



The union for financial professionals.  
Le syndicat des professionnels de la finance.

**VIA EMAIL**

March 18, 2024

Ms. Carole Bidal  
Associate Assistant Deputy Minister  
Employee Relations and Total Compensation/TBS  
219 Laurier Ave  
Ottawa, ON K1A 0R5

Dear Ms. Bidal:

**Re: Policy Grievance (Pursuant to Section 220 of the FPSLRA)  
Comptrollership (CT) Collective Agreement – Expiry: November 6, 2026**

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The attached Policy Grievance is hereby submitted by the Association of Canadian Financial Officers.

As you know, on December 1, 2021, Treasury Board announced that the contract was awarded to Canada Life and that, effective July 1, 2023, Plan administration would move from Sunlife to Canada Life, promising a “seamless transition” between providers. The contract with Canada Life allowed for a grace period of six months in which Service Level Standards were not enforced. Almost immediately following the transition, members began experiencing significant issues, including, but not limited to:

- Lack of access to benefits;
- Arbitrary and erroneous denials of claims
- Interruptions in benefits, pending manual re-enrollment;
- An inability to reach an agent at Canada Life, or long delays in reaching an agent;
- Long delays in processing claims; and
- An increased administrative burden.

These issues continue to impact members to date. The situation has impacted members across the country. Members have experienced stress, aggravation, and pain and suffering by being subject to a Plan that is dysfunctional and not compliant. Some of these members have life threatening conditions requiring immediate treatment or care and were not able to avail themselves of benefits as they would have prior to the transition to a new Plan administrator. The Employer has failed to consider all elements of its decision and has disregarded the rights and ancillary effects that their decision has had on members in not ensuring a seamless uninterrupted transition to a new Plan administrator.

Please contact Scott Chamberlain, ACFO Director of Labour Relations ([schamberlain@acfo-acaf.com](mailto:schamberlain@acfo-acaf.com)) to schedule a final level grievance hearing at the earliest opportunity.

Sincerely,

Dany Richard, President  
Association of Canadian Financial Officers  
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Encl.

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## APPENDIX "A"

### Policy Grievance

This is a policy grievance hereby filed by the Association of Canadian Financial Officers ("ACFO") pursuant to Section 220 of the *Federal Public Sector Labour Relations Act*.

### Details of the grievance:

ACFO grieves the Employer's conduct, errors, omissions, and contraventions by:

- Failing to implement a functioning health care plan without due regard for the rights of members, as required by the incorporation of the *Public Service Health Care Plan Directive* under article 51 of the Comptrollership (CT) Collective Agreement.
- Causing adverse impacts to members on grounds protected by the *Canadian Human Rights Act* ("CHRA") and article 46 of the Comptrollership Collective Agreement (non-discrimination).

### Corrective Action:

ACFO is seeking the following:

- i) a declaration that the Employer has contravened the applicable provisions of the Comptrollership (CT) Collective Agreement (Expiry Nov. 6, 2026);
- ii) an order that the Employer compensate members for all harms experienced since the administration of the Plan was transferred to Canada Life, on the following terms:
  - a) General damages for all employees for stress, aggravation, and pain and suffering;
  - b) Damages for impacts to individuals who experienced financial losses;
  - c) Damages under the *CHRA* for adverse effects experienced on the basis of prohibited grounds;
- iii) to be made whole; and
- iv) other remedies deemed just in the circumstances.

**Dated at Ottawa this 18th day of March 2024**



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Scott Chamberlain, Director of Labour Relations  
Association of Canadian Financial Officers