

**Title of Exposure Draft: ASOP 41: Actuarial Communications**

**Comment Deadline: 6/1/2026**

**I. Identification:**

Name of Commentator / Company
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**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)
1.1	Recommend the underlined change: "This actuarial standard of practice (ASOP or standard) provides guidance to actuaries <del>when issuing on</del> <u>issuing on</u> actuarial communications, <u>regardless of format or medium.</u> "	The phrase "issuing actuarial communications" signals formality, while "in any form" signals informality. This sends mixed messages because it mixes scope and tone in the same clause. The word 'issues' is more appropriately used in 2.2 regarding an Actuarial Report.
2.1	Replace with the following: "Any written or oral communication by an actuary relating to actuarial services, regardless of format or medium."	This removes the formality signal from using the word "issued."  Defining what "electronic communication" is in this section is unnecessary.
3.3 4.1.b	Section 3.3: Remove the last sentence: "The actuary should also indicate the extent to which the actuary or other sources are available to provide supplementary information and explanation"	This sentence/clause are unrelated to the key idea of 3.3 which is about the proper identification of the Responsible Actuary.

	<p>unless, in the actuary's professional judgment, the intended users will otherwise be adequately informed about such availability."</p> <p>Section 4.1.b: Remove the following or consider as a stand-alone point: "...and the extent to which the actuary or other sources are available to provide supplementary information and explanation"</p>	<p>If the intent of the sentence must be kept, it should be its own stand-alone point.</p> <p>As an example, ASOP 23 addresses this same idea as a stand-alone idea 3.2.b.6 "...the availability of additional or alternative data and the benefit to be gained from such additional or alternative data..."</p> <p>Similar reasoning to the suggested comment for Section 3.3.</p>
3.4	<p>Recommend the following change to the 2<sup>nd</sup> sentence:</p> <p>"The actuary should recognize the risks of misquotation, misinterpretation, or other misuse of the actuarial communication, <del>and should therefore, In order to reduce the risk of misunderstanding or unintended reliance,</del> the actuary should take reasonable steps to present the actuarial communication clearly and fairly and to include, as appropriate, limitations on the distribution and use <del>utilization</del> of the actuarial communication."</p>	<p>This frames limitations as a risk-control tool, not a disclosure mechanism and avoids implying an obligation to inform via disclosures to non-intended users.</p>
3.6	<p>Recommend the following change to the 1<sup>st</sup> sentence: "When <del>issuing an actuarial communication that includes a statement of actuarial opinion resulting from an actuarial analysis of data,</del> the actuary should <u>either</u> issue an actuarial report or <del>confirm that an actuarial report has been or will be issued</del> <u>clearly identify the actuarial report supporting the opinion.</u>"</p>	<p>The first clause in the 1<sup>st</sup> sentence should be simplified for more alignment with the definition in 2.2. An actuarial report is simply a document that supports a statement of actuarial opinion. It is not a document that supports an actuarial communication containing an actuarial opinion that results from analysis of data. The current language in 3.6 obfuscates the meaning of Actuarial Report and adds unnecessary qualifiers.</p> <p>Additionally, the current wording obscures the underlying rule because it focuses on the procedural act of issuing or confirming a report rather than clearly stating the substantive requirement that any statement of actuarial opinion must be supported by an actuarial report.</p>
4.2.f	<p>Recommend the following change: "a description of the data, assumptions, methods, <del>and</del> models, <u>and reliance on artificial intelligence</u> used by the actuary with sufficient clarity that another actuary qualified in the same practice area could make an objective appraisal of the reasonableness of the actuary's work"</p>	<p>This is a minimal update that recognizes that use of artificial intelligence as a method or model should be disclosed if there is true material reliance on it.</p>

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

Subsection 4.2 has a-k, several of which two more layers of sub-bullets going through numbers 1-5 and then i-iv. It would be much easier to read and understand if this sub-section was reorganized so that it did not contain so many layers. It is very unfortunate that 'i' appears multiple times in the same cascade: Section 4\subsection i \ subsection 5 \ subsection i.

In the same section, a previous draft of ASOP 41 included a sub-header that noted 4.2.d (previously section 3.4.2) pertained to "Conflict of Interest", which helped with the overall readability of the ASOP and suggest reconsideration of inclusion of sub-headers.

**V. Signature:**

Commentator Signature	Date
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