

2024-08-26

Consumer Financial Protection Bureau Open Banking Standards Team Email: openbankingstandards@cfpb.gov

Dear CFPB Open Banking Standards Team,

Subject: Request for Recognition as a Standard Setter under the Personal Financial Data Rights Rule

I am writing to formally request that the Digital Governance Standards Institute be recognized as a standard setter under the Personal Financial Data Rights (PFDR) rule. In support of this request, please find below the required information, evidence, and explanations as outlined in the CFPB's application process:

1. Key Contact Information

Organization Name: Digital Governance Standards Institute Primary Contact Person: Darryl Kingston, Executive Director

Contact Email: dgc-cgn.org Contact Phone Number: 613-627-2466 x. 3

Organization Address: 500-1000 Innovation Drive, Ottawa, ON K2K 3E7 Canada

2. Evidence of Organizational Policies and Practices

Enclosed with this request, we have included comprehensive documentation illustrating our organization's policies and practices:

- Charter and Terms of Reference: Annex A
- Standards Setting Directives: Annex B
 - The Directives demonstrate the open, transparent, multi-stakeholder approach used to establish consensus-based standards. All standards and specifications developed are accessible and available to view and download at no charge on our corporate website.
- Council and Committees: Annex C
- Issued Standards: Annex D



3. Explanation of How Our Organization Meets the Requirements

The Digital Governance Council is a member-based, not-for-profit organization that works to provide confidence in the responsible design, architecture, and management of digital technologies. We do this by bringing together our members, facilitating the development of digital technology governance standards through the Council's Digital Governance Standards Institute with stakeholders, and ensuring their responsible use across organizations. The Digital Governance Standards Institute is committed to establishing and maintaining standards for open banking as an accredited standards body¹. It has accepted the WTO/TBT Annex 3 on Code of Good Practice for the Preparation, Adoption, and Application of Standards². The Standards Institute is also designated an ISO/IEC PAS Submitter to put forward its standards to ISO/IEC JTC 1 for transposition and publication by ISO/IEC given its open-by-design, transparent, consensus-driven standards development process and acceptance of its issued standards in the global market. Further, we believe our organization meets the requirements for recognition as a standard setter, as outlined in 12 CFR 1033.141 and as documented in our Standards Setting Directives. Specifically:

Openness: Our standards development process is designed to be inclusive and accessible. We ensure that all interested parties, including consumer and public interest groups, financial service organizations, community advocates, governments, trade associations, and academia have equal opportunity to participate. There is no charge to participate on any of our standards committees and the process is open-by-design for any stakeholder interested in participating to join a standards committee and provide input, including U.S, participants, data providers, data recipients, aggregators, and authorized third parties, allowing for meaningful and non-discriminatory participation.

Reference: Standards Setting Directives, subsections 4.4 and 4.7

• Balance: Decision-making power within our standards body is distributed equitably across all interested parties. We maintain meaningful representation for both large and small entities. No single interest dominates the decision-making process. We recognize that participants may have multiple roles and strive to balance their commercial interests to prevent any single interest from overwhelming others.

Reference: Standards Setting Directives, clause 4.4 b

¹ Accredited Organizations I Standards Council of Canada (scc-ccn.ca)

² <u>List of standardizing bodies (iso.org)</u>



• Due Process and Appeals: Our organization follows documented and publicly available³ policies and procedures for standards development. We provide adequate notice of meetings and allow sufficient time for reviewing drafts and submitting feedback. Our process ensures transparency in handling objections and conflicts, and an appeals process is in place to address procedural concerns impartially.

Reference: Standards Setting Directives, clause 4.13

 Consensus: We develop standards through a consensus-driven process, defined as general agreement rather than unanimity. Our approach ensures that all comments and objections are considered through fair, impartial, and transparent processes.

Reference: Standards Setting Directives, subsection 4.4, and clauses 4.7 a, 4.9 b and c

Transparency: All procedures and processes related to standards development are transparent and publicly accessible. This includes detailed documentation of how participants can engage and how standards are formulated. Further, all standards are published and available at no charge for organizations and consumers to access and download.

Reference: Standards Setting Directives, subsections 4.4, 4.7 and clause 4.8

4. Relationship to Open Banking

Our current and anticipated standards directly relate to open banking and are aligned to advance the PFDR rule and promote its core objectives. Here's how our standards support and enhance the implementation of the PFDR rule:

Safe, secure, and reliable digital interfaces for readily accessing financial data: Our standards specify requirements for planning, designing, developing, implementing, maintaining and improving the customer experience surrounding access to customer banking, transaction, and other financial data from bank and non-bank financial institutions. Requirements make personal financial data available without having consumers face friction in permitting third party access or undue pressure in providing or maintaining their consent. Further, our standards include provisions on data holders in providing personal financial data

³ Standards - Digital Governance Council (dgc-cgn.org)



in a clear and usable format to be transmitted to a designated data recipients without hindrance.

Issued Standards:

CAN/DGSI 110-1, Open Finance - Part 1: Customer Experience

Reference: Clauses 4 and 6.

DGSI 126, Baseline Requirements for Vendors Offering AI/ML Lifecycle

Solutions to Financial Institutions **Reference:** Clauses 4.1 and 4.3.

CAN/DGSI 100-4, Data Governance - Part 4: Scalable Remote Access

Infrastructure

Reference: Clauses 4 and 5

CAN/DGSI 100-9 - Data governance - Part 9: Data Collaboration Framework

Reference: Clauses 4.2 and 4.3

Anticipated Standards:

Digital Trust Registries

Security Payment Registries

Third party data access and sharing: Our standards specify minimum requirements for granting and controlling third-party access to data with an emphasis on security, availability, processing integrity, confidentiality and privacy. Further, our standards include provisions requiring organizations to ensure consumers clearly understand who has their data, what data is being shared, and how it is being used. This includes providing a standardized process for consumers to provide and revoke consent to share their data. This ensures that individuals have control over their data and can make informed decisions about sharing it with third parties. In addition, our standards include data portability requirements enabling consumers to transfer their data easily to designated recipients.

