

Comment #18 – 3/19/10 – 11:28 a.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 ...”

As I read this, I see it to be a significant expansion in the requirements for actuarial reports. As I consider my responsibilities, most actuarial documents I share with others would be subject to the requirement to complete an actuarial report. I hope this is not the intended result of these changes. 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 place an extreme burden on actuaries to maintain an actuarial report for every document an actuary shares with others.

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

Thank you for your consideration.

Jay Hieb, FCAS