DUTCH STANDARD OF ACTUARIAL PRACTICE 1

(DSAP 1)

General Actuarial Practice

Classificatie:

Aanwijzingen AG-Commissie Kwaliteitszorg op basis van ISAP1 Opgesteld door:

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TABLE OF CONTENTS

Section	1. General	3
1.1	Purpose	3
1.2	Scope	3
1.3	Compliance	3
1.4	Applicability	3
1.5	Reasonable Judgment	4
1.6	Language	5
1.7	Cross-References	5
1.8	Effective Date	5
Section	2. Appropriate Practices	6
2.1	Acceptance of Assignment	6
2.2	Knowledge of Relevant Circumstances	6
2.3	Reliance on Others	6
2.4	Materiality	8
2.10.	Model Governance	8
2.5	Data Quality	10
2.7	Assumptions and Methodology	11
2.7	Assumptions and Methodology Set by Actuary	11
2.8	Assumptions and Methodology Prescribed	12
2.9	Assumptions and Methodology Mandated by Law	13
2.11	Peer Review	13
2.12	Treatment of Subsequent Events	13
2.13	Retention of Documentation	13
Section	3. Communication	14
3.1	General principles.	14
3.2	Report	14

General

- **1.1. Purpose** This DSAP provides guidance to <u>actuaries</u> when performing <u>actuarial services</u> to give <u>intended users</u> confidence that
 - Actuarial services are carried out professionally and with due care;
 - The results are relevant to their needs, are presented clearly and understandably, and are complete; and
 - The assumptions and methodology (including, but not limited to, <u>models</u> and modelling techniques) used are disclosed appropriately.

1.2. Scope

- 1.2.1. This DSAP is a general standard. It applies to all <u>actuarial services</u> performed by an <u>actuary</u> unless an element of guidance is explicitly superseded by another standard such as a practice-specific standard or by law.
- 1.2.2. Usually, the intent of a practice-specific standard is to narrow the range of practice considered acceptable under the general standards. In exceptional cases, however, the intent of a practice-specific standard is to define as acceptable a practice that would not be acceptable under the general standards, in which case that intent is specifically noted by words in a practice-specific standard like: "Notwithstanding the general standards, the actuary should . . .", followed by a description of the exception.
- **1.3. Compliance** –An <u>actuary</u> may fail to follow the guidance in an DSAP but still comply with it where the <u>actuary</u>:
 - 1.3.1. Complies with requirements of law that conflict with the DSAP;
 - 1.3.2. Complies with requirements of the actuarial code of professional conduct applicable to the work that conflict with the DSAP; or
 - 1.3.3. Departs from the guidance in the DSAP and provides, in every <u>communication</u> to which it is relevant, an appropriate statement with respect to the nature, rationale, and effect of any such departure if the guidance is expressed as "should". If the guidance is expressed as "must", the <u>actuary</u> may not depart from it unless 1.3.1 or 1.3.2 apply.
- **1.4. Applicability** DSAP 1 provides guidance to <u>actuaries</u> on general actuarial practice when performing all <u>actuarial services</u>. Other DSAPs do not repeat the general guidance provided in DSAP 1. Hence, compliance with DSAP 1 is a prerequisite to compliance with all other DSAPs. References in DSAP 1 to "this DSAP" should be interpreted as applying equally to all other DSAPs, where appropriate. An <u>actuary</u> who is performing these <u>actuarial services</u> may be acting in one of several capacities such as an employee, management, director, external adviser, auditor, or supervisory authority.

