



ACTUARIAL STANDARDS BOARD

**Actuarial Standard
of Practice
No. 35**

Revised Edition

**Selection of Demographic and
Other Noneconomic Assumptions
for Measuring Pension Obligations**

**Developed by the
Pension Committee of the
Actuarial Standards Board**

**Adopted by the
Actuarial Standards Board
September 2014**

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TO: Members of Actuarial Organizations Governed by the Standards of Practice of the Actuarial Standards Board and Other Persons Interested in the Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations

FROM: Actuarial Standards Board (ASB)

SUBJ: Actuarial Standard of Practice (ASOP) No. 35

This document contains the final version of a revision of ASOP No. 35, *Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations*.

Background

The ASB provides coordinated guidance for measuring pension and retiree group benefit obligations through the series of ASOPs listed below.

1. ASOP No. 4, *Measuring Pension Obligations and Determining Pension Plan Costs or Contributions*;
2. ASOP No. 6, *Measuring Retiree Group Benefits Obligations and Determining Retiree Group Benefits Program Periodic Costs or Actuarially Determined Contributions*;
3. ASOP No. 27, *Selection of Economic Assumptions for Measuring Pension Obligations*;
4. ASOP No. 35, *Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations*; and,
5. ASOP No. 44, *Selection and Use of Asset Valuation Methods for Pension Valuations*.

Exposure Draft

An exposure draft of this ASOP was issued in September 2013 with a comment deadline of January 31, 2014. The Pension Committee carefully considered the six comment letters received. A number of clarifying changes were made to the text. Please see the appendix for a detailed discussion of the comments received and the reviewers' responses.

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Key Changes

The most significant modifications from the existing version of ASOP No. 35 to this final revision are as follows:

1. The guidelines for a reasonable assumption in section 3.3.5 are now consistent with the guidelines contained in ASOP No. 27.
2. The guidance in this ASOP was revised to require disclosure of rationale for assumption selection. Section 4.1.2 requires the actuary to “disclose the information and analysis used in selecting each demographic assumption that has a significant effect on the measurement.” Section 4.1.3 requires that “for each assumption that is neither a prescribed assumption or method set by another party nor a prescribed assumption or method set by law, the actuary should include an explanation of the information and analysis that led to the change.”

The Pension Committee thanks former committee members Gordon C. Enderle and A. Donald Morgan, IV for their assistance with drafting this ASOP.

The ASB adopted this revision of ASOP No. 35 at its September 2014 meeting.

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The Actuarial Standards Board (ASB) sets standards for appropriate actuarial practice in the United States through the development and promulgation of Actuarial Standards of Practice (ASOPs). These ASOPs describe the procedures an actuary should follow when performing actuarial services and identify what the actuary should disclose when communicating the results of those services.

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ACTUARIAL STANDARD OF PRACTICE NO. 35

**SELECTION OF DEMOGRAPHIC AND
OTHER NONECONOMIC ASSUMPTIONS FOR
MEASURING PENSION OBLIGATIONS**

STANDARD OF PRACTICE

Section 1. Purpose, Scope, Cross References, and Effective Date

- 1.1 Purpose—This standard does the following:
- a. provides guidance to actuaries in selecting (including giving advice on selecting) demographic and other noneconomic assumptions for measuring obligations under defined benefit pension plans;
 - b. supplements the guidance in Actuarial Standard of Practice (ASOP) No. 4, *Measuring Pension Obligations and Determining Pension Plan Costs or Contributions*, that relates to the selection and use of demographic and other noneconomic assumptions; and
 - c. supplements the guidance in ASOP No. 6, *Measuring Retiree Group Benefits Obligations and Determining Retiree Group Benefits Program Periodic Costs or Actuarially Determined Contributions*, which relates to the selection and use of demographic and other noneconomic assumptions.
- 1.2 Scope—This standard applies to actuaries when they are selecting demographic and all other assumptions not covered by ASOP No. 27, *Selection of Economic Assumptions for Measuring Pension Obligations*, to measure obligations under any defined benefit pension plan that is not a social insurance program as described in section 1.2, Scope, of ASOP No. 32, *Social Insurance*, unless an ASOP on social insurance explicitly calls for application of this standard. Measurements of defined benefit pension plan obligations include calculations that assign plan costs to time periods, actuarial present value calculations, and estimates of the magnitude of future plan obligations. Measurements of pension obligations do not generally include individual benefit calculations, individual benefit statement estimates, or nondiscrimination testing.

To the extent that the guidance in this standard may conflict with ASOP Nos. 4 or 6, ASOP Nos. 4 or 6 will govern. If a conflict exists between this standard and applicable

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law (statutes, regulations, and other legally binding authority), the actuary should comply with applicable law.

