

Academy Webinar: Dodd-Frank Wall Street Reform and Consumer Protection Act

October 5, 2010

Financial Regulatory Reform Task Force



Overview

- Systemic Risk Regulation Framework
- Regulation of Derivatives
- Property and Casualty Industry Reaction and Impacts
- Other Issues of Interest to Actuaries



Participants

- Jesse Schwartz, FSA, MAAA
 - Chairperson, Financial Regulatory Reform Task Force
- Guy Barker, ASA, FIA, MAAA
 - Member, Financial Regulatory Reform Task Force
- Michael Frings, FSA, MAAA
 - Member, Financial Regulatory Reform Task Force
- Orin Linden, FCAS, MAAA
 - Member, Financial Regulatory Reform Task Force
- Marianne Purushotham, FSA, MAAA
 - Member, Financial Regulatory Reform Task Force



Systemic Risk Regulation Framework

Guy Barker ASA, FIA, MAAA

Member, Financial Regulatory Reform Task Force



Systemic Risk Regulation Framework

- FSOC: Financial Stability Oversight Council
- OFR: Office of Financial Research
- FIO: Federal Insurance Office



FSOC

- “... arguably, the most powerful regulatory body in the world” (WSJ)
- Not as a supervisor
- Not as an executive body
- Rather, as an identifier of targets
- And as an instructor to regulators



FSOC Membership

Tim Geithner, Treasury Secretary (Chairperson of the Financial Stability Oversight Council)

■ Voting members:

- Ben Bernanke, Chairman of the Board of Governors of the Federal Reserve System
- John Walsh, Acting Comptroller of the Currency
- Mary Schapiro, Chairman of the U.S. Securities and Exchange Commission
- Sheila Bair, Chairman of the Federal Deposit Insurance Corporation
- Gary Gensler, Chairman of the Commodity Futures Trading Commission
- Edward J. DeMarco, Acting Director of the Federal Housing Finance Agency
- Debbie Matz, Chairman of the National Credit Union Administration
- An additional voting member will be a Presidential appointee with insurance experience

■ Nonvoting official attendees will be

- Director of the OFR
- Director of the FIO
- State representation
 - John M. Huff, Director, Missouri Department of Insurance, Financial Institutions, and Professional Registration
 - William S. Haraf, Commissioner, California Department of Financial Institutions
 - David S. Massey, Deputy Securities Administrator, North Carolina Department of the Secretary of State, Securities Division



FSOC Responsibilities

- **Designate specific companies (including insurance companies) as “systemically important”**
- Instruct Federal Reserve to impose measures to regulate these companies (see next slide)
- Permit the Federal Reserve in extreme cases to order companies to divest assets (or to be broken up)
- Collect information from other regulators (federal and state)
- Identify regulatory gaps
- Identify other threats to US financial stability
- Facilitate cooperation and resolve disputes among regulators
- **Monitor US financial markets: integrity, efficiency and competitiveness**



FSOC Responsibilities: Systematically Important Companies

Systematically important companies, to be identified by the FSOC and to be supervised as such by the Fed, will include

- Automatically, domestic bank holding groups of more than \$50 billion of assets
- Additionally, non-banks and foreign banks determined by a 11 factor test
- Plus, any financial company specifically earmarked by the FSOC

In respect to systemically important companies, FSOC may instruct the Fed to:

- Enforce improved capital requirements
- Require additional provisions for liquidity
- Prepare acceptable formal resolution plans
- Provide credit exposure reports
- Work to Fed defined concentration limits (assets and liabilities both)
- Provide additional public disclosures
- Undergo periodic stress testing
- Establish enhanced risk protocols



FSOC Mechanics

- FSOC will meet periodically, not normally frequently
- FSOC membership is secondary to the members' primary regulatory roles
- Has the OFR (Office of Financial Research) as the full time federal body working for it and providing data and recommendations
- Has the Director of the OFR as a non-voting attendee



FSOC Annual Report to Congress

- Annual report to Congress will include recommendations on:
 - Enhancing Integrity, Efficiency, Competitiveness of US financial markets
 - Promoting market disciplines
 - Maintaining investor confidence