- 1.4.1. The application of the DSAP is clear when a single consulting <u>actuary</u> is performing <u>actuarial services</u> for a client who is not affiliated with the <u>actuary</u>.
- 1.4.2. There are at least two general cases that do not meet the criterion stated in 1.4.1:
 - a. An <u>actuary</u> performing <u>actuarial services</u> is a member of a team including when the team contains non-actuaries; or
 - b. An <u>actuary</u> is performing <u>actuarial services</u> for an affiliated party (such as the <u>actuary</u>'s employer or affiliated entities within a group under common control).
- 1.4.3. When a team is performing <u>actuarial services</u> with more than one <u>actuary</u> on the team, most paragraphs of the DSAP apply to every <u>actuary</u> on the team. However, requirements in some paragraphs need not be met by every <u>actuary</u> on the team personally (e.g., 2.1.1). In the case of such paragraphs, each <u>actuary</u> on the team should identify, if relevant to that <u>actuary</u>'s <u>work</u>, which member of the team is responsible for complying with such requirements and be satisfied that the other team member accepts that responsibility.
- 1.4.4. If an <u>actuary</u> is performing <u>actuarial services</u> for an affiliated party, the <u>actuary</u> should interpret the DSAP in the context of practices that apply normally within or in relation to the affiliated party, except that, if there are substantive inconsistencies between these practices and the DSAP, the <u>actuary</u> should endeavour to observe the spirit and intent of the DSAP as fully as possible.
 - a. The <u>actuary</u> should consider the expectations of the <u>principal</u>. These expectations might suggest that it may be appropriate to omit some of the otherwise required content in the <u>report</u>. However, limiting the content of a <u>report</u> may not be appropriate if that <u>report</u> or the findings in that <u>report</u> may receive broad distribution.
 - b. If the <u>actuary</u> believes circumstances are such that including certain content in the <u>report</u> is not necessary or appropriate, the <u>actuary</u> should be prepared (if challenged by a professional actuarial body with jurisdiction over the <u>actuarial services</u>) to describe these circumstances and provide the rationale for limiting the content of the <u>report</u>.
- **1.5. Reasonable Judgment** The <u>actuary</u> should exercise reasonable judgment in applying any DSAP.
 - 1.5.1. A judgment is reasonable if it takes into account:
 - a. The spirit and intent of the DSAPs;
 - b. The type of assignment; and
 - c. Appropriate constraints on time and resources.
 - 1.5.2. Nothing in an DSAP should be interpreted as requiring work to be performed that is not proportionate to the scope of the decision or the assignment to which it relates and the benefit that <u>intended users</u> would be expected to obtain from the <u>work</u>. ("Principle of Proportionality")

1.5.3. Any judgment required by the DSAP (including implicit judgment) is intended to be the actuary's professional judgment unless otherwise stated.

1.6. Language

- 1.6.1. Some of the language used in all DSAPs is intended to be interpreted in a very specific way in the context of a decision of the <u>actuary</u>. In particular, the following verbs are to be understood to convey the actions or reactions indicated:
 - a. "Must" means that the indicated action is mandatory and failure to follow the indicated action will constitute a departure from the DSAP, unless the departure is due to a conflict with law (1.3.1) or code of professional conduct (1.3.2).
 - b. "Should" (or "shall") means that, under normal circumstances, the <u>actuary</u> is expected to follow the indicated action, unless to do so would produce a result that would be inappropriate or would potentially mislead the <u>intended users</u> of the <u>actuarial services</u>. If the indicated action is not followed, the <u>actuary</u> should disclose that fact and provide the reason for not following the indicated action as described in paragraph 1.3.3.
 - c. "May" means that the indicated action is not required, nor even necessarily expected, but in certain circumstances is an appropriate activity, possibly among other alternatives. Note that "might" is not used as a synonym for may, but rather with its normal meaning.
- 1.6.2. DSAPs use various terms whose specific meanings are defined in the Glossary. These terms are highlighted in the text with a dashed underscore and in blue, which is also a hyperlink to the definition (e.g., <u>actuary</u>).
- 1.7. Cross-References When an DSAP refers to the content of another document, the reference relates to the referenced document as it is effective on the <u>adoption date</u> as shown on the cover page of the DSAP. If the referenced document is amended or, restated after the <u>adoption date</u> of the DSAP, the <u>actuary</u> must consider the extent to which the guidance in the DSAP is still applicable and appropriate.
- **1.8. Effective Date** This DSAP is effective for <u>actuarial services</u> commenced on or after 1-1-2020.