If the actuary departs from the guidance set forth in this standard in order to comply with applicable law or for any other reason the actuary deems appropriate, the actuary should refer to section 4.

The actuary should use the guidance set forth in this standard whenever the actuary has an obligation to assess the reasonableness of a prescribed assumption. The actuary's obligations with respect to prescribed assumptions are governed by ASOP Nos. 4, 6, and 41, *Actuarial Communications*, which address prescribed assumptions and methods.

Throughout this standard, any reference to selecting demographic and other noneconomic assumptions also includes giving advice on selecting demographic and other noneconomic assumptions. For instance, the actuary may provide advice on selecting demographic and noneconomic assumptions under US GAAP or Governmental Accounting Standards even though another party is ultimately responsible for selecting these assumptions. This standard applies to the actuarial advice given in such situations, within the constraints imposed by the relevant accounting standards.

- 1.3 Cross References—When this standard refers to the provisions of other documents, the reference includes the referenced documents as they may be amended or restated in the future, and any successor to them, by whatever name called. If any amended or restated document differs materially from the originally referenced document, the actuary should consider the guidance in this standard to the extent it is applicable and appropriate.
- 1.4 Effective Date—This standard will be effective for any actuarial work product with a **measurement date** on or after June 30, 2015. Earlier adoption of this standard is encouraged.

Section 2. Definitions

The terms below are defined for use in this actuarial standard of practice.

- 2.1 Assumption Format—The form in which a particular **demographic assumption** will be used or expressed. In some cases, the assumption will take the form of a table where the probability of the occurrence of a given event depends on parameters such as gender, age, service, or calendar year. In other cases, the assumption may be a point estimate, implying 100% probability of occurrence of a given event at the stated point. An example of a point estimate assumption is an assumption that 100% of the population will retire at

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age 62. The **assumption format** may include different tables or point estimates for different segments of the covered population.

- 2.2 Assumption Universe—For each **demographic assumption**, a universe consisting of the possible options that the actuary might reasonably use for the specific assumption. For example, an **assumption universe** for a mortality assumption might reasonably include relevant published or proprietary mortality tables and possible adjustments, such as projections of mortality improvement. For some pension plans, an **assumption universe** for a specific assumption might reasonably include a table or factors developed specifically for that plan.
- 2.3 Demographic Assumptions—Demographic and all other noneconomic assumptions (i.e., those assumptions not covered in ASOP No. 27), unless explicitly stated otherwise.
- 2.4 Measurement Date—The date as of which the value of the pension obligation is determined (sometimes referred to as the “valuation date”).
- 2.5 Measurement Period—The period subsequent to the **measurement date** during which a particular **demographic assumption** will apply in a given measurement.
- 2.6 Prescribed Assumption or Method Set by Another Party—A specific assumption or method that is selected by another party, to the extent that law, regulation, or accounting standards give the other party responsibility for selecting such an assumption or method. For this purpose, an assumption or method selected by a governmental entity for a plan that such governmental entity or a political subdivision of that entity directly or indirectly sponsors is a **prescribed assumption or method set by another party**.
- 2.7 Prescribed Assumption or Method Set by Law—A specific assumption or method that is mandated or that is selected from a specified range or set of assumptions or methods that is deemed to be acceptable by applicable law (statutes, regulations, and other legally binding authority). For this purpose, an assumption or method selected by a governmental entity for a plan that such governmental entity or a political subdivision of that entity directly or indirectly sponsors is not a **prescribed assumption or method set by law**.

Section 3. Analysis of Issues and Recommended Practices

- 3.1 Overview—The actuary should use professional judgment to estimate possible future outcomes based on past experience and future expectations and select assumptions based upon application of that professional judgment. The actuary should select reasonable **demographic assumptions** in light of the particular characteristics of the defined benefit plan that is the subject of the measurement. For any given measurement, the actuary will

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typically be able to identify two or more reasonable assumptions for the same contingency.

3.2 Types of Demographic Assumptions—The types of **demographic assumptions** used to measure pension obligations may include the following:

- a. retirement;
- b. termination of employment;
- c. mortality and mortality improvement;
- d. disability and disability recovery;
- e. election of optional forms of benefits; and
- f. other assumptions such as administrative expenses; household composition; marriage, divorce, and remarriage; open group assumptions; hours of service; transfers; and assumptions regarding missing or incomplete data.

3.3 Demographic Assumption Selection Process—The actuary should follow the process below for selecting **demographic assumptions**, as applicable. The actuary need not follow this complete process at each **measurement date** for each assumption if, in the actuary's professional judgment, previously selected assumptions continue to be reasonable (see section 3.9).