Issued Standards:

CAN/DGSI 110-1, Open Finance - Part 1: Customer Experience,

Reference: Clauses 4.1.4.1 d., and 5.3.1.1



CAN/DGSI 100-2, Data governance - Part 2: Third party access to data

Reference: Clause 4

CAN/DGSI 103-1, Digital trust and identity - Part 1: Fundamentals

Reference: Clauses 4, 7 and 8

DGSI/TS 115, Technical Specification for Digital Credentials and Digital Trust

Service

Reference: Clauses 6, 7, 8, 9, 10, 11 and 12

DGSI 126, Baseline Requirements for Vendors Offering AI/ML Lifecycle Solutions to Financial Institutions

Reference: Sub-clauses 4.4.4.1, 4.4.4.2, 4.4.4.3 and 4.4.4.4

Anticipated Standards:

CAN/DGSI 103-4, Digital trust and identity - Part 4: Digital wallets

CAN/DGSI 100-0, Data governance - Part 0: Techniques and code of practice

Common Data Models and Exchange Formats

Security Payment Registries

• Walk away from bad service: Our standards are designed to increase competitive forces by enabling consumers to easily transfer their data to new providers. Data portability provisions in our standards include requirements for data to transfer between institutions, ensuring that consumers can more readily move away from subpar services and products, thus fostering a more competitive and customer-centric financial environment.

Issued Standards:

CAN/DGSI 110-1, Open Finance – Part 1: Customer Experience, **Reference:** Clause 4.1.3.1, 4.1.5, 5.3, 6.1.3.4 and Section 6

Anticipated Standards:

Series of standards on user-centric consent-driven approach to data access, interoperability and mobility



Protecting Data from Misuse: Our standards impose strict requirements on third parties accessing consumer data to prevent unchecked surveillance and data misuse. Organizations accessing data are required to adhere to specific conditions, ensuring they do not exploit the information for their commercial gain. Provisions include requirements restricting data collection, usage, and retention solely to fulfill the individual's requested service, preventing unauthorized use of personal data for unrelated purposes.

Issued Standards:

CAN/DGSI 110-1, Open Finance - Part 1: Customer Experience,

Reference: Clauses 4.1.3.3 f., 4.1.4.1 c., 4.1.5.1 b, 5.2.3.7, 5.2.4.1, and

Subsection 5.3

DGSI 126, Baseline Requirements for Vendors Offering AI/ML Lifecycle Solutions to Financial Institutions

Reference: Clause 4.3 and 4.4.

CAN/DGSI 100-4, Data Governance – Part 4: Scalable Remote Access Infrastructure

Reference: Clauses 4 and 5

Anticipated Standards:

CAN/DGSI 100-0, Data governance - Part 0: Techniques and code of practice

Series of standards on user-centric consent-driven approach to data access, interoperability and mobility

Security Payment Registries

 Consumer Control: Our standards reinforce the PFDR rule's commitment to meaningful consumer control by including provisions wherein individuals can revoke access to their data at any time and withdraw authorization.

Issued Standards:

CAN/DGSI 110-1, Open Finance - Part 1: Customer Experience,

Reference: Subsection 4.1.3 and 5.3.2, and Clauses 4.1.5.1 b., 5.2.3.3, 5.2.3.4, 5.2.3.6, 5.2.4.2 and 5.3.1.1

Anticipated Standards:

CAN/DGSI 100-0, Data governance - Part 0: Techniques and code of practice



Series of standards on user-centric consent-driven approach to data access, interoperability and mobility

Reducing Risky Data Collection Practices: Our standards address the PFDR rule's move away from risky data collection practices such as screen scraping. Provisions promote safer methods for data access that do not require consumers to share sensitive login information, thereby enhancing data security and aligning with the rule's goals for safer data handling.

Issued Standards:

CAN/DGSI 103-1, Digital trust and identity - Part 1: Fundamentals

Reference: Clauses 4 and 8

CAN/DGSI 110-1, Open Finance - Part 1: Customer Experience,

Reference: Clauses 4, 5 and 6

DGSI 126, Baseline Requirements for Vendors Offering AI/ML Lifecycle

Solutions to Financial Institutions **Reference**: Clauses 4.3 and 4.4

CAN/DGSI 100-4, Data Governance – Part 4: Scalable Remote Access

Infrastructure

Reference: Clauses 4 and 5

CAN/DGSI 100-9 - Data governance - Part 9: Data Collaboration Framework

Reference: Clauses 4.2 and 4.3

Anticipated Standards:

CAN/DGSI 103-0, Digital Trust and Identity – Part 0: Techniques and codes of practice

CAN/DGSI 100-0, Data governance - Part 0: Techniques and code of practice

CAN/DGSI 100-11, Data governance – Part 11: Delivery of community and human services

Security Payment Registries



Supporting Fair and Inclusive Industry Standards: Our approach to standards development reflects the PFDR rule's emphasis on fair, open, and inclusive industry standards. We ensure that our standards are developed through a transparent and participatory process, allowing all relevant stakeholders—including consumer groups, financial institutions, and trade associations—to contribute meaningfully. Our organization has a Memorandum of Understanding (MOU) with the Financial Data Exchange (FDX) facilitating collaboration and active participation from FDX U.S. and Canadian members on the development of our standards. Additionally, technical committees responsible for the development of our standards comprise subject matter experts from across financial service organizations, government, consumer groups and technology vendors, including members of the Financial Data and Technology Association of North America.

Reference: Standards Setting Directives (see Annex B)
Standards Committees Membership List (see Annex E)

Thank you for considering our request for recognition. We look forward to your feedback and are eager to contribute to the advancement of open banking standards. Should you require any additional information or documentation, please do not hesitate to contact me.