Section 2. Appropriate Practices

2.1. Acceptance of Assignment

- 2.1.1. When providing <u>actuarial services</u>, the <u>actuary</u> should confirm with the <u>principal</u> the nature and scope of <u>actuarial services</u> to be provided, including:
 - a. The role of the principal;
 - b. Any limitations or constraints on the actuary;
 - c. Any requirements that the actuary is required to satisfy;
 - d. Identification of the schedule and expected cost or resources needed (especially if they are substantial); and
 - e. The information needed to be communicated to and by the <u>actuary</u>, especially if it is sensitive or confidential.
- 2.1.2. In accepting an assignment for <u>actuarial services</u>, the <u>actuary</u> shall:
 - a. Be competent and appropriately experienced to perform the services¹;
 - b. Be satisfied that the assignment can be performed under the applicable code of professional conduct; and
 - c. Have reasonable assurance of time, resources, access to relevant employees and other relevant parties, access to documentation and information, and the right of the <u>actuary</u> to communicate information, as may be necessary for the <u>work</u>.
- **2.2. Knowledge of Relevant Circumstances** The <u>actuary</u> should have or obtain sufficient knowledge and understanding of the <u>data</u> and other information available, including the relevant history, processes, nature of the business operations, <u>law</u>, and business environment of the subject of the <u>actuarial services</u>, to be appropriately prepared to perform the <u>actuarial services</u> required by the assignment.
- **2.3. Reliance on Others** The <u>actuary</u> may use information prepared by another party. This information may include <u>data</u> and opinions of other professionals, and supporting analyses (but excludes assumptions and methodology). The <u>actuary</u> may select the party and information on which to rely, or may be given the information by the <u>principal</u>. The <u>actuary</u> may take responsibility for such information, or the <u>actuary</u> may state that reliance has been placed upon the source of this information and disclaim responsibility.
 - 2.3.1. If the <u>actuary</u> selects the party on whom to rely, the <u>actuary</u> should consider the following:

¹Adopting standard-setter to choose one of these two phrases as appropriate, insert the name of the qualification standard if applicable, and delete material between the {}.

- a. The other party's qualifications;
- b. The other party's competence, integrity, and objectivity;
- c. The other party's awareness of how the information is expected to be used;
- d. Discussions and correspondence between the <u>actuary</u> and the other party regarding any facts known to the <u>actuary</u> that are likely to have a material effect upon the information used; and
- e. The need to review the other party's supporting documentation.
- 2.3.2. If the <u>actuary</u> uses information prepared by another party without disclaiming responsibility for that information, the <u>actuary</u>:
 - a. Should determine that the use of that information conforms to accepted actuarial practice in the jurisdiction(s) of the actuary's services;
 - b. Should establish appropriate procedures for the management and review of the information that the <u>actuary</u> intends to use; and
 - c. Does not need to disclose the source of the information.
- 2.3.3. If the <u>actuary</u> states reliance on the information prepared by another party and disclaims responsibility for it, the <u>actuary</u> should:
 - a. Disclose that fact (including identifying the other party) in every communication to which it is relevant;
 - b. Disclose the nature and extent of such reliance;
 - c. Examine the information for evident shortcomings;
 - d. When practicable, review the information for reasonableness and consistency; and
 - e. Report the steps, if any, that the <u>actuary</u> took to determine whether it was appropriate to rely on the information.
- 2.3.4. If the information was prepared by the other party under a different jurisdiction, the actuary should consider any differences in the <u>law</u> or accepted actuarial practice between the two jurisdictions and how that might affect the actuary's use of the information.

- **2.4. Materiality** In case of omissions, understatements, or overstatements, the <u>actuary</u> should assess whether or not the effect is material. The threshold of materiality under which the <u>work</u> is being conducted should be determined by the <u>actuary</u> unless it is imposed by another party such as an auditor or the <u>principal</u>. When determining the threshold of materiality, the <u>actuary</u> should:
 - 2.4.1. Assess materiality from the point of view of the <u>intended user(s)</u>, recognizing the purpose of the <u>actuarial services</u>; thus, an omission, understatement, or overstatement is material if the <u>actuary</u> expects it to affect significantly either the <u>intended user</u>'s decision-making or the <u>intended user</u>'s reasonable expectations;
 - 2.4.2. Consider the actuarial services and the subject of those actuarial services; and
 - 2.4.3. Consult with the principal if necessary.
- **2.5. Model Governance** This paragraph applies to all <u>models</u> that support entity's decision making. It provides guidance to <u>actuaries</u> on appropriate <u>model governance</u> to manage the risks inherent in using a <u>model. Model governance</u> is important for all <u>models</u>, from those using simple spreadsheets to those including complex simulations. The level of governance should be proportionate to the risk to the <u>intended users</u> as a result of an incorrect conclusion being drawn from the results of the <u>model</u>.

