



Comments on the Exposure Draft of Proposed Revision to Actuarial Standard of Practice No. 23

Data Quality

February 25, 2016

The Actuarial Standards Board

The ASPPA College of Pension Actuaries (ACOPA) appreciates this opportunity to comment on the Exposure Draft of the Proposed Revision to Actuarial Standard of Practice No. 23:

Data Quality. This response to the request for comments in the exposure draft is presented by actuaries who work primarily on small to mid-sized pension plans, including plans in which a significant portion of the pension obligation is attributable to principal employees.

Comments were requested as to whether or not the proposed revision provides “appropriate guidance for an actuary preparing data for another actuary’s use”. We found the guidance presented to be appropriate, but suggest the scope would be clearer if an explicit statement were added to the effect that the standard applies if data is being prepared for use by another actuary in the same firm, as well as for use by an actuary in another firm.

This letter was prepared by the ACOPA ASOP Task Force, Richard A. Block, Chair. The primary authors were Richard A. Block, FSPA; Michael Bain, FSPA; Kurt Piper, FSPA, John Markley, FSPA and Karen Smith, MSPA.

Thank you for your consideration of these comments.

Sincerely,

/s/

Karen Smith, MSPA, President
ASPPA College of Pension Actuaries

/s/

Judy A. Miller, MSPA, Executive Director
ASPPA College of Pension Actuaries

/s/

Kurt F. Piper, FSPA, President-Elect
ASPPA College of Pension Actuaries

/s/

Richard A. Block, FSPA, Chair
ASOP Task Force