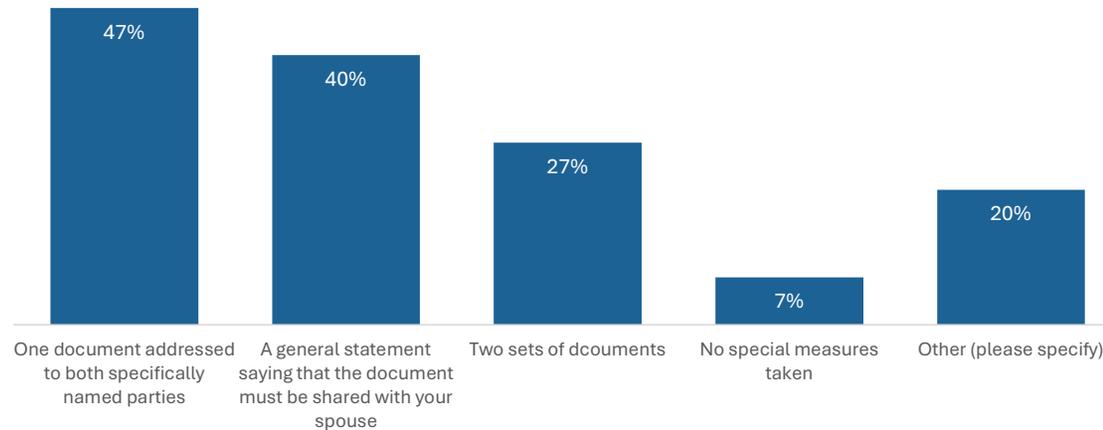
PBSA Requirements Spousal Communication

Meeting Requirements for Spousal Communication

- Findings show that most plans rely on indirect methods such as joint communication or general statements instructing members to share information with their spouse.
- Pension plans that provide two sets of documents incur extra cost and administration to comply with PBSA's requirements.

How does your plan satisfy PBSA's requirements to provide information to spouses?

(Check all that apply)



* Based on 15 respondents

In their own words:

- *DC plan: two sets of documents; DB plan: addressed to member (by name) and Spouse, e.g. Jake Smith and Spouse.*
- *The annual statement is addressed to both the member and spouse and it is mailed to them.*
- *Not a legislative requirement for our plan, except in case of relationship breakdown transactions.*

Barriers to Spousal Consent

- Administrative complexity is the top barrier for obtaining spousal consent – selected by about two-thirds of those surveyed.
- While above half (53%) identify inaccurate or incomplete spousal data as a barrier, just under half select each of lack of technological infrastructure (47%) and concerns about identity verification (40%).
- About a third (33%) view legislative uncertainty as a barrier, followed by member/spouse comfort level (27%)

These findings highlight a structural misalignment between current legislative requirements and the realities of digital communication systems, rather than a lack of willingness or capability on the part of plan administrators.

Q 13 What barriers prevent you from obtaining spousal consent? (Select all that apply)

Options	Total #	% of Total
Administrative complexity	10	67%
Inaccurate or incomplete spousal data	8	53%
Lack of technological infrastructure	7	47%
Concerns about identity verification	6	40%
Legislative uncertainty	5	33%
Member or spouse comfort level	4	27%
No barriers	1	7%
Other (please specify)	1	7%

* Based on 15 respondents

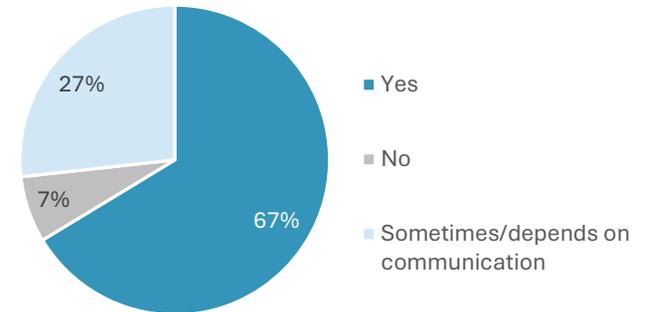
In their own words:

- *Not a legislative requirement to communicate with both member and spouse, and when we do it's because the spouse is the recipient of the transaction, and we can manage this with our system.*
- *Spousal information can be impossible to find. The spouses may not respond, and we may not have current contact information for them.*

Spousal Consent & the Expansion of Electronic Communication

- Spousal consent requirements are perceived as a barrier to the expansion of electronic communication, at least some of the time, most plans.

Do you view the requirement for spousal consent as a barrier to implementing or expanding electronic communications?