Sincerely,

Keith Jansa Chief Executive Officer Digital Governance Council keith.jansa@dgc-cgn.org

Darryl Kingston
Executive Director
Digital Governance Standards Institute
darryl.kingston@dgc-cgn.org



Annex A - Charter and Terms of Reference

Annex B - Standards Setting Directives

Annex C - Council and Committees

Annex D - Issued Standards

Annex E - Standards Committee Membership List

DIGITAL GOVERNANCE COUNCIL

Charter and Terms of Reference





Table of Contents

erview1	ı
mise1	
pose1	
sion	
ue Model	
cutive Forum	
mbership2	,
cutive Committee3	,
visory Committee(s)	í

Overview

The Digital Governance Council is Canada's not-for-profit member-led organization that acts as a cross-sector neutral convener for Canada's executives to share best practices, identify digital governance issues and prioritize collective action. More specifically, the Council leads an Executive Forum for Council members, sets standards through the Digital Governance Standards Institute and certifies organization in the management of the effective and efficient use of digital technologies.

Promise

Build trust in Canada's digital economy.

Purpose

To strengthen the trust and confidence of Canadian people, business and government in Canada's digital economy.

Mission

To convene Canada's executives from across the public, private and non-profit sectors to collaboratively identify, prioritize and act on the critical digital governance challenges and opportunities facing Canadian people and organizations in the digital economy.

Value Model

The Digital Governance Council will deliver value to members as:

- 1. An executive forum for members to collaborate, share, explore, and learn from each other and from by invitation-only experts as they steer their organizations through significant digital transformations and work to address national digital governance gaps.
- 2. A neutral convenor bringing the public, private and non-profit sectors together to address our members' most urgent challenges, validate ideas and explore solutions to identified problems.
- 3. A partner with various organizations to access and direct funding public, private and in-kind for proving out technologies and delivering proofs of concept and common building blocks.
- 4. Canada's only accredited standards development body solely focused on digital technology and management through the Digital Governance Standards Institute.
- 5. A conformity assessment body certifying organizations and providing Canadians with confidence in the responsible design, architecture and management of digital technologies.

Executive Forum

The Digital Governance Council convenes an Executive Forum for Members to identify governance gaps, share best practices and prioritize action by:

- 1. Providing a neutral environment for Canadian executives to collaboratively identify and address Canada's critical digital governance challenges and opportunities.
- 2. Enabling executive peers and subject-matter experts to engage in dialogue and to learn from shared experiences, insights, innovations, and ideas; and
- 3. Advancing digital governance to inform, educate and provoke dialogue, innovation, and action.

The Executive Forum meets at minimum quarterly and is comprised of the Member Organizations. Executive Forum meetings constitute meetings of the Members. The first Executive Forum meeting in a new fiscal year shall serve as the Annual General Meeting.

Executive Forum meetings are jointly chaired by the Chair of the Digital Governance Council and the Chair of the Digital Governance Standards Institute.

Executive Forum meetings are held mainly in Toronto, with the provision to move to other cities as the agenda dictates. The Chief Executive Officer and chairs may invite third parties and/or guests to meetings, as required. Members may request topics for meetings and third parties and/or guests to the Chief Executive Officer. Members are responsible for their own travel and accommodation costs.

Members are entitled to receive notice of, attend and signal its support on priorities and initiatives at all meetings of the Members.

During the intervals between Executive Forum meetings the Executive Committee, and Policy and Advisory Committee(s) exercise their powers in guiding the management and direction of the affairs and business of Digital Governance Council in such a manner as they deem best for the interest of the Council.

Membership

Membership to the Council limited to organizations operating in Canada. Each Member Organization shall appoint an executive to represent the Member Organization at meetings of Council.

Members provide unbiased advice and direction to the Digital Governance Council based on their professional expertise and are expected to comply with Council policies and focus on the broader objectives of Digital Governance Council, including when attending Council and Executive Forum meetings.

The membership year is one year from the date the Member Organization joins the Council.

Unless otherwise determined by the Executive Committee, Membership participation fees of \$20,000 CAD plus applicable taxes are payable on an annual basis from the date the Member Organization joins the Council.

Members are entitled to participate in the Executive Forum, any Advisory Committees, and on the Standards Policy Committee of the Digital Governance Standards Institute. The Standards Policy Committee, chaired by the Digital Governance Standards Institute, governs the Institute's standardization policies, sets standardization priorities and is responsible for:

- 1. Coordinating standards development activities by establishing, dissolving, and assigning responsibility to technical committees, approving new technical work, and handling complaints of a procedural nature, by meeting or through correspondence.
- 2. Determining priorities, review cycles and the withdrawal of technical work.
- Maintaining the Institute's standards policies, procedures and other rules for the technical work.

Executive Committee

The Digital Governance Council and Digital Governance Standards Institute are chaired by a prominent business leader of the private sector and a public sector executive leader. The Chairs comprise the Executive Committee and are expected to act in the best interests of the Council and shall declare any potential conflict of interest.

The Executive Committee is responsible for appointing and advising a Chief Executive Officer and Executive Director, and delegates to them full power to manage and direct the business and affairs of Digital Governance Council and Digital Governance Standards Institute, and to employ and discharge agents and employees of the organization.

Either Chair of the Digital Governance Council or the Digital Governance Standards Institute may step down following a change in position or otherwise and advise the Chief Executive Officer on a future appointment. The Chief Executive Officer, in consultation with the presiding Chair, appoints a new Chair.

The Executive Committee is responsible for the approval of the Council Charter and Terms of Reference.

The Executive Committee meets as needed.

Advisory Committee(s)

Advisory Committee(s) are established by the Chief Executive Officer and comprise Members to provide advice and guide the direction and implementation of specific Digital Governance Council initiatives.

An "Advisory Committee" may be designated as either a "Steering Committee" or "Working Group", as suitable.