3.3.1 Identify the Types of Assumptions—The actuary should identify the types of **demographic assumptions** to use for a specific measurement. In doing so, the actuary should determine the following:

- a. the purpose and nature of the measurement;
- b. the plan provisions or benefits and factors that will affect the timing and value of any potential benefit payments;
- c. the characteristics of the obligation to be measured (such as **measurement period**, pattern of plan payments over time, open or closed group, and volatility);
- d. the contingencies that give rise to benefits or result in loss of benefits;
- e. the significance of each assumption; and

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- f. the characteristics of the covered group.

Not every contingency requires a separate assumption. For example, for a plan that is expected to provide benefits of equal value to employees who voluntarily terminate employment or become disabled, retire, or die, the actuary may use an assumption that reflects some or all of the above contingencies in combination rather than selecting a separate assumption for each.

3.3.2 Consider the Relevant Assumption Universe—The actuary should be familiar with the **assumption universe** relevant to each type of assumption identified in section 3.3.1. This may include tables or factors particular to the given plan as well as general tables, factors, and modifications to the tables that are available to actuaries. Sources of information relevant to many **demographic assumptions** include the following:

- a. experience studies or published tables based on experience under uninsured plans and annuity contracts, or based on any other populations considered representative of the group at hand;
- b. relevant plan or plan sponsor experience, to the extent that it is credible, which may include analyses of gains or losses by source;
- c. studies or reports of the effects of plan design, specific events (for example, shutdown), economic conditions, or sponsor characteristics on the **demographic assumption** under consideration;
- d. studies or reports of general trends relevant to the type of **demographic assumption** in question (for example, mortality improvement in the United States); and
- e. relevant information from the plan sponsor or other sources about future expectations.

3.3.3 Consider Assumption Formats—The actuary should select an appropriate format for each **demographic assumption**. Factors that affect format specification include the following:

- a. the degree to which the **assumption format** may affect the results;
- b. the availability of tables, data, or information relevant to the assumption being selected;

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- c. the degree to which the **assumption format** has the potential to model anticipated plan experience;
- d. the size of the covered population; and
- e. the degree to which a parameter (such as gender, age, service, or calendar year) is anticipated to affect experience.

In many situations it is appropriate for the format to include assumptions for different segments of the covered population. For example, it may be appropriate to have different mortality tables for males and females or different turnover tables for salaried and hourly employees.

3.3.4 Select the Specific Assumptions—The actuary should select each **demographic assumption** from the appropriate **assumption universe**. In all cases, the actuary should determine the significance of each assumption selected, which may include the consequences of experience deviating significantly from the selected assumption. The actuary should take into account factors specific to the measurement when selecting assumptions. Examples of such factors are as follows:

- a. the purpose and nature of the measurement. For example, a cash flow projection may require more refined assumptions than a liability measure;
- b. any features of the plan design or change in the plan design that may influence the assumption. For example, the introduction of an early retirement subsidy could influence the plan's incidence of retirement; under these circumstances, in order to measure the incremental cost associated with this change, the retirement assumption for the proposed plan provision may differ from the retirement assumption for the current provision;
- c. appropriate experience from the specific plan and other relevant sources; and
- d. relevant factors known to the actuary that may affect future experience, such as the economic conditions of the area or industry, availability of alternative employment, or the human resources policy or practices of the employer.

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Specific experience of the covered group or other groups with similar characteristics may be useful in forming a judgment about future expectations. However, the actuary should not give undue weight to past experience or to experience that is not sufficiently credible. For example, if recent rates of termination and retirement were largely attributable to a one-time workforce reduction, it may be unreasonable to assume that such rates will continue over the **measurement period**.

3.3.5 Select a Reasonable Assumption—Each **demographic assumption** selected by the actuary should be reasonable. For this purpose, an assumption is reasonable if it has the following characteristics:

- a. It is appropriate for the purpose of the measurement;
- b. It reflects the actuary’s professional judgment;
- c. It takes into account historical and current demographic data that is relevant as of the **measurement date**;
- d. It reflects the actuary’s estimate of future experience, the actuary’s observation of the estimates inherent in market data (if any), or a combination thereof; and
- e. It has no significant bias (i.e., it is not significantly optimistic or pessimistic), except when provisions for adverse deviation or plan provisions that are difficult to measure are included (as discussed in section 3.10.1) and disclosed under section 4.1.1 or when alternative assumptions are used for the assessment of risk.

3.4 Range of Reasonable Assumptions—The actuary should recognize the uncertain nature of the items for which assumptions are selected and, as a result, may consider several different assumptions equally reasonable for a given measurement. The actuary should also recognize that different actuaries will apply different professional judgment and may choose different reasonable assumptions. As a result, a range of reasonable assumptions may develop, both for an individual actuary and across actuarial practice.