OFR (Office of Financial Research)

- Where the work is done! It is the central administrative body supporting the FSOC
- Housed within the Treasury Department, which will provide most of the staffing
- Expected to be staffed predominantly by secondees from Treasury
- Headed by a Director who
 - Reports directly to the Treasury Secretary
 - Attends FSOC, but does not vote
- **The OFR should, in this Task Force's opinion, contain actuarial expertise of considerable weight**



OFR Duties

- Provide full administrative support for the FSOC
- Provide expertise on systemic risk
- Draft reports to, and for issuance by, the FSOC
- Make recommendations to the FSOC on target companies, regulatory measures, risks and the overall markets
- **Data Center** will collect data from:
 - Member agencies
 - Other agencies, e.g., state agencies
 - Commercial entities
 - Financial entities including the actuarial bodies



OFR Duties (cont'd)

- **Research and Analysis Center** will:
 - Develop and maintain metrics
 - Monitor changes in system-wide risk levels and patterns
 - Evaluate stress tests on organization overseen by member agencies
 - Investigate problems and failures of financial markets
 - Conduct studies on efficacy of policies related to systemic risks
 - Promote best practices for financial risk management



FIO (Federal Insurance Office)

- Is the first (and only) federal insurance body, charged with:
 - National coordination of the insurance sector
 - Identification of system threatening gaps in insurance regulation
 - Identification to the FSOC of any insurer that is systemically relevant
 - Responsibility for US in International insurance regulatory interaction
- Includes Life, P&C. Excludes only health insurance and some minor lines
- Housed within the Treasury Department, who will provide most of the staffing
- Headed by a Director who:
 - Reports directly to the Treasury Secretary
 - Attends FSOC, but does not vote
- **The FIO should also, in this Task Force's opinion, contain actuarial expertise of considerable weight**



FIO Monitoring of Insurance Industry

- Identify gaps in regulation with systemic implications
- Recommend to FSOC insurers as systemically relevant
- Coordinate and develop federal policy on prudential aspects of international insurance
- Advise FSOC and Treasury Secretary on major domestic or international insurance matters
- Monitor extent to which communities and groups are underserved in access to affordable insurance, excluding health insurance.
- Interact with state insurance authorities
 - Consultation on all insurance matters of national importance
 - Consultation on prudential insurance matters of international importance
 - Determination of federal override of state law on issues affecting international competition and regulation
 - Determine state insurance matters to be pre-empted by covered agreements



FIO Reporting

- Annual Report on the state of the US insurance industry and FIO actions
- Special report within 18 months of enactment on modernization of US insurance regulation
 - Systemic risk regulation with respect to insurance companies
 - Relationship between capital and liability standards
 - Standards of liquidity and duration risk
 - Consumer protection, including state regulatory gaps
 - Uniformity in regulations among states
 - Regulation of insurance groups on a consolidated basis
 - International coordination of insurance regulation
 - Cost and benefits of federal regulation across lines of insurance
 - Feasibility of only regulating certain lines at federal level
 - Ability of federal regulation to eliminate or minimize regulatory arbitrage
 - Impact of international regulatory developments on potential federal regulation
 - Breadth and scope of global reinsurance market and its role in supporting (or otherwise) the US insurance industry



Regulation of Derivatives

Michael Frings, FSA, MAAA

Member, Financial Regulatory Reform Task Force



Introduction: Regulation of Derivatives

- The Dodd-Frank Act brings uncertainty
 - To the hedges insurance companies *buy*
 - And the products insurance companies *sell*
 - Highlighted by recent articles from the Financial Times
 - “*Insurers in limbo over swaps: Ambiguity of wording in Dodd-Frank Act, Business to lobby CFTC over concerns*”¹
 - “*New chapter for insurance regulation*”²
 - “*Aiming for a united front on derivatives*”³
- This section overviews Title VII and Title VIII of the Dodd-Frank Act⁴
 - Current derivatives market
 - Changes made by the Dodd-Frank Act
 - Potential impact on insurance companies