The actuary involved in selecting, modifying, developing, or using models should:

- 2.5.1. a. Be satisfied that there is in place an appropriate model risk management framework that addresses identification of model risks, assessment of these risks, and appropriate actions to mitigate these risks such as adequate model validation, documentation, and process controls.
 - b. Be satisfied that an appropriate model validation has taken place. For the purpose of this DSAP, validation includes assessments that:
 - The <u>models</u> reasonably fits its intended purpose. Items that the <u>actuary</u> should consider, if applicable, include the availability, granularity, and quality of <u>data</u> and inputs required by the <u>models</u>, the appropriateness of the relationships recognized, and the <u>model</u>'s ability to generate an appropriate range of results around expected values.
 - The model meets its specifications.
 - The results of the model can be appropriately reproduced.

The validation should be performed by individual(s) who did not develop the <u>model</u>, unless to do so imposes a burden that is disproportionate to the <u>model risk</u>.

- c. Understand the context in which the <u>model</u> will be used, how model input will be provided, and how the <u>actuary</u> expects the results of the <u>model</u> will be used.
- 2.5.2. Selecting an Existing Model The actuary who selects an existing model (whether developed in-house or by a third party) should:
 - a. Understand the model.

- b. Understand the conditions under which it is appropriate for the model to be used, including any limitations of the model.
- c. Be satisfied that there is adequate documentation of the model construction and operation (including where appropriate scope, purpose, methodology, statistical quality, calibration, and fitness for intended purpose), and of the conditions under which it is appropriate to use the model, including any limitations of the model.
- 2.5.3. Modifying an Existing Model The actuary who modifies an existing model should:
 - a. Understand the model.
 - b. Document, as appropriate, the changes made to, and any material impact of the changes on, the model's scope, purpose, methodology, statistical quality, calibration, fitness for intended purpose, and conditions under which it is appropriate to use the model, including any limitations of the model.
 - c. Be satisfied that an appropriate change control process is in place for the model. A change control process avoids unauthorized changes to the model, documents any changes made, and allows any changes to be reversed.
- 2.5.4. Developing a New Model The actuary who develops a new model should:

Document, as appropriate, the model design, construction, and operation (including where appropriate scope, purpose, methodology, statistical quality, calibration, and fitness for intended purpose), and conditions under which it is appropriate to use the model, including any limitations of the model.

- 2.5.5. Using a Model The actuary who uses a model should:
 - a. Understand the model.
 - b. Be satisfied that the conditions to use the model are met.
 - c. Be satisfied that there are appropriate controls on inputs and outputs of the model.
 - d. Consider whenever the model is used, whether the validation described in 2.5.1.b should be redone in whole or in part.
 - e. Understand and, if appropriate, explain material differences between different runs of the model, and be satisfied that there is an adequate control process for production runs. In the case of stochastic models, be satisfied that a sufficient number of runs of the model are made, and understand the material differences between different runs of the model.
 - f. Understand management actions or responses assumed within the model and consider whether any changes to the model are needed.
 - g. Document, as appropriate, limitations, inputs, key assumptions, intended uses, and model output.

2.6. Data Quality

- 2.6.1. <u>Sufficient and Reliable Data</u> The <u>actuary</u> should consider whether sufficient and reliable <u>data</u> are available to perform the <u>actuarial services</u>. <u>Data</u> are sufficient if they include the appropriate information for the <u>work</u>. <u>Data</u> are reliable if they are substantially accurate. If sufficient and reliable <u>data</u> are not available, then the <u>actuary</u> should follow the guidance in paragraph 2.5.5. below.
- 2.6.2. <u>Review</u> The <u>actuary</u> should take reasonable steps to review the consistency, completeness, and accuracy of the <u>data</u> used. These might include:
 - a. Undertaking reconciliations against audited financial statements, trial balances, or other relevant records, if these are available;
 - b. Testing the <u>data</u> for reasonableness against external or independent <u>data</u>;
 - c. Testing the <u>data</u> for internal consistency and consistency with other relevant information; and
 - d. Comparing the data to those for a prior period or periods.

The actuary should describe this review in the report.