3.5 Specific Considerations—When performing the assumption selection process described in section 3.3, the actuary should be aware of specific considerations that may apply to the selection of individual assumptions, as discussed below.

3.5.1 Retirement—The actuary should take into account factors such as the following:

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- a. employer-specific or job-related factors such as occupation, employment policies, work environment, unionization, hazardous conditions, and location of employment;
- b. the plan design, where specific incentives may influence when participants retire;
- c. the design of, and date of anticipated payment from, social insurance programs (for example, Social Security or Medicare); and
- d. the availability of other employer-sponsored postretirement benefit programs (for example, postretirement health coverage or savings plan).

3.5.2 Termination of Employment—The actuary should take into account factors such as the following:

- a. employer-specific or job-related factors such as occupation, employment policies, work environment, unionization, hazardous conditions, and location of employment; and
- b. plan provisions, such as early retirement benefits, vesting schedule, or payout options.

3.5.3 Mortality and Mortality Improvement—The actuary should take into account factors such as the following in the selection of mortality and mortality improvement assumptions:

- a. the possible use of different assumptions before and after retirement (for example, in some small plan cases a reasonable model for mortality may be to assume no mortality before retirement);
- b. the use of a different assumption for disabled lives, which in turn may depend on the plan's definition of disability and how it is administered; and
- c. the use of different assumptions for different participant subgroups and beneficiaries.

The actuary should reflect the effect of mortality improvement both before and after the **measurement date**. With regard to mortality improvement, the actuary should do the following:

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- i. adjust mortality rates to reflect mortality improvement before the **measurement date**. For example, if the actuary starts with a published mortality table, the mortality rates may need to be adjusted to reflect mortality improvement from the effective date of the table to the **measurement date**. Such an adjustment is not necessary if, in the actuary's professional judgment, the published mortality table reflects expected mortality rates as of the **measurement date**.
- ii. include an assumption as to expected mortality improvement after the **measurement date**. This assumption should be disclosed in accordance with section 4.1.1, even if the actuary concludes that an assumption of zero future improvement is reasonable as described in section 3.3.5. Note that the existence of uncertainty about the occurrence or magnitude of future mortality improvement does not by itself mean that an assumption of zero future improvement is a reasonable assumption.

3.5.4 Disability and Disability Recovery—The actuary should take into account factors such as the following:

- a. the plan's definition of disability (for example, whether the disabled person is eligible for Social Security benefits); and
- b. the potential for recovery. For example, if the plan requires continued disability monitoring and if the plan's definition of disability is very liberal, an assumption for rates of recovery may be appropriate. Alternatively, the probability of recovery may be reflected by assuming a lower incidence of disability than the actuary might otherwise assume.

3.5.5 Optional Form of Benefit Assumption—The actuary should take into account factors such as the following:

- a. the benefit forms and benefit commencement dates available under the plan being valued;
- b. the historical or expected experience of elections under the plan being valued and similar plans; and
- c. the degree to which particular benefit forms may be subsidized.

3.6 Other Demographic Assumptions—The actuary should follow the general selection process outlined in section 3.3 when selecting other assumptions relevant to the measurement. Such assumptions may include the following:

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- 3.6.1 Administrative Expenses Charged to the Plan—The actuary should take into account expenses such as investment advisory, investment management, or insurance advisory services, to the extent that the costs of these services are not reflected in the investment return assumption; premiums paid to the Pension Benefit Guaranty Corporation (PBGC); accounting and auditing services; actuarial services; plan administration services; legal services; and trustee services. Formats for this assumption may include a dollar amount, a specific percentage of assets, a specific (and explicitly disclosed) reduction in the investment return assumption, or a percentage of benefit obligation or normal cost.
- 3.6.2 Household Composition—If household composition affects the payment of benefits, the amount of benefits, or other **demographic assumptions**, the actuary should make assumptions for household composition and for the demographic characteristics of the household members in the measurement. For example, some plans provide annuity death benefits to surviving children under a stated age. In that case, an assumption as to the number and ages of the potential beneficiaries may be needed.
- 3.6.3 Marriage, Divorce, and Remarriage—The actuary should determine whether marriage, divorce, or remarriage affects the payment of benefits, the amount or type of benefits, or the continuation of benefit payments. If such an assumption is selected, it may also be necessary to make an assumption regarding beneficiary ages.
- 3.6.4 Open Group—Certain assumptions, such as the number and characteristics of new entrants, are applicable in open-group measurements.
- 3.6.5 Hours of Service—Assumptions for hours of service are generally plan- or industry-specific. Separate assumptions may also be needed for such purposes as benefit accrual and total employer plan contributions.
- 3.6.6 Transfers and Return to Employment—The assumptions for transfers or return to employment are generally plan- or industry-specific. Transfers and return to employment may be one-time events or may be continual if employees are required or permitted to move among groups that are covered by the same or different plans.
- 3.6.7 Missing or Incomplete Data—At times, the actuary may find that the data provided are incomplete due to missing elements such as birth dates or hire dates. Provided that the actuary has determined, in accordance with ASOP No. 23, *Data*

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Quality, that the overall data are of sufficient quality to complete the assignment, the actuary may need to make reasonable assumptions for the missing data elements. In making such assumptions, the actuary should take into account the relevant data actually supplied. For example, it may be appropriate to assume a missing birth date is equal to the average birth date for other participants who have complete data and who have the same service credits as the participant whose date of birth is missing.