¹ 15 September 2010 p. 15

² 15 September 2010 p. 16

³ 16 September 2010 p. 24

⁴ www.sec.gov/about/laws/wallstreetreform-cpa.pdf

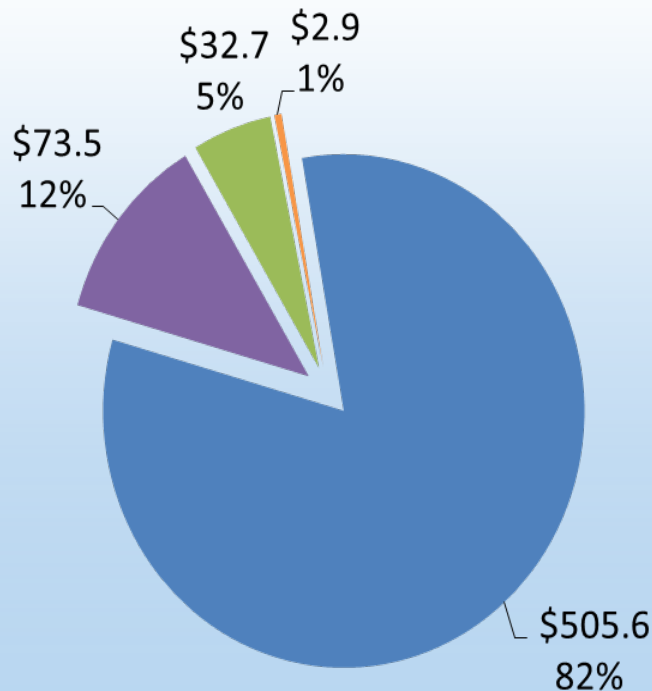


OTC Derivatives Market Size

(as of December 2009)

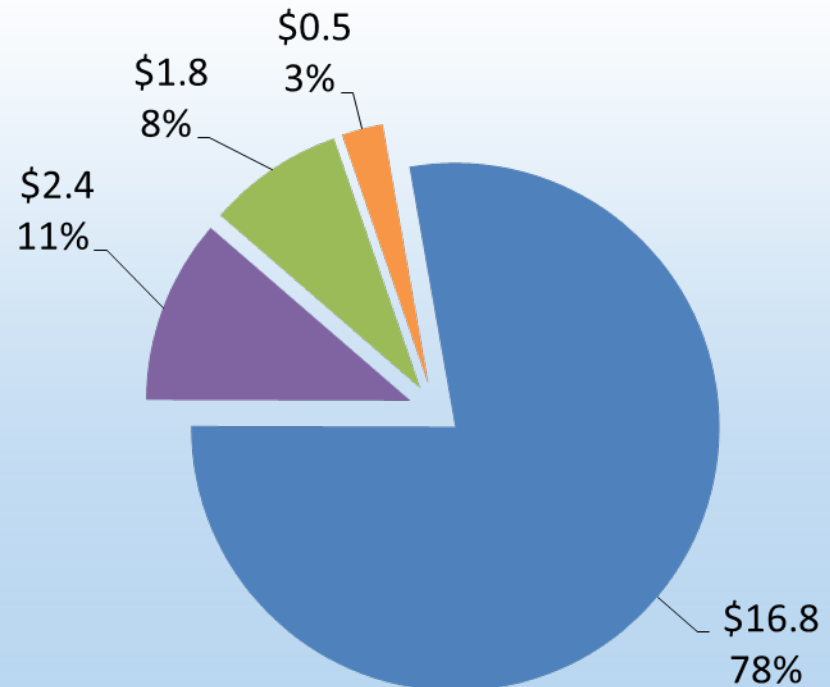
OTC Notional Amount

(in trillions)



OTC Market Value

(in trillions)



■ Interest Rate, FX & Equity Linked ■ Unallocated ■ Credit Default Swaps ■ Commodity Contracts