- 2.6.3. Sources of Data for Assumptions To the extent possible and appropriate when setting assumptions, the <u>actuary</u> should consider using <u>data</u> specific to the organization or the subject of the <u>actuarial services</u>. Where such <u>data</u> are not available, relevant, or credible, the <u>actuary</u> should consider industry <u>data</u>, <u>data</u> from other comparable sources, population <u>data</u>, or other published <u>data</u>, adjusted as appropriate. The <u>data</u> used, and the adjustments made, should be described in the <u>report</u>.
- 2.6.4. <u>Data Modification the actuary</u> should disclose in the <u>report</u> any modification of <u>data</u> before its use (such as interpolation, extrapolation, adjustment, or discarding of outliers).
- 2.6.5. <u>Deficiencies in Data</u> The <u>actuary</u> should consider the possible effect of any <u>data</u> deficiencies (such as inadequacy, inconsistency, incompleteness, inaccuracy, and unreasonableness) on the results of the <u>work</u>. If such deficiencies in the <u>data</u> are not likely to materially affect the results, then the deficiencies need not be considered further. If the <u>actuary</u> cannot find a satisfactory way to resolve the deficiencies, then the <u>actuary</u> should consider whether to:
 - a. Decline to undertake or continue to perform the <u>actuarial services</u>;
 - b. Work with the <u>principal</u> to modify the <u>actuarial services</u> or obtain appropriate additional data or other information; or
 - c. Subject to compliance with the <u>actuary</u>'s code of professional conduct, perform the <u>actuarial services</u> as well as possible and disclose the <u>data</u> deficiencies in

the <u>report</u> (including an indication of the potential impact of those <u>data</u> deficiencies).

2.7. Assumptions and Methodology

- 2.7.1. The assumptions and methodology may be
 - a. Set by the actuary (2.7);
 - b. Prescribed by the <u>principal</u> or another party (2.8); or
 - c. Mandated by law (2.9).
- 2.7.2. Where the <u>report</u> is silent about who set an assumption or methodology, the <u>actuary</u> who authored the <u>report</u> will be assumed to have taken responsibility for such assumption or methodology.
- **2.8. Assumptions and Methodology Set by Actuary** Where the <u>actuary</u> sets the assumptions and methodology, or the <u>principal</u> or another party sets an assumption or methodology that the <u>actuary</u> is willing to support:
 - 2.8.1. Selection of Assumptions and Methodology The actuary should select the assumptions and methodology that are appropriate for the work. The actuary should consider the needs of the intended users and the purpose of the actuarial services. In selecting assumptions and methodology, the actuary should consider the circumstances of the organization, the subject of the actuarial services, and the assignment, as well as relevant industry and professional practices. The actuary should consider to what extent it is appropriate to adjust assumptions or methodology to compensate for known deficiencies in the available data.
 - 2.8.2. Appropriateness of Assumptions The actuary should consider the appropriateness of the assumptions underlying each component of the methodology used. Assumptions generally involve significant professional judgment as to the appropriateness of the methodology used and the parameters underlying the application of the selected methodology. Assumptions may (if permitted in the circumstances) be implicit or explicit and may involve interpreting past data and other information or projecting future trends. The actuary should consider to what extent it is appropriate to use assumptions that have a known significant bias to underestimation or overestimation of the result.
 - 2.8.3. <u>Margins for Adverse Deviations</u> In cases where unbiased calculations are not required, the <u>actuary</u> should consider to what extent it is appropriate to adjust the assumptions or methodology with margins for adverse deviations in order to allow for uncertainty in the underlying <u>data</u> and other information, assumptions, or methodology. The <u>actuary</u> should disclose any incorporation of margins for adverse deviations in assumptions or methodology.
 - 2.8.4. <u>Discontinuities</u> The <u>actuary</u> should consider the effect of any discontinuities in experience on assumptions or methodology. Discontinuities could result from:

- a. Internal circumstances regarding the organization or subject of the <u>actuarial</u> <u>services</u> such as changes in an insurer's claims processing or changes in the mix of business; or
- b. External circumstances impacting the organization or subject of the <u>actuarial</u> <u>services</u> such as changes in the legal, economic, legislative, regulatory, supervisory, demographic, technological, and social environments.
- 2.8.5. <u>Individual Assumptions and Aggregate Assumptions</u> The <u>actuary</u> should assess whether an assumption set is reasonable in the aggregate. While assumptions might be justifiable individually, it is possible that prudence or optimism in multiple assumptions will result in an aggregate assumption set that is no longer valid. If not valid, the <u>actuary</u> should make appropriate adjustments to achieve a reasonable assumption set and final result.
- 2.8.6. <u>Internal Consistency of Assumptions</u> The <u>actuary</u> should determine if the assumptions used for different components of the <u>work</u> are materially consistent, and that any significant interdependencies are modelled appropriately. The <u>actuary</u> should disclose any material inconsistency in the <u>report</u>.
- 2.8.7. <u>Alternative Assumptions and Sensitivity Testing</u> The <u>actuary</u> should consider and address the sensitivity of the methodology to the effect of variations in key assumptions, when appropriate. In determining whether sensitivity has been appropriately addressed, the <u>actuary</u> should take into account the purpose of the <u>actuarial services</u> and whether the results of the sensitivity tests reflect a reasonable range of variation in the key assumptions, consistent with that purpose.
- **2.9. Assumptions and Methodology Prescribed** Where the assumptions or methodology are prescribed by the <u>principal</u> or another party:
 - 2.9.1. If the <u>actuary</u> is willing to support the prescribed assumption or methodology (following paragraph 2.7 as applicable), the <u>actuary</u> may disclose the party who prescribed the assumption or methodology and the <u>actuary</u>'s support.
 - 2.9.2. If the <u>actuary</u> is unwilling to support the prescribed assumption or methodology because:
 - a. It significantly conflicts with what would be appropriate for the purpose of the actuarial services; or
 - b. The <u>actuary</u> has been unable to judge the appropriateness of the prescribed assumption or methodology without performing a substantial amount of additional work beyond the scope of the assignment, or the <u>actuary</u> was not qualified to judge the appropriateness of the assumption;
 - then the <u>actuary</u> should disclose in the <u>report</u> that fact, the party who prescribed the assumption or methodology, and the reason why this party, rather than the <u>actuary</u>, set the assumption or methodology.
 - 2.9.3. When the <u>principal</u> requests an additional calculation using an assumption set which the <u>actuary</u> does not judge to be reasonable for the purpose of the <u>actuarial services</u>, the <u>actuary</u> may provide the <u>principal</u> with the results based on such assumptions. If

those results are communicated to any party other than the <u>principal</u>, the <u>actuary</u> should disclose the source of those assumptions and the <u>actuary</u>'s opinion of their appropriateness.

- **2.10. Assumptions and Methodology Mandated by Law** When an assumption or methodology is mandated by <u>law</u>, the <u>actuary</u> should disclose in the <u>report</u> that the assumption or methodology was mandated by <u>law</u> and therefore such assumption or methodology may limit the relevance of the work for other purposes.
- 2.11. Peer Review The actuary should consider to what extent, if at all, it is appropriate for the report to be independently reviewed, in totality or by component, before the final report is delivered to the principal or distributed to the intended users. The purpose of peer review is to ensure the quality of the report, with the process tailored to the complexity of the work and the specific environment in which the actuary works. If a peer review is deemed to be appropriate:
 - 2.11.1. The <u>actuary</u> should select a reviewer who is independent of involvement with the specific component(s) reviewed and is knowledgeable and experienced in the practice area of the <u>actuarial services</u>.
 - 2.11.2. If the reviewer is an <u>actuary</u>, the reviewer should comply with the guidance in this DSAP, as applicable, in performing the review.
- **2.12. Treatment of Subsequent Events** The <u>actuary</u> should consider any <u>subsequent event</u> that has the potential of materially changing the results of the <u>actuarial services</u> if the event had been reflected in the <u>work</u> and disclose such an event in the <u>actuary</u>'s <u>communication</u>.

2.13. Retention of Documentation

- 2.13.1. The <u>actuary</u> should retain, for a reasonable period of time, sufficient documentation for purposes such as:
 - a. Peer review, regulatory review, and audit;
 - b. Compliance with law; and
 - c. Assumption of any recurring assignment by another actuary.
- 2.13.2. Documentation is sufficient when it contains enough detail for another <u>actuary</u> qualified in the same practice area to understand the <u>work</u> and assess the judgments made.
- 2.13.3. Nothing in any DSAP is intended to give any person access to material beyond the access that they are already authorized to have.