Digital Governance Standards Institute Standards Setting Directives

Approved: 2023-05-04

Editorial Revision: 2024-05-30

Table of Contents

1.	Scope	3
2.	Definitions	3
3.	Referenced Publications and Documents	3
4.	Organizational structure and resources	4
	4.1 Digital Governance Council	4
	4.2 Digital Governance Standards Institute	4
	4.3 DGSI Standards Policy Committee	4
	4.4 Technical Committees	5
	4.5 Operations	6
	4.6 Facilities and records management	7
	4.7 Developing standards	7
	4.8 Meetings	10
	4.9 Technical Committee Leadership	11
	4.10 Corrections	12
	4.11 Patents	13
	4.12 Conflict of Interest	13
	4.13 Complaints and Appeals	13
5.	DGSI Standards Drafting Directives	14
	5.1 Performance Based Standards	14
	5.2 Accreditation	14
	5.3 Trade	14
	5.4 Place of Origin	15
	5.5 Price Fixing	15
	5.6 Protection Against Misleading Standards	15
	5.7 Standards Drafting Requirements	15

Copies of DGSI policies and procedures are available to any interested parties and are readily available on the DGSI website - https://dgc-cgn.org/

1. Scope

The Digital Governance Standards Institute (DGSI) Standards Setting Directives specify the policies and procedures for the development, publication, and maintenance of DGSI standards.

The DGSI Standards Policy Committee approved the seventh edition of the DGSI Standards Setting Directives on 2023-05-04.

2. Definitions

For the purposes of this document, the following terms and definitions apply, including those given in Standards Council of Canada's Requirements & Guidance – Accreditation of Standards Development Organizations, and Requirements & Guidance – National Adoptions of International/Regional Standards and Other Deliverables.

3. Referenced Publications and Documents

The following referenced documents are indispensable for the application of the DGSI Standards Setting Directives. For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document applies.

- Digital Governance Council Charter and Terms of Reference
- DGSI Organizational Chart and Committee Governance
- DGSI Procedural Review Approval Template
- DGSI Standards Proposal Template
- DGSI National Standards Template
- International Classification for Standards
- ISO/IEC Directives, Part 2: Rules for the structure and drafting of International Standards
- Standards Council of Canada, Accreditation Services Accreditation Program Manual
- Standards Council of Canada, Canadian Standards Development Program Overview
- Standards Council of Canada, Standards Development Organization Accreditation Program – Program Overview
- Standards Council of Canada, Requirements & Guidance Accreditation

of Standards Development Organizations

 Standards Council of Canada Requirements & Guidance – National Adoptions of International/Regional Standards and Other Deliverables

4. Organizational structure and resources

4.1 Digital Governance Council

The Digital Governance Council works to provide Canadians with confidence in the responsible design, architecture and management of digital technologies through four streams of activity:

- Convening an executive forum for members to share best practices, identify digital governance gaps and prioritize collective action.
- Partnering to prove out new technologies and deliver proofs of concept and common building blocks to manage risks and opportunities associated with the use of digital technologies.
- Establishing the Council's Digital Governance Standards Institute, independent of the Council, to develop technology governance standards.
- Certifying organizations against digital governance standards.

4.2 Digital Governance Standards Institute

The Digital Governance Standards Institute develops digital technology governance standards fit for global use. The Institute works with experts, as well as national and global partners and the public to develop standards that reduce risk to communities, business and governments adopting and using innovative digital technologies in today's digital economy. The Institute is an independent division of the Digital Governance Council with no authorities nor direct responsibilities in Digital Governance Council certification activities.

4.3 DGSI Standards Policy Committee

The DGSI Standards Policy Committee, reporting to the DGSI Executive Director, governs standardization policies, sets standardization priorities and is responsible for:

 a. Coordinating standards development activities by establishing, dissolving, and assigning responsibility to technical committees, approving new technical work (considering Canadian interests), and interpretations of standard(s), and appointing technical committee leadership (i.e., chairs) as appropriate;

NOTE: Any stakeholder may nominate a chair to a technical committee. Nominations are directed to the DGSI Standards Policy Committee for selection and approval.

- b. Coordinating effective Canadian participation across national, regional, and international standards setting organizations within the limits of its resources in areas which it expects to develop or adopt standards;
- c. Determines priorities, review cycles (i.e., maintenance of standards; not to exceed five years from the date of publication) and withdrawal of particular items of technical work;
- d. Maintaining DGSI standards policies, procedures, and other rules for the technical work, and informing Standards Council of Canada on any changes; and
- e. Reviewing and approving DGSI standards conformity with Standards Council of Canada's Requirements & Guidance Accreditation of Standards Development Organizations, and if a national adoption, conformity with Standards Council of Canada's Requirements & Guidance National Adoptions of International/Regional Standards and Other Deliverables following technical approval by a technical committee and prior to its publication through a DGSI Standards Policy Committee secretariat appointed reviewer not engaged in the development of respective standard. The secretariat directs nonconformities to the relevant technical committee for resolution.

The chair of the Standards Institute shall chair the Standards Policy Committee. The size of the DGSI Standards Policy Committee may be restricted to a reasonable number of persons by the Chair.

For non-members of DGC, there is a fee as determined by the DGSI Executive Director to participate as a member of the DGSI Standards Policy Committee.

4.4 Technical Committees

DGSI standards development activities involve the formation of technical committees in accordance with Clause 4.3 (DGSI Standards Policy Committee), led by a committee chair, supported by a secretariat, comprised of subject matter experts, and having appropriate participation of Canadian experts.

Technical committees operate by consensus and provide an open forum offering:

- a. Equal access and participation by any interested party. Technical committees are not restricted in size and there is no fee to participate.
- b. Respect for diverse interests and identification of those who should be provided access to provide the needed balance of interests. Interests are grouped into the following categories:

- i. User;
- ii. Producer:
- iii. Government / Regulator; and
- iv. General Interest.

The sum of any one interest category shall equal less than the total sum of the other categories. The technical committee shall define each interest category specific to the technical activity and make it available upon request.

c. A mechanism for dispute resolution.

Technical committees shall be numbered in sequence in the order in which they are established, commencing at TC 1. If a technical committee is dissolved, its number shall not be allocated to another technical committee.

Technical committees are responsible for:

- Developing or reviewing and approving technical aspects of a standard or standards assigned to it, including requests to revise or amend existing standards. All decisions regarding technical aspects of a standard shall be by consensus. Consensus of the technical committee on the technical aspects of the standard is confirmed by ballot or recorded vote;
- Providing interpretations on the technical aspects of a standard for approval by the Standards Policy Committee;
- Reviewing standard(s) to ensure they are kept current; and
- Handling complaints of a technical nature.