- 3.7 Consistency among Demographic Assumptions Selected by the Actuary for a Particular Measurement—With respect to any particular measurement, each **demographic assumption** selected by the actuary should be consistent with the other assumptions selected by the actuary unless the assumption, considered individually, is not material (see section 3.10.2). For example, if an employer’s business is in decline and the effect of that decline is reflected in the turnover assumption, it should also be reflected in the retirement assumption.

In addition, the actuary should review the assumptions for consistency with **demographic assumptions** used for measurements of different benefit plans covering the same covered group, if that information is available to the actuary. To the extent the actuary determines that inconsistencies exist, the actuary should determine whether those inconsistencies are reasonable and make adjustments where appropriate.

Assumptions selected by the actuary need not be consistent with prescribed assumptions, which are discussed in section 3.8.

- 3.8 Prescribed Assumptions—The actuary should use the guidance set forth in this standard whenever the actuary has an obligation to assess the reasonableness of a prescribed assumption. The actuary’s obligations with respect to prescribed assumptions are governed by ASOP Nos. 4, 6, and 41 as applicable, which address prescribed assumptions and methods.
- 3.9 Reviewing Assumptions—At each **measurement date**, the actuary should determine whether the selected assumptions continue to be reasonable. The actuary is not required to do a complete assumption study at each **measurement date**. However, if the actuary determines that one or more of the previously selected assumptions are no longer reasonable, the actuary should follow the general process described in section 3.3 and select reasonable new assumptions as appropriate.
- 3.10 Other Considerations—The following issues may also be considered when selecting **demographic assumptions**:

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- 3.10.1 Adverse Deviation or Plan Provisions That Are Difficult to Measure—Depending on the purpose of the measurement, the actuary may determine that it is appropriate to adjust the **demographic assumptions** to provide for adverse deviation or plan provisions that are difficult to measure, as discussed in ASOP No. 4. Any such adjustment made should be disclosed in accordance with section 4.1.1.
- 3.10.2 Materiality—The actuary should take into account the balance between refined **demographic assumptions** and materiality. The actuary is not required to use a particular type of **demographic assumption** or to select a more refined **demographic assumption** when in the actuary’s professional judgment such use or selection is not expected to produce materially different results.
- 3.10.3 Cost of Using Refined Assumptions—The actuary should take into account the balance between refined **demographic assumptions** and the cost of using refined **demographic assumptions**. For example, actuaries working with small plans may prefer to emphasize the results of general research to comply with this standard. However, they are not precluded from using relevant plan-specific facts.
- 3.10.4 Combined Effect of Assumptions—The combined effect of all nonprescribed assumptions selected by the actuary (both **demographic assumptions** selected in accordance with this standard and economic assumptions selected in accordance with ASOP No. 27) should be reasonable. For example, the actuary may have decided not to make any assumption with regard to four different types of future events, each of which alone is immaterial. However, the effect of omitting assumptions for all four types of future events may be a material understatement or overstatement of the measurement results. In these circumstances, the assumptions should be revised.
- 3.10.5 Changes in Circumstances—The **demographic assumptions** selected should reflect the actuary’s knowledge as of the **measurement date**. However, the actuary may learn of an event occurring after the **measurement date** (for example, plan termination or death of the principal owner), that would have changed the actuary’s selection of a **demographic assumption**. If appropriate, the actuary may reflect this change as of the **measurement date**.
- 3.10.6 Views of Experts—Demographic data and analyses are available from a variety of sources, including representatives of the plan sponsor and administrator, demographers, economists, and other professionals. When the actuary is responsible for selecting or giving advice on selecting **demographic assumptions** within the scope of this standard, the actuary may incorporate the views of

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experts, but the selection or advice should reflect the actuary's professional judgment.

Section 4. Communications and Disclosures

4.1 Communications—Any actuarial report prepared to communicate the results of work subject to this standard should contain the following disclosures with respect to **demographic assumptions**:

4.1.1 Assumptions Used—The actuary should describe each significant **demographic assumption** used in the measurement and whether the assumption represents an estimate of future experience, the actuary's observation of the estimates inherent in market data, or a combination thereof. Sufficient detail should be shown to permit another qualified actuary to assess the level and pattern of each assumption (for example, by supplying the name of a published decrement table or by showing turnover rates at every fifth age for an unpublished age-based table).

