

**Title of Exposure Draft:** Proposed Revision of Actuarial Standard of Practice (ASOP) No. 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](mailto: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
Tia Goss Sawhney, DrPH, FSA, MAAA / Teus Health, LLC Submitted on behalf of self

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

Question No.	Commentator Response
1	The distinction between the contents of an actuarial communication and a report is clear, but when to use one or another is somewhat buried. See Specific Recommendations.
2	I am fine with the positive disclosure language.

**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)
?	<u>This standard applies even when the intended users of the actuarial communication or report are internal to the actuary's organization.</u>	I have called-out internal actuaries on poorly communicated work and they have told me that actuarial standards simply do not apply for internal work. I therefore recommend that this statement should appear somewhere within the standard. It is suggested in Section 3.3.6 but not explicitly stated.
3.1.4	The actuary... should indicate the extent to which the actuary is or is not available to provide supplementary information and explanation, <u>including to whom they are willing to provide the information and explanation.</u>	The sharing of information and explanation is situational.
3.3	I suggest that the first paragraph of 3.3 should be titled " <u>When an Actuarial Report Should be Issued</u> ". And that the subsequent paragraph and subparagraphs should be "Requirements for an Actuarial Report" (the current title).	This will make it easier for the reader to find the appropriate circumstances for an actuarial report.
3.6	Define "Other Sources"	"Other sources" is vague and not defined in this section or within the Definitions. Is it intended to mean data, methods, or assumptions? Absent a

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		definition, the last sentence seems to imply that it's only for data. Is that the intent?
3.7	When issuing an actuarial communication, the actuary <u>must retain actuarial documentation sufficient for the actuary to explain and replicate the actuary's work. The actuary should consider preparing and retaining documentation</u> in a form such that another actuary....could assess....	At a minimum the actuary should retain documentation that allows them to explain and replicate their work. Depending on circumstances, they may need to prepare and retain documentation that is in a format that is easily interpretable by others.

**IV. General Recommendations (If Any):**

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

**V. Signature:**

Commentator Signature		Date	August 26, 2022
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