

Comment #10 -5/12/14 – 1:29 p.m.

Several references are made throughout the ASOP that an actuary “should”, or “should consider”. This is common for all ASOP’s. Perhaps ASB could address to what extent an actuary “should consider”? For example, perhaps the ASB could develop guidance saying instead of “should consider” rather “must not ignore and must document omission of” or something providing similar guidance.

Definitions:

- 2.1 Perhaps should refer to 42 CFR 438.6 (c) , then should explain what each of the general terms means to the ASB. For example, what does “appropriate” mean in context of the regulation and the ASOP?
- 2.10 What is “GME” and “IME”?
- 2.12 Where is “Performance Withheld” used?

- 3.2.7 f. Not sure if a definition might be useful, as this paragraph seems circular.

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