4.5 Operations

The DGSI Executive Director is responsible for:

- a. Managing day-to-day operations and staffing;
- Strategic partnerships and liaisons with other national, regional and international standards setting organizations to advance new work, adopt existing standards, lead international standards development work, and/or coordinate member participation in other standards work DGSI expects to develop or adopt;

- c. Handling complaints of a procedural nature;
- d. Addressing International inquiries and complaints from other standard development organizations having accepted the WTO/TBT Annex 3 Code of Good Practice for the Preparation,
 - Adoption and Application of Standards; and
- e. Ensuring the consistent application of DGSI Standards Setting Directives.

Funding for DGSI standards development and maintenance activities are provided in any of the following ways:

- Membership fees;
- Financial support provided by industry groups such as associations, by government, or individuals interested in the development or maintenance of a standard; and
- Financial support provided through the sale of DGSI standards and other publications.

4.6 Facilities and records management

DGSI is located at 1000 Innovation Dr., Suite 500, Ottawa, ON K2K 3E7. DGSI equips its standards development activities with computers, network solutions, telecommunications, teleconferencing equipment, meeting and conference rooms, a website, and storage space. DGSI standards development activity records are stored by electronic means and retained in perpetuity.

All policies, procedures, and other documentation related to standards development are stored in a folder separate from the documentation intended for any certification function, as per SCC requirement 5.3 (Separation of Management Activities).

4.7 Developing standards

Any stakeholder may propose new technical work and participate in any DGSI standards development activity.

A proposal for new technical work is directed to the DGSI Standards Policy Committee for approval. The DGSI Standards Policy Committee considers the need and interests prior to approval including considerations specified in Clauses 4.2 (Identification of Canadian Interest & Need) and 4.3 (Avoiding Duplication) of Standards Council of Canada's Requirements & Guidance – Accreditation of Standards Development Organizations.

The DGSI Secretariat is responsible for:

- a. Providing sufficient information on proposals to support informed consensus decision making by the DGSI Standards Policy Committee to ensure proposals are properly developed in accordance with Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations;
- b. Monitoring SCC's Centralized Notification System (CNS) platform and addressing duplications using the Duplication Resolution Mechanism and resulting Action Plan as described in SCC's Canadian Standards Development Program Overview;
- c. Notifying the Canadian public on SCC's Central Notification System (CNS), as appropriate, of DGSI Standards Policy Committee decisions on approved new work, standards made available for public review for 60 days, standards or endorsements published at completion, reconfirmed new work and standards withdrawn in accordance with Clause 6.6 (Notification Requirements) of Standards Council of Canada's Requirements & Guidance Accreditation of Standards Development Organizations, and Clause 4.3.1 (Endorsement Method) and Clause 6.3 (Endorsement Notice Content) of the Requirements & Guidance National Adoptions of International/Regional Standards and Other Deliverables;

NOTE: A new Notice of Intent (NOI) shall be issued if an approved proposal has not progressed to a first Working Draft within a maximum timeframe of 12 months.

d. Publish a work program in accordance with Clause 4.4 (Work Program), including Subclauses 4.4.1, 4.4.2, 4.4.3, and Clause 6.5 (Use of ISONET: International harmonized stage codes and International Classification for Standards) of Standards Council of Canada's Requirements & Guidance – Accreditation of Standards Development Organizations;

NOTE: The DGSI Work Program is updated monthly and is available at any time via https://dgc-cgn.org/standards/work-program/

- e. Direct comments on published DGSI standards shall be provided to the responsible technical committee for consideration in accordance with Clause 6.6.3 (Notice of Completion) of Standards Council of Canada's Requirements & Guidance Accreditation of Standards Development Organizations;
- f. Recruiting, encouraging and recording participation, including invitations to participate from experts and interested stakeholders and addressing the challenges of finding resources for participation in DGSI standards development activities;
- g. Assisting committee leadership (e.g., technical committee chairs) and documenting technical committee approval decisions and international, regional, and national

standards considered in accordance with:

- Clause 6.7, including Subclauses 6.7.1 and 6.7.2 requirements and guidance (Technical Committee Approval Process) of Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations; or
- If a national adoption of an international or regional standards or other deliverable, Clause 5.2 (Technical Committee Approval), including Subclause 5.2.1 of Standards Council of Canada's Requirements & Guidance - National Adoptions of International/Regional Standards and Other Deliverables.
- h. Organizing and documenting staff training;
- i. DGSI standards formatting and its accordance with Clause 4.15 (Standards for Conformity Assessment), Clause 4.16 (Safety Markings), Clause 4.18 (Declaration of Compliance with Accreditation Requirements) of Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations, and:
 - Section 7 (Format Requirements) of Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations; or
 - If a national adoption of an international or regional standards or other deliverable, Clause 4.3.2 (republication Method), Clause 4.4 (Degrees of Correspondence), Clause 4.5 (Technical Deviations), and Section 6 (Format Requirements) of Standards Council of Canada's Requirements & Guidance – National Adoptions of International/Regional Standards and Other Deliverables.
- j. Initiating periodic maintenance of published standards in accordance with:
 - Clause 6.10.1 (Periodic Maintenance), and Clause 6.11 (Maintenance Outcomes), including Subclauses 6.11.1, 6.11.2, 6.11.3, 6.11.4 of Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations; and
 - If a national adoption of an international or regional standard or other deliverable, Clause 5.3 (Maintenance of Adoptions), including Subclause 5.3.1 of Standards Council of Canada's Requirements & Guidance - National Adoptions of International/Regional Standards and Other Deliverables.

- k. Publishing DGSI approved standards under reasonable terms and conditions approved by the DGSI Executive Director and submitting to SCC electronic copies, including relevant metadata in accordance with Clause 6.9 (Publication Process) of Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations;
- I. Provide standards development-related information on request, within the limits of applicable privacy legislation; and
- m. Maintain DGSI list of patent declarations and publish on DGSI's website for public availability.

4.8 Meetings

Committee meetings shall use modern electronic means to carry out work wherever possible. In-person meetings should be convened only when it is necessary to discuss draft standards or other matters of substance which cannot be settled by other means.

