Comment #3 - 11/24/15 - 3:57 p.m.

Here are my comments on the exposure draft for ASOP No. 23:

Completeness was added to the definition of audit. This implies that the actuary does not need to test the data for completeness (in addition to accuracy). It later lists that the actuary should select data with consideration to the degree to which the data is comprehensive. These two terms are very similar and therefore I think that completeness has to be defined in contrast to comprehensiveness so that the actuary is aware of the level at which they need to make sure they need to consider. For example, if Rx claims are missing when Rx coverage is requested, is this incomplete or not comprehensive. If a list of claims are sent and the last 5 lines got accidentally removed, is that incomplete or not comprehensive?

Thanks, Jeremy Benson