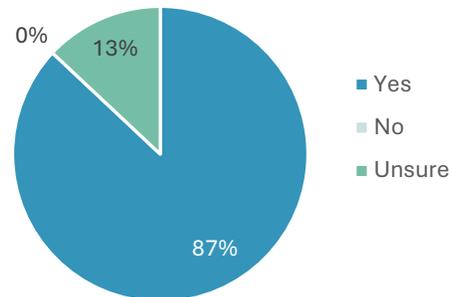


* Based on 15 respondents

Overall Readiness

- Results indicate a high level of readiness among plans to expand electronic member communications, if legislative or regulatory requirements were clarified or expanded.

Would your plan be able to implement electronic member communications more broadly if legislative or regulatory requirements were clarified or expanded?

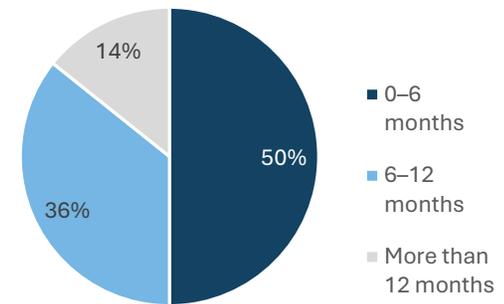


* Based on 15 respondents

Estimated Timeline to Implement

- The relatively short implementation timelines reported by respondents suggest that most plans could operationalize expanded electronic communications within the next year – half (50%) say it would take less than 6 months.

If yes, how long would implementation take?



* Based on 14 respondents

Additional Comments

Respondents were asked open-endedly to share any additional thoughts related to electronic communication or spousal consent.

Overview of themes:

- **Spousal consent requirements limit digital communication** – legislative requirements to address communications to both members and spouses prevent a full shift to electronic delivery.
- **Operational & data challenges** – plan administrators lacking contact information for spouses.
- **Technology & cost implications** – existing third-party portals do not fully support spousal communication requirements, resulting in ongoing administrative burden, system complexity and higher communication costs.

Q18 Please Share any comments on challenges, opportunities or best practices related to electronic communications or spousal consent.¹

- *It's very difficult to determine who the eligible spouse is. This is why we don't specifically ask for the consent from the spouse.*
- *It is very complicated to obtain spousal consent. Although we have a secure online portal where members can access their annual statements digitally, we are still required to mail a hard copy because it must be addressed to both the member and their spouse. If spousal consent were not required, we could eliminate the mailing of annual statements and rely solely on digital statements, resulting in significant cost savings.*
- *Requiring spousal communication impedes switch to 100% electronic communication for federally regulated plans as it adds additional complexity regarding spouse authentication.*
- *Meeting legislated spousal communication requirements is operationally difficult. Plan administrators typically do not have direct contact details for spouses and must rely on members to report marital status and changes, which can be incomplete or out of date. This creates uncertainty, particularly in situations involving separation, evolving common-law relationships, or privacy-sensitive circumstances.*
These requirements also significantly constrain the use of electronic communications. Obtaining and tracking spousal consent adds complexity and often forces continued paper delivery or duplicate processes, reducing efficiency and increasing cost. In addition, spouses generally cannot access employer or plan portals, limiting secure digital delivery options.
Overall, the current framework increases administrative burden and privacy risk while offering limited incremental benefit over an approach that allows spouses to access information upon request as is the case in other jurisdictions.
- *important que OSFI aide a rendre efficace la communication et agisse comme facilitateur.*

Several respondents noted that secure electronic delivery can reduce certain privacy risks associated with misdirected or intercepted paper mail.

¹Note - comments listed as written (no editing).

About Respondents

About Respondents



Plan Profile

The majority (61%) of respondents represent plans with more than 25,000 members, while about a quarter (26%) come from plans with fewer than 10,000 members.

How many members (active, deferred, and retired combined) does our plan have?

Options	Total #	% of total
0 – 1,000	0	0%
1,001–5,000	4	17%
5,001–10,000	2	9%
10,001–15,000	0	0%
15,001–25,000	3	13%
25,001+	14	61%

Policy Implications

Survey findings indicate that federally regulated pension plans are operationally ready to expand electronic communications.

Secure digital channels are already widely used, and most plans surveyed report they could implement broader electronic delivery within a relatively short timeframe if legislative or regulatory requirements were clarified or modernized.

Legislative design, rather than technological capability, is the primary constraint.

The current reliance on opt-in consent models—together with spousal consent and disclosure requirements—introduces administrative complexity, data challenges, and uncertainty that limit the effectiveness and consistency of electronic communications, even where secure systems are in place.

A modernized framework could enhance the effectiveness of statutory disclosures while preserving protections.

Enabling electronic communications as the default, paired with clear opt-out rights for paper delivery and appropriate safeguards, would support timely, accessible, and reliable delivery of required information without diminishing member protections.

Regulatory clarity would allow plans to move quickly and consistently.

The findings suggest that legislative clarification could translate directly into improved disclosure practices, reduced reliance on paper delivery, and more effective communication across all member groups, including retirees.