



SSC # 76 – ESTATE FREEZES AND CORPORATE REORGANIZATIONS

This course is eligible for:

2.5 Life & A&S CE Credits for BC, SK, MB & ON.

2.5 Life ONLY CE Credits for AB.

Target Audience

- Licensed life and accident & sickness (A&S) insurance advisors holding provincial licences issued by CISRO member regulators
- Certified Financial Planner® (CFP®) professionals and Qualified Associate Financial Planner™ (QAFP™) professionals certified by FP Canada
- Chartered Life Underwriter (CLU®), Certified Health Insurance Specialist (CHS™), and Trust and Estate Practitioner (TEP) designate
- Mutual fund dealing representatives and investment dealer representatives registered with CIRO
- Financial planners operating under provincial financial planning title protection legislation
- Branch managers and compliance officers responsible for supervisory oversight of succession planning recommendations

Secondary Audience

- Chartered Professional Accountants (CPAs) providing integrated tax and succession advisory services
- Corporate and commercial lawyers advising on share reorganisations, shareholders' agreements, and trust structures
- Business valuers (CBVs) engaged in succession and estate planning mandates

- Insurance carrier wholesalers and MGA representatives supporting advanced case design
- Trust officers at banks and trust companies managing family trust portfolios

Course Purpose

The purpose of this course is to equip Canadian financial advisors with the knowledge, analytical frameworks, and practical tools required to identify estate freeze opportunities among business-owner clients, understand the mechanics and tax implications of section 85 rollovers and section 86 share exchanges, evaluate the role of family trusts in freeze planning (including the 21-year deemed disposition rule and Budget 2025 changes), and integrate insurance solutions that fund freeze-related tax liabilities.

Upon completion, advisors will be able to initiate and guide estate freeze conversations with confidence, adding significant value to their succession planning practice.

Learning Objectives

The learning objectives for this course are structured according to Bloom's revised taxonomy, targeting the higher-order cognitive levels of application, analysis, evaluation, and — where appropriate — creation. Each objective is measurable and aligned to specific course modules and examination questions. *Upon successful completion of this course, the learner will be able to:*

1. **Analyse** the economic and tax case for estate freezes, including the triggering events that signal when a freeze should be recommended and the interaction with intergenerational business transfer planning.
2. **Evaluate** the mechanics and tax treatment of section 86 share exchanges, including preferred share attributes, valuation requirements, and the step-by-step freeze process.
3. **Distinguish** section 85 rollovers from section 86 share exchanges, including the elected amount concept, eligible property, T2057 filing requirements, boot considerations, and holding company applications.
4. **Analyse** the role of discretionary family trusts in estate freeze planning, including income splitting advantages, LCGE multiplication, and the constraints imposed by TOSI rules.
5. **Evaluate** the 21-year deemed disposition rule, including the Budget 2025 changes to indirect transfers, the new T3 filing requirements, and strategies for managing the anniversary (rollout, wind-up, deemed disposition acceptance, insurance funding).
6. **Apply** estate freeze concepts to realistic Canadian business scenarios involving different corporate structures, family dynamics, and tax circumstances.
7. **Assess** how life insurance integrates with estate freeze planning to fund freeze-related tax liabilities, including CDA credit mechanics and policy coordination.
8. **Implement** best practices for identifying estate freeze opportunities, coordinating professional teams, and conducting annual reviews of existing freeze structures.