Source: Bank of International Settlements

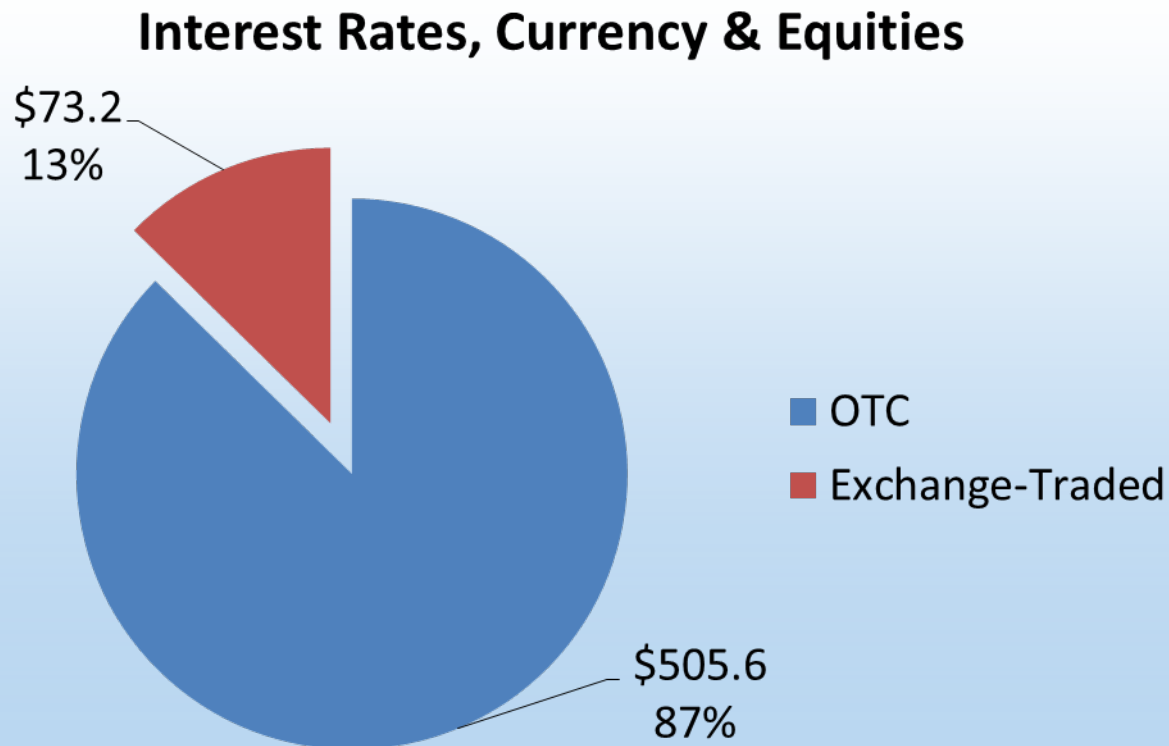


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OTC vs. Exchange-Traded

(as of December 2009)



Source: Bank of International Settlements



Regulation of Derivatives

- Titles VII & VIII of the Dodd-Frank Act regulate OTC derivatives and are among the most far reaching set of statutory changes in the Act.
- Prior to the Dodd-Frank Act, only EXCHANGE-TRADED derivatives were regulated by the Commodity Futures Trading Commission (CFTC) and SEC
 - SEC – Security-based options and futures contracts
 - CFTC—Non security-based options and futures contracts, such as commodities, interest rates, currency, etc.
- Dodd-Frank repeals provisions in Gramm-Leach-Bliley Act (GLB) that prohibit the SEC from regulating security based swaps and provisions in the Commodity Futures Modernization Act of 2000 (CFMA) that prevented the CFTC from also regulating OTC derivatives.
- SEC and CFTC will share primary authority for regulation and supervision of the OTC derivatives market (both swaps & participants) and jointly participate in the rule-making process.
- Where a banking entity is required to be registered under Dodd-Frank for derivatives activity, certain regulatory requirements would be set by the bank's primary federal regulator (a.k.a. its prudential regulator).