The disclosure of the mortality assumption should contain sufficient detail to permit another qualified actuary to understand the provision made for future mortality improvement. If the actuary assumes zero mortality improvement after the **measurement date**, the actuary should state that no provision was made for future mortality improvement.

The description should also include a disclosure of any explicit adjustment made in accordance with section 3.10.1. for adverse deviation or for valuing plan provisions that are difficult to measure as discussed in ASOP No. 4.

4.1.2 Rationale for Assumptions—The actuary should disclose the information and analysis used in selecting each **demographic assumption** that has a significant effect on the measurement. The disclosure may be brief but should be pertinent to the plan's circumstances. For example, the actuary may disclose any specific approaches used, sources of external advice, and how past experience and future expectations were considered. The disclosure may reference any actuarial experience report or study performed, including the date of the report or study. This section is not applicable to **prescribed assumptions or methods set by another party** or **prescribed assumptions or methods set by law**.

4.1.3 Changes in Assumptions—The actuary should disclose any changes in the significant **demographic assumptions** from those previously used for the same type of measurement. The general effects of the changes should be disclosed in words or by numerical data, as appropriate. For situations in which both the

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demographic assumptions and economic assumptions have changed from those previously used for the same type of measurement, the actuary may disclose the general effects of the changes separately or combined, as appropriate.

For each assumption that is neither a **prescribed assumption or method set by another party** nor a **prescribed assumption or method set by law**, the actuary should include an explanation of the information and analysis that led to the change.

The disclosure may be brief but should be pertinent to the plan's circumstances. The disclosure may reference any actuarial experience report or study performed, including the date of the report or study.

4.1.4 Changes in Circumstances—The actuary should refer to ASOP No. 41 for communication and disclosure requirements regarding changes in circumstances known to the actuary that occur after the **measurement date** and that would affect **demographic assumptions** selected as of the **measurement date**.

4.2 Disclosure about Prescribed Assumptions or Methods—The actuary's communication should state the source of any prescribed assumptions or methods.

With respect to **prescribed assumptions or methods set by another party**, the actuary's communication should identify the following, if applicable:

- a. any **prescribed assumption or method set by another party** that significantly conflicts with what, in the actuary's professional judgment, would be reasonable for the purpose of the measurement (section 3.8); or
- b. any **prescribed assumption or method set by another party** that the actuary is unable to evaluate for reasonableness for the purpose of the measurement (section 3.8).

4.3 Additional Disclosures—The actuary should also include the following, as applicable, in an actuarial communication:

- a. the disclosure in ASOP No. 41, section 4.3, if the actuary states reliance on other sources and thereby disclaims responsibility for any material assumption or method set by a party other than the actuary; and
- b. the disclosure in ASOP No. 41, section 4.4, if, in the actuary's professional judgment, the actuary has otherwise deviated materially from the guidance of this ASOP.

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- 4.4 Confidential Information—Nothing in this standard is intended to require the actuary to disclose confidential information.

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Appendix

Comments on the First Exposure Draft and Responses

The first exposure draft of this proposed revision of this ASOP, *Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations*, was issued in September 2013 with a comment deadline of January 31, 2014. Six comment letters were received. Some of the letters were submitted on behalf of multiple commentators, such as by firms or committees. For purposes of this appendix, the term “commentator” may refer to more than one person associated with a particular comment letter. The Pension Committee carefully considered all comments received, and the ASB reviewed (and modified, where appropriate) the proposed changes.

Summarized below are the significant issues and questions contained in the comment letters and the responses to each. Also, unless otherwise noted, the section numbers and titles used in this appendix refer to those in the first exposure draft.

GENERAL COMMENTS	
Comment	One commentator suggested that the Actuarial Standards Board (ASB) initiate a new project that substantially improves the level of coordination of guidance that is currently provided by the individual ASOPs applicable to the pension and retiree group benefit practice areas.
Response	The reviewers appreciate the suggestion and will take it under consideration in the future.
SECTION 1. PURPOSE, SCOPE, CROSS REFERENCES, AND EFFECTIVE DATE	
Section 1.1, Purpose	
Comment	One commentator suggested that it may not be clear how the guidance in ASOP No. 35, <i>Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations</i> , applies to retiree group benefit obligations since all the references in the standard are to “pension plans.”
Response	The reviewers appreciate the comment, but direct the commentator to ASOP No. 6, <i>Measuring Retiree Group Benefits Obligations and Determining Retiree Group Benefits Program Periodic Costs or Actuarially Determined Contributions</i> , for further guidance on retiree group benefit obligations. The reviewers also believe that the guidance is clear and, therefore, made no change.
SECTION 2. DEFINITIONS	
Section 2.6, Prescribed Assumption or Method Set by Another Party	
Comment	One commentator suggested that the concept of a prescribed method may be confusing to some actuaries since it is unclear to what the term “method” applies.
Response	The reviewers believe that the guidance provided is appropriate and consistent with other pension ASOPs and made no change.
Section 2.7, Prescribed Assumption or Method Set by Law	
Comment	One commentator suggested that the concept of a prescribed method may be confusing to some actuaries since it is unclear to what the term “method” applies.
Response	The reviewers believe that the guidance provided is appropriate and consistent with other pension ASOPs and made no change.