Committee leadership should group meetings dealing with related subjects to improve communication and limit the burden of attendance at meetings for those who participate in several committees.

The date and place of a meeting shall be subject to a general agreement between the chairperson, secretariat and committee concerned.

In order for a committee meeting to take place, a quorum representing a balance between interest categories (in accordance with subsection 4.4b) shall be in attendance.

Each committee shall remain in existence for interpreting standards, and for future revisions unless the standard is withdrawn at which time the committee shall be dissolved.

4.9 Technical Committee Leadership

The technical committee chair and vice-chair(s), appointed by the Standards Policy Committee, divests him- or her-self from any position and is responsible for:

a. The overall management of the technical committee, its composition and balance with support from the DGSI Standards Branch and guidance provided in Standards Council of Canada's Requirements & Guidance - Accreditation of Standards Development Organizations, and Requirements & Guidance - National

Adoptions of International/Regional Standards and Other Deliverables;

- b. Testing for consensus and reaching agreement on draft standards, and their readiness for public review by using any combination of the following:
 - i. DGSI's online collaboration tools (e.g., polling);
 - ii. Through technical committee meetings by recorded vote; and/or
 - iii. By letter ballot.
- c. Remaining current on DGSI policies and procedures.

The technical committee chair and vice chair(s), as appropriate, shall advise the technical committee secretariat to issue a final call for comments, inclusive of a public review for a duration of 60 calendar days at minimum on the technical aspects of the draft standard. Should urgent problems of safety, health or environment arise or threaten to arise, a determination shall be made if a 45-day public review period is appropriate. The technical committee chair and vice chair(s), as appropriate, may request technical committee approval during the final call for comments or following the disposition of those comments and those received from the public during the public review period. The technical committee shall have achieved consensus on the technical aspects of a draft standard under the following conditions:

- a. More than 50 % of the technical committee participants cast votes in favour;
- b. A minimum of two-thirds majority of the votes cast by the technical committee are in favour;
- c. Not more than one-quarter of the total number of votes cast are negative;
- d. The technical committee has dispositioned a final call for comments, including comments received during public review; and
- e. The technical committee has addressed negative votes and if accepted, the required adjustment(s) are made to the technical aspects of the draft standard. If not accepted, rationale is provided by the technical committee and the voter is informed of the decision.

DGSI provides secretariat support for committees under its responsibility, and trained DGSI staff responsible in performing said responsibilities. Technical committee chair and vice chair(s) responsibilities may be assumed by the secretariat in cases where the Standards Policy Committee appoints DGSI staff to the role. Technical committee

secretariat responsibilities include, but are not limited to:

- Preparing draft standards, arranging their distribution and the treatment of comments and ballots received;
- Assisting in the establishment of priorities and target dates for each workitem;
- Proposing the publication of alternative deliverables or cancellations of work items that appear to lack sufficient support;
- Establishing meeting agendas and arranging for their distribution;
- Arranging the distribution of all documents supporting the agenda, including reports and other necessary documents for discussion during a meeting;
- Recording consensus decisions taken either in a meeting by recorded vote, through DGSI's online collaboration polling tools and/or by letter ballot, and making these decisions available in writing to the technical committee for confirmation during a meeting; and
- Preparing and circulating meeting minutes following meetings.

4.10 Corrections

DGSI may issue a correction to published DGSI standards to address errors or ambiguities, inadvertently introduced either in drafting or in publishing and which could lead to incorrect or unsafe application of the standard. Corrections are not issued to update information that has become outdated since publication.

Suspected errors shall be brought to the attention of the Council's Standards Policy Committee Chair concerning introductory pages of DGSI standards and to the technical committee chair responsible for the development of affected standard(s) for errors associated with the technical aspects of DGSI standards.

In case of errors associated with the technical aspects of DGSI standards, the technical committee chair shall consult the technical committee and submit a proposal for correction to the Standards Policy Committee Chair. The Standards Policy Committee Chair shall be responsible for deciding on the publication of a corrected version. The Standards Policy Committee Chair may consult the Standards Policy Committee and shall notify the technical committee of its decision.

In case of errors associated with the introductory pages, the Standards Policy Committee Chair shall be responsible for deciding on the publication of a corrected version of the existing.

edition and notify the applicable technical committee. If necessary, the Standards Policy Committee Chair may consult the Standards Policy Committee. The Standards Policy Committee Chair shall notify the Executive Director of its decision.

DGSI shall notify affected stakeholders upon having published a corrected version.

4.11 Patents

Attention is drawn to the possibility that some of the elements included in DGSI standards may be subject to patent rights.

Any party participating in the work of DGSI is, from the outset, to disclose to the DGSI Standards Branch any known patent or known pending patent application, either their own or of other organizations.

If a DGSI standard includes an essential patent wherein the invention is indispensable for applying the DGSI standard, the patent holder shall provide a signed written statement to DGSI Standards Branch agreeing to a willingness to negotiate licenses with other parties on a non-discriminatory basis on reasonable terms and conditions, and to performing such negotiations outside DGSI. In cases where the patent holder is not willing to comply with the provisions above, the DGSI standard shall not include the patent.

4.12 Conflict of Interest

Any party involved in DGSI standards development, including DGSI staff, shall disclose any real or perceived conflicts of interest to the Standards Branch of DGSI and withdraw themselves immediately from the discussion and/or activity.

4.13 Complaints and Appeals

Any stakeholder may submit a complaint to DGSI. Complaints may be either technical or a procedural nature. Complaints shall be made in writing and addressed to the DGSI Standards Branch.

Complaints of a technical nature shall be handled by the responsible technical committee. Procedural complaints shall be handled by DGSI's Standards Branch in accordance with DGC's complaints and appeals procedure. Complaints shall be handled giving respect to matters of confidentiality, conflict of interest and impartiality as specified in the DGC's Ethics Statement, a policy that applies to DGSI employees, Council members and committee participants.

The decision on the technical matter may not be appealed beyond the technical committee. The decision on the procedural matter may be appealed. The time to respond to a complaint shall not exceed 60 calendar days.

