

Title of Exposure Draft: ASOP 41

Comment Deadline: November 1, 2022

Instructions: Please review the exposure draft, and give the ASB the benefit of your recommendations by completing this comment template. Please fill out the tables within the section below, adding rows as necessary. Sample for completing the template provided at the following link: <http://www.actuarialstandardsboard.org/email/2020/ASB-Comment-Template-Sample.docx>

Each completed comment template received by the comment deadline will receive consideration by the drafting committee and the ASB. The ASB accepts comments by email. Please send to comments@actuary.org and include the phrase 'ASB COMMENTS' in the subject line. Please note: Any email not containing this exact phrase in the subject line will be deleted by our system's spam filter.

The ASB posts all signed comments received to its website to encourage transparency and dialogue. Comments received after the deadline may not be considered. Anonymous comments will not be considered by the ASB nor posted to the website. Comments will be posted in the order that they are received. The ASB disclaims any responsibility for the content of the comments, which are solely the responsibility of those who submit them.

I. Identification:

Name of Commentator / Company
Casey Hammer, FSA / Comments are submitted on my behalf NOT my company (Milliman)

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)
3.3.3	I think the section with a bullet point should be a "b." or something easier to refer to than a bullet point.	Easier to reference
3.2	I don't understand the "Subsequent to" issuing the oral communication piece.	Shouldn't the form and content, clarity, timing, etc be determined ahead of providing oral content? Also, on the "Identification of Responsible Actuary" in an oral communication, could you provide guidance on how to do that in an oral communication? Are we expected to end all phone calls where we've answered an actuarial question saying that we're an actuary?

IV. General Recommendations (If Any):

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)
Add explicit standards on social media conduct and white papers	Based on the definition of principal, my understanding of this ASOP is that it only applies to communications to a client or employer. I spoke with the ABCD and the member assigned to

Title of Exposure Draft: ASOP 41

Comment Deadline: November 1, 2022

	<p>my question agreed that social media/white papers are not governed by ASOP 41 and listed a few precepts that could apply.</p> <p>I believe these communications are most visible to the public and have the ability to form public opinion about the profession. If one of the goals of the precepts and ASOPs is to protect the reputation of the actuarial profession, I believe there should be an explicit standard addressing our communications of highest public visibility.</p> <p>In attendance at one of the Actuarial Judge & Jury sessions, there was polling and discussion about social media. A large percentage of attendees did not think that the actuarial standards applied. If there was a specific call-out to social media and white papers in ASOP 41, even if it is just to reference the applicable precepts, it would at the least identify these public communications as falling under the purview of our professional standards.</p> <p>It could be argued that ASOP 41 is not the right place for such guidance. However, I recommend adding such guidance to ASOP 41 as that is where most people would look within our professional code of conduct to find such guidance.</p>
--	--

V. Signature:

Commentator Signature	Date
Casey L Hammer	8/29/2022