Regulation of Derivatives

- The definition of a swap is broad and expansive with exclusions.
- A swap, subject to the exclusions on the following slide,
 - “means any agreement, contract, or transaction...
 - that provides for any purchase, sale, payment or delivery (other than a dividend on an equity security)...
 - that is dependent on the occurrence, nonoccurrence, or the extent of the occurrence of an event or contingency associated with a potential financial, economic, or commercial consequence,
 - that provides on an executory basis for the exchange, on a fixed or contingent basis, for 1 or more payments based on the value of 1 or more...financial, or economic interests or property of any kind.”
- Examples include interest rate swap; rate floor, cap or collar; basis swap; equity index swap; total return swap; equity swap; debt swap; credit default swap; weather swap; commodity swap; etc.



Regulation of Derivatives

- The term 'swap' DOES NOT include
 - i. security futures or other transaction type already regulated by the CFTC
 - ii. any sale of a non-financial commodity intended to be physically settled (that is, a commodity forward contract)
 - iii. an option on a security subject to the Securities or Commodities Exchange Act
 - iv. exchange traded foreign currency options subject to the Securities Exchange Act
 - v. an agreement to sell one or more securities on a fixed basis that is subject to the Securities or Commodity Exchange Act
 - vi. an agreement to sell one or more securities on a contingent basis that is subject to the Securities or Commodity Exchange Act but IS NOT a CDS
 - vii. a note or other evidence of indebtedness that is a security as defined by the Securities Act (Some securities may not fall within this exclusion, if they have other features of a swap.)
 - viii. any agreement entered directly or with an underwriter used by the issuer of a security for the purposes of managing a risk associated with capital raising
 - ix. an agreement with the US government, a Federal Reserve Bank, or a federal agency that is backed by the full faith and credit of the United States
 - x. or a security based swap other than a mixed swap



Regulation of Derivatives

- The definition of swaps, theoretically, could encompass a wide variety of financial contracts including most forms of insurance
- While such an expansive reading of the term ‘swap’ might be unlikely, questions over the scope of the CFTC & SEC’s jurisdiction of contingent contracts will be of foremost interest to the insurance industry and worth watching as rules are developed
- Dodd-Frank specifically states, “A swap—(1) shall not be considered to be insurance; and (2) may not be regulated as an insurance contract under the law of any State.”
- So, swaps aren’t insurance, but insurance could be swaps.
 - Some possible examples include guaranteed investment contracts (GICS), financial guarantee insurance bonds and surety bonds



Regulation of Derivatives

- The SEC will regulate security-based swaps which reference a single security or loan or a narrow-index or group of securities
 - Examples include credit default swaps and swaps on narrow indices (generally, less than 10 securities)
- The CFTC will regulate non-security-based swaps
 - Examples include interest rate swaps; rate floors; swaps on broad indices (generally, 10 or more securities)
- Mixed swaps have features of both and are regulated by both the CFTC and the SEC
 - For example, a total return swap has payments tied to LIBOR (therefore, an CFTC swap) and payments tied to the price movements of a security (therefore, an SEC security-based swap)
- The Financial Stability Oversight Council is the ‘arbitrator’ if the CFTC and the SEC cannot agree on items such as joint rules and jurisdiction



Regulation of Derivatives

- Prudential regulators retain substantial authority with respect to banking institutions
- Where there is overlap in regulation between the CFTC, SEC and the prudential regulator, cooperation will be necessary for a smooth rule-making process
- Contrary to usual procedures, where sections of Title VII of the Act are not workable, the CFTC & SEC may not grant exemptions—a legislative remedy is necessary
- Certain swaps must be traded on exchanges, cleared and publicly reported
- New swap market mechanisms are required to be established—exchanges, clearing organizations and swap information repositories
- Swaps entered into before the clearing requirement is applicable will not need to be cleared if they are reported within Dodd-Frank's specified time frames
- Swaps that are required to be cleared must be traded on or through an exchange or swap execution facility—unless none make the swap available for trading
- Swaps not cleared must be reported to a swap repository or to the SEC or CFTC
- Swap dealers and major swap participants must register with the SEC or CFTC (or both) and be subject to reporting and prudential standards, including business conduct standards



