

Comment #15 – 3/12/10 – 5:04 p.m.

Thank you for the opportunity to comment on the second exposure draft of ASOP No. 41.

I am concerned with the following language in Section 3.2: “When the actuary intends the findings in an actuarial document to be relied upon by the intended user, then the actuary should complete an actuarial report ...”

Unless I am confused by this language and the associated definitions, this appears to be a significant expansion in the requirements for actuarial reports. As I consider my daily work, virtually every actuarial document (e-mail, exhibit, chart, etc.) I share with others would be subject to the requirement to complete an actuarial report. This is surely not the intent. Item 6 of the key changes recognizes that actuarial communication is an ongoing and interactive process. It is not realistic or practical to require an actuarial report and all of the associated requirements that actuarial reports must contain (such as sections 3.3 and 4.1) on every single actuarial document. It would bury us in bureaucratic paperwork to maintain an actuarial report for every document an actuary shares with others. This requirement goes well beyond common sense and reasonable professional practice. For example, the current standard excludes

- internal communications, for example within a company, organization, firm, or government agency; and
- communications, during the course of an assignment, among those providing actuarial services

We need to be able to use reasonable professional judgment to determine if and when an actuarial report is needed.

I am also curious why the definition of actuarial services was deleted.

Thank you for considering my comments.

--Greg Hayward