

Comment #1 – 7/26/13 – 3:32 p.m.

Based on my initial read of the ASOP 8 exposure draft, my comments are below:

- In item 1.2 of Scope; health filings are defined in section 2.4 not 2.5.
- In item 2.1 in the definition of Filing Actuary, there is reference to 2.9 and it should be 2.7.
- I think the Reviewing Actuary should change to become the Regulatory Reviewing Actuary. The Regulatory Reviewing Actuary should be defined as in 2.7 of the Exposure Draft.
- I think that there should be a definition for Reviewing Actuary and is defined as an actuary who is responsible for reviewing a health filing on behalf of the health plan issuer. This includes actuaries employed by the health plan issuer and consulting actuaries. (There seems to be a trend of health plan issuers obtaining independent review of health filings by an actuary either employed by the health plan issuer or by a consulting actuary. I believe this to be a different role than a peer review.)

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