Regulation of Derivatives

- Prudential regulators, in consultation with the CFTC & SEC, will set capital & margin requirements for swap dealers & major swap participants
- Nonbank financial entities, such as insurance companies, must meet requirements at least as strict as those imposed on insured depository institutions.
- Requirements are higher for swaps that are not cleared
- An exemption is provided for commercial “end users” who use derivatives to hedge against commercial risk
- The SEC & CFTC, jointly, may consider whether to exclude depository institutions and credit unions with total assets of \$10B or less
- Fiduciary responsibilities are imposed on swap dealers who advise or enter into swaps with governments or municipalities
- The Lincoln Amendment (Section 716) prohibits federal assistance to swap dealers
 - Examples of assistance: FDIC insurance, Federal Reserve discount window
- Dodd-Frank has provisions designed to hinder traders seeking to go around the law by conducting these transactions outside the US
- Effective dates, unless specifically stated, are 360 days from enactment of Dodd-Frank. Rules are effective within 60 days after rules are final.



Regulation of Derivatives

- Impact on Actuaries and Insurance Companies
 - Some insurance products might be considered to be swaps
 - Implications for product design, filing and approval
 - May limit market availability of derivative contracts
 - Prices of swaps may be higher than today driving higher insurance costs
 - Companies will want to determine whether they fall within the definition of swap dealer, major swap participant, securities-swap dealer, major securities-swap participant, commodity trading advisor or commodity pool operator
 - Given the broad definition of the term 'swap', questions could arise as to the jurisdiction between the CFTC, SEC and state regulators
 - The result could be higher reporting requirements, higher capital requirements and greater scrutiny from existing and new regulators
- Actions to take by actuarial and legal staff include:
 - Review company insurance products and business practices
 - Monitor and comment on rulemaking process underway jointly by the SEC and CFTC



Property and Casualty Industry Reaction and Impacts

Orin Linden, FCAS, MAAA

Member, Financial Regulatory Reform Task Force



Reaction of the Property & Casualty Insurance Industry

There is general relief that the Act does not target P/C insurers as posing significant systemic risk

- Leigh Ann Pusey, president of the American Insurance Association, released the following statement on 9/16/2010:

"The American Insurance Association supports efforts to reform and modernize financial services regulation. The bill passed today largely recognizes that property and casualty insurers do not pose systemic risk."

- P&C insurers with greater than \$50 billion in assets who do not meet the definition of banks appear not to be subject to being declared systemic risks
 - The \$50 billion automatic supervision only applies to "Large Bank Holding Companies"
 - There is a 11 factor test for "US and Foreign Non Bank Financial Companies" to be subject to regulation and oversight by the Federal Reserve Board (A "Designated Company")
 - They have to be "predominantly engaged in financial services" as defined in the Bank Holding Company Act of 1956



Reaction of the Property & Casualty Insurance Industry

The Act will not generally supersede or duplicate state regulation and does not impose onerous new federal or dual state/federal regulation on the P&C insurance industry.

However, there is apprehension that it could ultimately change or form another layer of regulation.

- Unclear at this time how far federal involvement will go
- Could significantly affect industry as regulations are written
- Although FIO's sole function is to provide information on the insurance industry, it's jurisdiction includes all P&C lines except crop insurance
- Unknown what FIO report, due in 18 months, will say about regulation



Reaction of the Property & Casualty Insurance Industry

- The Property Casualty Insurers Association of America commented on their web site:
 - “PCI is pleased that significant improvements were made to the final bill to minimize the potential negative consequences of adding federal oversight to the state-based insurance regulatory system. However, PCI remains concerned over the long-term impact of this legislation on U.S. competitiveness for the financial services sector.”
- The definition of swaps is extremely broad and doesn’t explicitly exclude insurance contracts
 - As discussed, while swaps are not regulated as insurance, it is conceivable that some insurance contracts could be considered as swaps



