

**Comment #4 – 1/29/15 – 4:36 p.m.**

This is very informal, but hope it suffices and may overlap what ASPPA submits as well. I have two concerns and suggested changes:

4.4 Actuarial Valuation Results—In addition to the items described in section 4.3, the actuary’s communication of **actuarial valuation** results should include at least the following information:

- a. the **measurement date**;
- b. a description of the **allocation method if any** , including the **allocation date** and **allocation period**; a description of the benefit being allocated (for example, the vested accrued benefit, the accrued benefit, the employer-provided benefit, or projected **retirement plan** benefits); a description of the allocation procedure and the unit of measure (for example, fractional rule, based on years of employment); a description of the allocation of **age- or service-dependent benefits**; and a description of any adjustments made to reflect limits on benefit accruals or varying benefit accrual rates under the benefit formula;

...

- d. a description of each actuarial assumption and ~~a the~~ rationale for the selection of each significant assumption that is not prescribed;

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The part (b) change refers to the fact that you may be asked to determine a value and not opine on the split of the benefit. You could also add the option to say the allocation was already done and not part of the assignment.

Part (d) is a concern that if you must provide “the” rationale then you would be precluded from additional comments if testifying – ie the opposing council could say doesn’t your ASOP require that you disclose “the” rational, and now you are telling us that you hid some of the rationale... In actuality, once you know the numbers are being litigated you may expand your “rational/defense of position” for your assumptions vs the opposing set of assumptions that were not necessarily known when you wrote your report. And if you need to write a complete analysis of all possibilities in anticipation of adversarial testimony, it would add considerable cost to a standard report that may not be cost justified.

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