

Title of Exposure Draft: Proposed Revision of Actuarial Standard of Practice (ASOP) No. 18

Comment Deadline: September 1, 2021

I. Identification:

Name of Commentator / Company
Paul Conlin, FSA, MAAA, Aetna, a CVS Health company

II. ASB Questions (If Any). Responses to any transmittal memorandum questions should be entered below.

Question No.	Commentator Response

III. Specific Recommendations:

Section # (e.g. 3.2.a)	Commentator Recommendation (Please provide recommended wording for any suggested changes)	Commentator Rationale (Support for the recommendation)
1.1	Delete the insertion of “and public programs” to Section 1.1.	Aetna objects to, and advises against, the addition of “and public programs” to Paragraph 1.1 of the proposed revised ASOP No. 18. To date, ASOP No. 18 has applied to LTC insurance only. If there is a desire to address actuarial practice and workproducts associated with public programs, such as state Medicaid plans, there is already an ASOP to do that in: ASOP No. 32 (Social Insurance). There seems to be limited incremental value in expanding the scope of ASOP No. 18, but there do seem to be potential cross-referencing complications being unnecessarily introduced—for example, any future revision to ASOP No. 32 would require at least a consistency review of ASOP No. 18. The proposed change to the wording appears to be unprompted by any external event or actor, so we question the value and advisability of making a change with unknown unintended consequences.


IV. General Recommendations (If Any):

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)

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V. Signature:

Commentator Signature	Date
	August 12, 2021