I. Identification:

Name of Commentator / Company
Kimberly Annon Marjorie Carlson Seth Harlow Ariel Weis

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

N/A

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)
1.2	Clarify scope	We do not understand how nondiscrimination testing is defined.
2.6	Recommend "A measurement of the ~~outcomes of a~~ contingent events <u>that are</u> mitigated by the financial or personal security system."	Risk measures are measurements of the contingent events themselves (e.g., death), not their outcomes (e.g., death claim payment).
3.1	Delete?	We question whether this section is needed.
3.2.1	"The actuary should confirm that the risk classification framework is <u>reasonably</u> appropriate for the intended purpose and intended use."	A requirement to confirm appropriateness feels too onerous because it seems to imply an expectation for establishing the truth.
3.2.2	"The actuary should confirm that the data and model(s) used for the risk classification framework are <u>reasonably</u> appropriate<u>, as appropriate within the scope of the actuary's assignment</u>."	Same rationale as above for 3.2.1. It may not be appropriate for the actuary to confirm the appropriateness of data and models if involved in a limited capacity.
3.2.3	<u>When considering whether it is appropriate to use a risk characteristic, the actuary should take into account the following</u>: ~~Whether it is appropriate to use a risk characteristic may depend on~~: <u>a.</u> the scope and context of the actuary's work;	We believe that unintended bias and the concepts in this section are linked and believe this is more actionable guidance for the actuary as it relates to unintended bias.

	b. societal, regulatory, and industry practices, and ~~or may depend on~~ ; c. the potential for unintended bias.	
3.2.5	Move "The actuary should take into account that a lack of ongoing monitoring of the risk classification framework may increase the risk of adverse selection." to section 3.3	Section 3.3 provides guidance for existing risk classification frameworks
3.2.5	Modify the first sentence: "~~The actuary should assess the potential for a~~ Adverse selection effects ~~that~~ may result ~~or have resulted~~ from the design, development, selection, modification, or continued use of the risk classification framework."	More clear as educational sentence introduction.
3.2.5	Modify the third sentence: "When practical and appropriate within the scope of the actuary's assignment, the actuary should <u>assess the potential for adverse selection and</u> consider estimating the potential impact of adverse selection or mitigating the impacts of material adverse selection."	Limits assessment to when practical and appropriate and aligns with additional guidance.
3.2.6	Delete the first sentence: The actuary should take into account whether the risk characteristics can be objectively determined.	Unclear how to apply this guidance. Prefer suggested guidance below.
3.2.6	Add a sentence: "When practical and appropriate within the scope of the actuary's assignment, the actuary should assess the potential impacts of using risk characteristics that cannot be objectively determined."	Mirrors guidance in 3.2.5.
3.3	Suggest rewording the first sentence to recognize that there may be poor documentation and no way for the actuary to understand the frequency of past reviews.	Otherwise, failure to understand would constitute a deviation from the ASOP, which does not seem appropriate.
3.3	Suggest putting this section into list format.	Many of the sentences start with "the actuary should take into account," so the language seems conducive to a list.
3.4	Delete (move concept of unintended bias to 3.2.3)	See comments in 3.2.3

IV.   General Recommendations (If Any):
N/A

V. Signature:

Commentator Signature	Date
Kimberly Annon Marjorie Carlson Seth Harlow Ariel Weis	5/1/2024