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SECTION 3. ANALYSIS OF ISSUES AND RECOMMENDED PRACTICES	
Section 3.1, Overview	
Comment	Two commentators suggested that the term “may” should be changed in the second-to-last sentence of the section. One of the two commentators suggested that the last sentence of the section be deleted because this sentence might be read to imply that alternative scenarios are required when there are multiple reasonable assumptions.
Response	The reviewers agree and made the suggested changes.
Section 3.3.2, Consider the Relevant Assumption Universe	
Comment	One commentator suggested that the expectations of the plan sponsor be explicitly included in the sources of information list.
Response	The reviewers agree and added language to include this source of information as well as relevant information from other sources.
Comment	One commentator suggested that the guidance regarding one-time events discussed in this section and section 3.3.4 be more thorough.
Response	The reviewers believe that the guidance provided is appropriate and sufficient, and made no change.
Comment	One commentator suggested that recent economic events or plan design considerations may have influenced actual observed experience and that the guidance should make it clear that the actuary should consider the extent to which the actual observed experience is an appropriate predictor of future experience.
Response	The reviewers believe that the guidance provided is appropriate and sufficient, and made no change.
Section 3.3.5, Select a Reasonable Assumption	
Comment	One commentator suggested that the assessment of reasonability for an assumption be limited to assumptions that are significant. The commentator recognized that section 3.10.2, Materiality, arguably could be read to imply this guidance, but believes the guidance should be clarified in section 3.3.5. In addition, the commentator suggested that a less stringent reasonability framework may be included for non-significant assumptions.
Response	The reviewers note that section 3.10.2 is applicable to the entire standard and believe that no further guidance is necessary in section 3.3.5.
Comment	One commentator suggested that the consideration of historical and current data be limited to that which the actuary believes is relevant.
Response	The reviewers note that relevance is determined by the actuary’s professional judgment and, therefore, made no change.
Comment	One commentator suggested that the example included in section 3.3.5(a) of the current version of ASOP No. 35 be reinserted into the final version of the ASOP.
Response	The reviewers note that the section in which the example resided no longer exists. In addition, the reviewers note that the removal of this example does not imply that it is no longer valid. The reviewers also note that one of the factors affecting assumption format specification in section 3.3.3 includes the size of the covered population. Therefore, the reviewers made no change.

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Section 3.5, Specific Considerations	
Comment	One commentator suggested the inclusion of specific considerations in the subsections of this section for the selection of demographic assumptions when performing a retiree group benefit obligation measurement.
Response	The reviewers believe that no additional guidance is needed given the guidance provided in ASOP No. 6, and, therefore, made no change.
Section 3.5.1, Retirement; and Section 3.5.2, Termination of Employment	
Comment	Two commentators suggested that the consideration listed in section 3.5.2(a) could also be included as a consideration for the retirement assumption.
Response	The reviewers agree and included the consideration listed in section 3.5.2(a) as a consideration in section 3.5.1.
Comment	One commentator suggested that general economic conditions may also affect retirement and termination assumptions in the short term.
Response	The reviewers agree that general economic conditions may affect demographic assumptions and note that section 3.3.2(c) includes economic conditions when giving consideration to the relevant assumption universe. Therefore, no change was made.
Section 3.5.3, Mortality and Mortality Improvement	
Comment	One commentator suggested that the wording in this section be more even-handed regarding assumptions about mortality improvement.
Response	The reviewers believe that the guidance strikes an appropriate balance and, therefore, made no change.
Section 3.7, Consistency among Demographic Assumptions Selected by the Actuary for a Particular Measurement	
Comment	One commentator suggested that guidance may be included in this section to address consistency across multiple benefit plan measurements.
Response	The reviewers agree and included guidance indicating that the actuary should review the assumptions for consistency with demographic assumptions used for measurements of different benefit plans covering the same covered group, if that information is available to the actuary. To the extent the actuary determines that inconsistencies exist, the actuary should determine whether those inconsistencies are reasonable and make adjustments where appropriate.
Section 3.10.1, Adverse Deviation or Plan Provisions That Are Difficult to Measure	
Comment	One commentator suggested that the guidance be clarified to indicate that only an explicit adjustment triggers the disclosure requirement in section 4.1.1.
Response	The reviewers note that the disclosure requirement is in section 4 and only pertains to explicit adjustments and, therefore, made no change.