Section 3. Communication

- **3.1. General Principles** Any <u>communication</u> should be appropriate to the particular circumstances and take the skills, understanding, levels of relevant technical expertise, and needs of the <u>intended user</u> into consideration to allow the <u>intended user</u> to understand the implications of the <u>actuary</u>'s <u>communication</u>.
 - 3.1.1. <u>Form and Content</u> The <u>actuary</u> should determine the form, structure, style, level of detail, and content of each <u>communication</u> to be appropriate to the particular circumstances, taking into account the <u>intended users</u>.
 - 3.1.2. <u>Clarity</u> The <u>actuary</u> should word each <u>communication</u> to be clear and use language appropriate to the particular circumstances, taking into account the <u>intended users</u>.
 - 3.1.3. <u>Timing of Communication</u> The <u>actuary</u> should issue each <u>communication</u> within a reasonable time period. The timing of the <u>communication</u> should reflect any arrangements that have been made with the <u>principal</u>. The <u>actuary</u> should consider the needs of the <u>intended users</u> in setting the timing.
 - 3.1.4. <u>Identification of the Actuary</u> A <u>communication</u> shall clearly identify the issuing <u>actuary</u>. When two or more individuals jointly issue a <u>communication</u>, at least some of which is actuarial in nature, the <u>communication</u> shall identify all responsible <u>actuaries</u>, unless the <u>actuaries</u> judge it inappropriate to do so. The name of an organization with which each <u>actuary</u> is affiliated also may be included in the <u>communication</u>, but the <u>actuary</u> is responsibilities are not affected by such identification. Unless the <u>actuary</u> judges it inappropriate, any <u>communication</u> shall also indicate to what extent and how supplementary information and explanation can be obtained from the <u>actuary</u> or another party.
- **3.2. Report** The <u>actuary</u> should complete a <u>report</u> unless any <u>intended users</u> will otherwise be adequately informed about the results of <u>actuarial services</u> (including access to the supporting information which is necessary to understand these results). The <u>actuary</u> should present all information with sufficient detail that another <u>actuary</u> qualified in the same practice area could make an objective appraisal of the reasonableness of the <u>actuary</u>'s work.
 - 3.2.1. <u>Content</u> In the <u>report</u>, the <u>actuary</u> should include, if applicable:
 - a. The scope and intended use of the report;
 - b. The results of <u>actuarial services</u>, including the potential variability of these results;
 - c. The methodology, assumptions, and data and other information used;
 - d. Any restrictions on distribution;
 - e. The date of the report; and
 - f. Identification of the authorship of the report.
 - 3.2.2. <u>Disclosures</u> In the <u>report</u>, the <u>actuary</u> issuing the <u>report</u> should disclose, if applicable:
 - a. Any material deviation from the guidance in this DSAP (1.3.3);

- b. Any reliance on information prepared by another party for which the <u>actuary</u> disclaims responsibility (2.3.3);
- c. Disclosures that the actuary considers to be appropriate so that the intended users of the model or its results are able to understand the:
 - i. Limitations and uncertainties, and their implications; and
 - ii. Management actions or responses assumed in the model, and their implications.
- d. Any data review (2.6.2), modification (2.6.4), and deficiencies (2.6.5);
- e. Incorporation of any margins for adverse deviations in assumptions (2.9.2);
- f. Any material inconsistency in the assumptions used (2.9.6);
- g. Assumptions and methodology that have been prescribed by another party which the <u>actuary</u> does not support (2.10);
- h. Assumptions and methodology that are mandated by <u>law</u> (2.11); and

i.

- j. Any material subsequent event (2.14).
- 3.2.3. <u>Authorship</u> The <u>actuary</u> issuing the <u>report</u> should include in the <u>report</u>:
 - a. The actuary's name;
 - b. If applicable, the name of the organization on whose behalf the <u>actuary</u> is issuing the <u>report</u>, and the <u>actuary</u>'s position held;
 - c. The capacity in which the <u>actuary</u> serves;
 - d. The actuary's qualifications;
 - e. The code of professional conduct and actuarial standards under which the work was performed, if there is any possible ambiguity; and
 - f. If applicable, attestations and reliances.
- 3.2.4. Form A report may comprise one or several document(s) that may exist in several different formats. Where a report comprises multiple documents, the actuary should communicate to all intended users which documents comprise the report. The actuary should ensure that report components (especially those in electronic media) are such that they can be reliably reproduced for a reasonable period of time.
- 3.2.5. Constraints The content of a report may be constrained by circumstances such as legal, legislative, regulatory, or supervisory proceedings. Constraints could also include other standards such as financial reporting standards or an organization's accounting policy. The actuary should follow the guidance in the DSAP to the extent reasonably possible within such constraints.