

Comment #5 – 3/31/15 -11:41 a.m.

Please see my response to the questions posed on page iv of the Exposure Draft:

1. I think the guidance is appropriate.
2. I believe the scope in section 1.2 on page 1 makes it clear that the ASOP applies only to the calculation of actuarial value as required by the ACA.
3. Actually the descriptors AVC-AV and MVC-AV are in sections 2.3 and 2.8 respectively, not 2.2 and 2.7. I think the descriptors add clarity, although I don't think they are necessary.
4. I think the guidance is sufficient.
5. I think a more accurate title would be Determining Actuarial Value and Testing Minimum Value Requirements of the Affordable Care Act. This would be consistent with the purpose stated in section 1.1 and the scope stated in section 1.2 on page 1.
6. I believe the detail for certification in section 4 is appropriate.

Sincerely,

Kelly McKeethan, FCAS, MAAA, CERA