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Section 3.10.2, Materiality	
Comment	One commentator noted the change to the guidance in the Exposure Draft from “the actuary should establish an appropriate balance between refined methodology and materiality” to “the actuary should consider the balance between refined assumptions and materiality.” The commentator suggested the former language was more appropriate.
Response	The reviewers believe that the language is clear and note that the guidance provided in this section is the same as the guidance provided in ASOP No. 27, <i>Selection of Economic Assumptions for Measuring Pension Obligations</i> . Therefore, no change was made.
Section 3.10.3, Cost of Using Refined Assumptions	
Comment	Two commentators suggested that this section seems redundant and might better be combined with section 3.10.2, or at least more clearly distinguished from 3.10.2.
Response	The reviewers modified the language to make it parallel with the guidance provided in ASOP No. 27.
SECTION 4. COMMUNICATIONS AND DISCLOSURES	
Section 4.1.1, Assumptions Used	
Comment	Two commentators suggested clarification of the term “market data” in the context of demographic assumptions.
Response	The reviewers note that practice is evolving in the pension area and that the language in the ASOP was intended to allow flexibility in responding to developing markets, and made no change.
Section 4.1.2, Rationale for Assumptions	
Comment	One commentator believed that neither the exposure draft nor ASOP No. 1, <i>Introductory Actuarial Standard of Practice</i> , defines “significant” in a way that would be useful in interpreting this section and suggested that this section include a specific statement that the actuary should use his or her professional judgment in determining which demographic assumptions have “a significant effect on the measurement.”
Response	The reviewers note that the determination of significance requires the actuary’s professional judgment and believe this is consistent with ASOP No. 1 and, therefore, made no change.
Comment	One commentator suggested that the guidance be clarified with regard to prescribed assumptions or methods set by another party.
Response	The reviewers believe that the guidance is clear and, therefore, made no change.
Comment	One commentator suggested that this section specifically permit reference to a non-public document for an explanation of the rationale for assumptions.
Response	The reviewers note that the guidance provided does not restrict the type of document that may be referenced and, therefore, made no change.
Section 4.1.3, Changes in Assumptions	
Comment	One commentator suggested clarifying the guidance to indicate that an actuary is not required to disclose the general effects of the changes of demographic and economic assumptions separately if both sets of assumptions are changed.
Response	The reviewers agree and modified the language to indicate that a disclosure of the general effects of the changes of demographics and economic assumptions may be combined or separate.

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Comment	One commentator suggested including guidance to assist the actuary in determining if a change in assumptions was significant.
Response	In addition, the commentator suggested the inclusion of an appendix that would provide examples of acceptable formats for the disclosures required by section 4.1.3. The reviewers believe that the actuary’s professional judgment determines whether a change in assumptions is significant and, therefore, made no change. The reviewers believe that providing a sample format for disclosure is outside of the scope of this ASOP and, therefore, made no change.
Comment	One commentator suggested that the disclosure requirement of this section be limited to significant changes in demographic assumptions.
Response	The reviewers modified the proposed language to clarify that the disclosure is applicable to any change in a significant demographic assumption. The reviewers disagree with the commentator’s suggestion that the disclosure requirement be limited to significant changes in assumptions.
Comment	One commentator suggested that the term “demographic assumptions” in the first sentence be bolded for style consistency.
Response	The reviewers agree and made the change.
Comment	One commentator suggested that the guidance be clarified with regard to prescribed assumptions.
Response	The reviewers agree and clarified the language.
Comment	One commentator suggested that this section specifically permit reference to a non-public document for an explanation of the information and analysis that led to a change in assumptions.
Response	The reviewers note that the guidance provided does not restrict the type of document that may be referenced and, therefore, made no change.
Section 4.1.4, Changes in Circumstances	
Comment	One commentator suggested that this section include a statement that directly acknowledges that, in many cases, reflecting such changes in circumstances as of the measurement date is not appropriate in the context of the measurement.
Response	The reviewers do not believe additional guidance beyond that which is included in ASOP No. 41 is necessary and, therefore, made no change.
Section 4.4, Confidential Information	
Comment	Two commentators suggested that this section should include a statement that the Principal is the party who determines what is confidential or what the actuary may disclose.
Response	The reviewers note that, for purposes of this standard, confidential information has the same meaning as it does in the <i>Code of Professional Conduct</i> . Therefore, no change was made.