Streamlines Reinsurance Placements

- Ceding insurer's state of domicile regulates:
 - Credit for reinsurance, if NAIC accredited or similar
 - Other states can't impose rules for "admitted" reinsurer credit and must accept credit granted by cedant's state of domicile
 - Non-US domiciled reinsurers may receive similar benefit
 - Dispute resolution
 - Choice of law
 - Imposing standard terms differing from contract
- Reinsurer's state of domicile still regulates:
 - Reinsurer solvency, if NAIC accredited
 - Other states can't require additional financial info



Non-US Reinsurers

- If no branch or company licensed in cedant's state of domicile:
 - Still have to post collateral unless a master trust is approved by cedant's state of domicile
 - Many states relax capital requirements for highly rated reinsurers domiciled in countries with appropriate regulatory environments (e.g., Germany)
- As with domestic reinsurers, if reinsurance credit is granted by cedant's state of domicile, all other states where cedant is licensed must accept the reinsurance



Streamlines Non-Admitted Placements

- Admitted carriers are primary insurance companies that are either licensed or domiciled in any given state
- Non-admitted, or Excess & Surplus Lines, carriers sell commercial insurance in states in which they are not licensed
 - Permitted by US law, with a variety of regulations
 - White and black lists
 - Premium tax issues
 - Who they may write and under what conditions



Streamlines Non-Admitted Placements

- Act designates one state, the home state of the insured, to regulate non-admitted placements
 - Home state defined as insured's "principal place of business," which is not defined
- Home state collects premium tax for non-admitted placements
 - States may adopt legislation or enter an agreement to allocate premium tax paid to the home state
 - The NAIC may submit a report describing any allocation agreement reached among the states
 - If no allocation agreement is reached, states, other than the home state, will not receive their portion of premium taxes
- States should participate in the NAIC's national insurance producer database for the licensure of surplus line brokers
 - After two years, non-participating states cannot collect surplus lines broker license fees



Streamlines Non-Admitted Placements

- Capital and surplus requirements for US domiciled insurers are required to conform to NAIC Non-Admitted Insurance Model Act, establishing uniform standards.
- States cannot prohibit surplus lines brokers from doing business with non-admitted insurers on the NAIC IID's Quarterly List of Alien Insurers, eliminating separate state listings for non-US insurers.
- State diligent search requirements for exempt commercial purchasers are pre-empted, provided broker advises that insurance may be available on admitted paper and purchaser requests non-admitted placement in writing.



Other Issues of Interest to Actuaries

Marianne Purushotham, FSA, MAAA

Member, Financial Regulatory Reform Task Force



Title IX: Investor Protection

- Subtitle A establishes Investment Advisory Committee within SEC
 - Group of investors to advise SEC on regulatory practice and priority
- Required Studies
 - Study of Standards of Care for brokers, dealers, investment advisors (within 6 months of enactment)
 - Study of Retail Investor Financial Literacy recommending appropriate investment disclosure (within 2 years of enactment)
 - Study of Financial Planners
 - Need for oversight
 - Uses and potential abuses of designations
 - Within 6 months of enactment



Title IX: Investor Protection

Potential Impact on the Insurance Industry

- Investor disclosures
- Investment advisors and financial planners – enhanced examination and enforcement resources required
- Distribution of registered products
 - Suitability standard to fiduciary standard for retail customers
 - Disclosure of conflicts of interest, compensation
 - Can prohibit sales practices and compensation approaches



Title IX: Investor Protection

- Regulation of Credit Rating Agencies
 - Recent ratings on structured financial products, establish documentation and standards
- Office of Credit Ratings within the SEC
 - Compliance staff, authority to levy fines
 - Examines Nationally Recognized Statistical Ratings Organizations (NRSROs) at least annually
 - NRSRO required disclosures – ratings record, methodology
 - NRSRO liability to investors – private rights of action
 - Ratings analyst requirements – qualifying examination, continuing education



Title IX: Investor Protection

- Establishes Office of the Investor Advocate within the SEC with the following functions:
 - Assist retail investors in resolving significant problems dealing with SEC
 - Identify areas in which investors would benefit from changes in the regulations of the SEC
 - Identify problems that investors have with financial service providers and investment products
 - Analyze the potential impact on investors of the SEC regulation
 - Propose to the SEC changes in the regulations changes that may be appropriate to mitigate problems