DGSI may consult the responsible technical committee, and its chair following receipt of a complaint.

The complainant may appeal the decision in writing no later than 30 calendar days following the DGSI Standards Branch communication to the complainant on the decision to the chair of the Standards Policy Committee, who may at their discretion, assemble an independent appeals panel of persons not participating in DGSI's standards development activities. Appeals shall be handled in accordance with DGSI's complaint and appeals procedure.

The final decision made by DGSI's Appeals Panel may be appealed within 90 calendar days to SCC's VP, Accreditation Services.

DGSI complaints handling and appeals procedures are made available and accessible to stakeholders upon request made to DGSI Standards Branch.

5. DGSI Standards Drafting Directives

5.1 Performance Based Standards

DGSI standards shall express requirements in terms of performance rather than by design or descriptive characteristics whenever possible.

5.2 Accreditation

DGSI shall be accredited to develop standards by an approved member of the IAF. The accreditation shall be maintained on a periodic basis, according to the accreditation body's requirements. The DGSI shall support this accreditation via a process to manage and resolve non-conformances.

5.3 Trade

DGSI standards shall meet the needs of the marketplace and shall to the greatest extent possible, advance trade in the broadest possible geographic and economic contexts.

DGSI standards shall not create unnecessary obstacles to international or inter-provincial trade, or both. DGSI standards impeding or inhibiting trade shall be resolved by assigned technical committees under instances where impediment or inhibition to trade was unjustified.

NOTE: DGSI standards may impede or inhibit trade under instances where the standard is legitimately written to protect the health, safety, environment or security of people as provided for under trade agreements to which Canada is signatory.

5.4 Place of Origin

DGSI standards shall not be developed so as to discriminate among products on the basis of the place of origin. Under instances where unjustified discrimination to a product has been identified by any party, DGSI shall take corrective action to resolve the identified instances and remove the potential for future instances by having technical committees review and retrain, where necessary, on SCC and DGSI prescribed policies and procedures.

5.5 Price Fixing

DGSI standards shall not be developed as a means to fix prices, nor to exclude competition or otherwise inhibit commerce beyond that necessary to meet requirements of relevant technical regulations or other legitimate sectoral or local requirements for compatibility, environmental protection, or health and safety.

5.6 Protection Against Misleading Standards

DGSI standards shall minimize the possibility standards may be used to mislead consumers and other users of the product, process or service addressed by the standard. DGSI shall resolve any identified instances of standards being used to mislead through objective and appropriate means.

5.7 Standards Drafting Requirements

In order to achieve the greatest practicable degree of harmonization with the rules for the structure and drafting of International Standards, all DGSI standards shall be drafted in accordance the requirements stated in ISO/IEC Directives, Part 2: Rules for the structure and drafting of International Standards. DGSI standards templates shall be used.

Standards shall be numbered in sequence in the order in which they are established, commencing at DGSI 100. Series of standards shall include a dash (-) following the number and remain in the sequence in which they are established as part of the series. If a standard is withdrawn, its number shall not be allocated to another standard.

DIGITAL GOVERNANCE COUNCIL Committee Governance







Digital Governance Council

Executive Forum (Governing Council)

Jim Balsillie, Chair

Impartiality Committee

Chair: Keith Jansa, Chief Executive Officer

Advisory Committee(s) (as needed)

Chair: Keith Jansa, Chief Executive Officer

Certification Committee

Chair: Director, Verification and Assessments



Digital Governance Standards Institute

Standards Policy Committee

Chair: Vanessa Vermette, Chair of Standards Institute Secretary: Darryl Kingston, Executive Director, Digital Governance Standards Institute

Data Governance TC 1

Chair: Darryl Kingston Vice-Chair: Vacant

Ethical AI TC 2

Chair: Darryl Kingston Vice-Chair: Vacant

Digital Skills TC 3

Chair: Darryl Kingston Vice-Chair: Vacant

Digital Trust & Identity TC 4

Chair: Darryl Kingston Vice-Chair: Andrew Johnston. Interac

Cybersecurity TC 5

Chair: Darryl Kingston Vice-Chair: Darrell O'Donnell, Continuum Loop

Connected Cities TC 6

Chair: Darryl Kingston Vice-Chair: Vacant

Autonomous Vehicles TC 7

Chair: Darryl Kingston Vice-Chair: Vacant

Modern Procurement

TC8

Chair: Darryl Kingston Vice-Chair: Vacant

Privacy Access & Control TC 9

Chair: Darryl Kingston Vice-Chairs: Sharon Polskly, Amina Corp, Pierce White-Joncas, Canadian Blood Services

Open Finance

TC 10

Chair: Darryl Kingston Vice-Chair: Eyal Sivan, Axway

Online Electoral Voting TC 11

Chair: Dr. Nicole Goodman, Brook University

Vice-Chair: Cherlene Tay

Digital Assets and Nonfungible-Tokens

TC 12

Chair: Darryl Kingston Vice-Chair: Vacant DISBANDED

Health Data and Information TC 13

Chair: Darryl Kingston Vice-Chair: Vacant

Voting Technology TC 14

Chair: Darryl Kingston Vice-Chair: Vacant

Biometrics TC 15

Chair: Darryl Kingston Vice-Chair: Vacant

Regulatory Sandbox TC 16

Chair: Cherlene Tay Vice-Chair: Vacant

Land Use & Planning Development TC 17

Chair: Darryl Kingston Vice-Chair: Vacant

Age Verification Technology

TC 18

Chair: Darryl Kingston Vice-Chair: Vacant

Digital Credentials TS

Chair: Darryl Kingston Vice-Chair: Vacant

Agricultural Blockchain

TC

Chair: Darryl Kingston Vice-Chair: Vacant



Annex D - List of Published Standards

All of our published standards are available on our <u>corporate website</u>, for access or non-commercial download at no cost.

