

Comment #14 – 2/21/16 – 6:16 p.m.

Pinnacle Actuarial Resources, Inc. is pleased to have the opportunity to provide the following comments in regards to the Exposure Draft of the proposed revisions of ASOP 23, Data Quality.

- 1. Does this proposed revision provide appropriate guidance for an actuary preparing data for another actuary's use (for example, legislatively-mandated data submissions)?**

Section 1.2 states "If an actuary prepares **data** to be used by other actuaries in an actuarial work product or assumes responsibility for preparing **data**, the actuary should apply the relevant portions of the standard as though the actuary were using the **data**." The standard should also address the duty of care owed and the alignment of data with the data request. This is not explicit in the relevant portions of the standard.

- 2. Does this proposed revision provide appropriate guidance for working with nontraditional data sources (for example, predictive models)?**

The revision provides appropriate guidance for nontraditional data sources.

- 3. Considering the guidance in section 3.6, which discusses the quality of other information relevant to data, is the title of the standard "Data Quality" appropriate?**

The title "Data Quality" is still appropriate.

The comments above are the collected comments of the consultants employed or affiliated with Pinnacle Actuarial Resources, Inc. If you have any questions regarding the above, please contact Laura Maxwell at lmaxwell@pinnacleactuaries.com.

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