Title IX: Asset Securitization Programs

New Requirements

- Asset-backed securities
 - Defined as fixed-income instruments collateralized by any type of self-liquidating financial asset (including a loan, a lease, a mortgage, or a secured or unsecured receivable) that allows the holder of the security to receive payments that depend primarily on cash flow[s] from the asset
- Issuer has to have at least 5 percent share in credit risk – exemptions and further clarification pending
- Sets rules for disclosures regarding quality of underlying assets



Executive Compensation

- Shareholders given non-binding vote on executive pay at least every 3 years
- SEC given authority to give shareholders proxy access to nominate directors
- Public companies given authority to take back executive compensation based on inaccurate financial statements



Title X: Consumer Protection

- Establishes the Consumer Financial Protection Bureau to consolidate existing federal consumer protection offices
 - Housed in Federal Reserve
 - Federal protection requirements for all financial institutions
 - Director appointed by President
 - Independent rule-writing authority
- Exemption provided for companies under authority of a state insurance regulator
 - Section 1027, Subtitle B, paragraph (f)



Q+A



Appendix (Definitions)

- Prudential Regulators are:
 - Board of Governors
 - State-chartered banks that are members of Federal Reserve System
 - Savings & loan holding companies and subsidiaries
 - Other organizations or holding companies under the Federal Reserve Act
 - Office of the Comptroller of the Currency
 - National bank
 - Federally chartered bank
 - Federal savings association
 - FDIC
 - State-chartered banks that are not members of the Federal Reserve System
 - State-savings association
 - Farm Credit Association
 - Institutions chartered under Farm Credit Act of 1971
 - Federal Housing Finance Agency
 - Entities regulated under Federal Housing Enterprises Financial Safety and Security Act of 1971



Appendix (Definitions)

- SWAP DEALER, in general, means any person who:
 - Holds itself out as a dealer in swaps;
 - Makes a market in swaps
 - Regularly enters into swaps with counterparties as an ordinary course of business for its own account; OR
 - Engages in any activity causing the person to be commonly known in the trade as a dealer or market maker in swaps
 - Excluded are insured depository institutions originating loans with a customer
- A swap dealer may be a swap dealer for some classes of swaps but not other classes
- The term ‘swap dealer’ does not include persons entering into swaps for their own account, either individually or as a fiduciary, but not as a part of a regular business
- The CFTC may write regulations to grant a ‘de minimus’ exemption



Appendix (Definitions)

- **MAJOR SWAP PARTICIPANT**, in general, means any person who is not a swap dealer and either:
 - Maintains a substantial position in any of the major swap categories as determined by the CFTC
 - Exclusions—positions held for hedging or mitigating commercial risk and positions held for employee pension plans; OR
 - Whose outstanding swaps create counterparty exposure that could have serious adverse effects on the financial stability of the US, its banking system and/or its financial markets; OR
 - Is a highly leveraged financial entity not subject to Federal banking agency capital requirements, and maintains a substantial position in any swap category as determined by the CFTC



Appendix

(Task Force past deliverables)

- In comments on H.R. 2609, the *Insurance Information Act*, and H.R. 4173, the *Wall Street Reform and Consumer Protection Act of 2009*, the Task Force recommended including an explicit provision in the legislation to include important professional expertise by creating an Office of the Actuary. (December 2009)
- A webinar was held in April 2010 that outlined federal regulatory responses to the financial crisis and their potential effects on the life and casualty insurance industry. Panelists discussed current proposals for modernizing financial services regulation and examined reactions to the proposals from Congress, the NAIC, and the Academy.
- A white paper, *Role of the Systemic Risk Regulator*, which outlined new key functions necessary for effective systemic risk regulation was released in May 2010.
- The Task Force urged in a letter to Congress to include an Office of the Chief Actuary in the Office of Financial Research as Congress was in conference reconciling bills H.R.4173 and S.3217 which became the Dodd-Frank Act (June 2010).
- Coming soon: an updated version of the 2003 monograph “The Role of the Actuary under Federal Insurance Regulation”