Agricultural Blockchain

DGSI/TS 114, Technical Specification for Agricultural Blockchain – Traceability of Canola Through the Canadian Supply Chain

Automated Decision Systems (AI)

CAN/DGSI 101, Ethical Design and Use of Automated Decision Systems

DGSI /WA 126, Baseline Requirements for Vendors Offering AI/ML Lifecycle Solutions to Financial Institutions

Biometrics

CAN/DGSI 120: Use of Biometrics for Authentication

Connected Cities

CAN/DGSI 106-1, Connected Cities - Part 1: Discovery of Digital Twins for Built Environments

Cybersecurity

CAN/CIOSC 104, Baseline Cyber Security Controls for Small and Medium Organizations

CAN/DGSI 105, Cybersecurity of Industrial Internet of Things (IIoT) Devices

CAN/DGSI 118: Cyber Resiliency in Healthcare

Data Governance

CAN/DGSI 100-1, Data Governance - Part 1: Data Centric Security

CAN/DGSI 100-2, Data Governance - Part 2: Third-Party Access to Data

CAN/DGSI 100-4, Data Governance - Part 4: Scalable Remote Access Infrastructure

CAN/DGSI 100-6, Data Governance – Part 6: Responsible governance of employee information

CAN/DGSI 100-7, Data Governance – Part 7: Operating model for responsible data stewardship

CAN/DGSI 100-8: Data Governance - Part 8 - Framework for Geo-Residency and Sovereignty

CAN/CIOSC 100-9, Data Governance - Part 9: Zero-Copy Integration

CAN/DGSI 117, English-French Lexicon for Digital Governance and Technologies

Digital Credentials

DGSI/TS 115, Technical Specification for Digital Credentials and Digital Trust Services

Digital Skills

CAN/DGSI 112, National Occupational Standard for Cybersecurity

Digital Trust & Identity

CAN/DGSI 103-1, Digital Trust & Identity - Part 1: Fundamentals

CAN/DGSI 103-2, Digital Trust & Identity - Part 2: Delivery of Healthcare Services

CAN/DGSI 103-3: Digital Trust & Identity - Part 3 - Digital Credentials

Electoral Voting Technologies

DGSI 119-1: Standard for Vote Tabulators

DGSI 119-2: Standard for Electronic Poll Books

Health Data & Information

CAN/DGSI 100-5, Data Governance - Part 5: Health Data and Information Capability Framework

CAN/DGSI 116: Health Data and Information Lexicon

Impact Reporting

DGSI/TS 122, Technical Specification (TS) for Impact Statements for profit-oriented entities

Modern Procurement

CAN/DGSI 108, Agile and open procurement of digital solutions

Open Finance

CAN/DGSI 110-1, Open Finance - Part 1: Customer Experience

Privacy & Access Control

CAN/DGSI 109-1, Privacy – Part 1: Qualification and Proficiency of Access-to-Information, Privacy, and Data Protection Professionals

CAN/DGSI 109-2, Privacy - Part 2: Canadian information Privacy Protection Framework

Land Planning and Development

DGSI 124, Standard for Planning and Development Applications: Terminology

DGSI 125, Standard for Planning and Development Applications: Common fields for use in municipal planning application forms

Annex E - List of Participating Organizations

Below is a list of organizations that have consented to be included for their contributions to the development of standards through the Digital Governance Standards Institute as part of this application. This consent does not indicate their endorsement or support for the Institute's application to the CFPB.

Institute's application to the CFPB.		
	5Rights Foundation	
	Affiniti Quest	
	Age Verification Providers Association	
	Aptum	
	Applied Recognition	
	Bitnobi Inc	
	Bridge2Future	
	Brock University	
	Canadian Digital Service, Government of Canada	
	Canadian Health Infoway	
	Canadian Mental Health Association - Toronto Branch	
	Canadian Regulatory Technology Association	
	CEWILCanada	
	Centre for International Governance Innovation	
	City of Edmonton	
	City of Guelph	
	City of Kingston	
	City of Kawartha Lakes	
	Click Armor	
	Coalition of Innovation Incubators	
	Concordia University	
	Conservation Ontario	

Connecting to Protect

Confiance IA Crypto Mill Cyber Security Canada Deloitte **Election Solutions** Eaton Industries (Canada) Company **Ethical Capital Partners** Fairly Al Fifalde Consulting Inc. Fullspeed Technology Inc. **GEM Privacy Government of Ontario Gray Matters Connections Inc. HealthcareCAN** Health Insurance Reciprocal of Canada Helpful Places Hospital Foundation of Health and Social Services Hospital for Sick Children Hudson's Bay Company **Identification Canada** Identos Information and Communications Technology Council (ICTC) Information Management Strategy and Policy Branch, Ministry of Health and Ministry of Long-Term Care, Government of Ontario Institute of Health Policy, Management and Evaluation at the University of Toronto Interac Infaque Social Enterprise Inc

Innovation, Science, and Economic Development, Government of Canada

IT6 Management Consulting Services

Islamic Family and Social Services Association

Lyn Brooks and Associates

Literacy Link

Mass Culture

Matera

McGill University

Ministry of Municipal Affairs and Housing, Government of Ontario

Ministry of Public and Business Service Delivery, Government of Ontario

Municipal Information Systems Association, Ontario

Municipality of Clarington

New Brunswick Institute for Research, Data and Training (NB-IRDT) a research institute of the University of New Brunswick

Newfoundland and Labrador Health Services

Newport Thomson

OPEXCELLENCE Corp

Office of the Privacy Commissioner of Canada

Ontario Professional Planners Institute

Ontario Trillium Foundation

Oppos Incorporated

Open Finance Network Canada (OFNC)

Opris and Associates

Own Innovation

Privacy & Access Council of Canada

Privacy Pro

Plan International Canada

Provincial of Nova Scotia Reclaiming Democracy Samarth Solutions Inc. Schulich School of Business at York University Simply Voting Inc. **Smart Waterloo Region Innovation Lab** Soyez Cloud St. Clair College **Sydney Computer Systems Tehama** The Access Information Agency Inc The Corporation of the Township of Woolwich Town of Ajax Town of Oakville **Toronto Regional Real Estate Board** Treasury Board Secretariat, Government of Canada Valencia VanWyn Inc. Wedge Networks Inc. Western University Professor York University