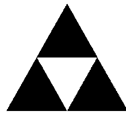

AMERICAN ACADEMY *of* ACTUARIES

Benefit Illustrations
Actuarial Standards Board
1100 Seventh Street, NW, 7th Floor
Washington, DC 20036-4601

December 8, 2000

Re: Proposed ASOP, "Projected Benefit Illustrations in Connection
With Retirement Plan Amendments"

Dear Ladies and Gentlemen:

I am writing on behalf of the Pension Committee of the American Academy of Actuaries to offer comments on the proposed Actuarial Standard of Practice, "Projected Benefit Illustrations in Connection With Retirement Plan Amendments."

We appreciate the opportunity to comment on this proposed Actuarial Standard of Practice (ASOP). It appears that a great amount of time and thought went into it. It has generated a lot of discussion among our committee members, including some consensus, as well as some debate.

In general, we have significant concerns about the proposed ASOP. It does not focus purely on actuarial concepts, which makes us wonder exactly what its purpose is. We suggest stepping back and looking at a bigger picture. We recommend starting with an ASOP that addresses projecting benefits, before narrowing it down to projections in situations where there have been plan amendments.

Indeed, many of our committee members suggest narrowing the focus even further to deal only with plan amendments that require plan participants to choose between retirement plans, should the Actuarial Standards Board (ASB) choose to proceed with this proposed ASOP.

In the absence of abandoning this proposed ASOP, we have summarized our specific comments below (organized by section). You will see that there are many different opinions among our committee members regarding the Exposure Draft (ED).

Section 1.2: Scope

There were many different viewpoints regarding this section, as noted here.

A few committee members believe that the scope should be expanded to apply to all projected benefit illustrations prepared in connection with retirement plan amendments, regardless of whether an Actuarial Opinion of Compliance (AOC) is issued. This would make it similar to other standards.

In addition, one member suggests that it be expanded slightly (or supplemented) by deleting the words "for which an Actuarial Opinion of Compliance has been requested" in paragraph 1.1. of the ED. This would set the stage for presenting the "mandatory minimum requirements" that would be applicable to "*all* benefit projections made in connection with plan amendments" (whether or not "prepared for participants"). The AOC could then include a definition that sets forth its applicability in those situations involving benefit projections "prepared for participants" that the actuary "is involved in preparing, reviewing or giving advice on preparing." Alternatively, the concept could be introduced in a separate section of the ASOP, which would detail the more stringent standards that would apply in such situations.

A number of committee members realize that there is interest among some ASB members to pre-empt potential legislation or regulation with an appropriate actuarial standard. However, a standard that is very narrowly drawn may only invite criticism from legislators and regulators as an attempt by the actuarial profession to evade its responsibility in light of previous bad press. On the other hand, an extensive standard may invite a similarly extensive and potentially misleading legislative disclosure requirement which would be difficult for the actuarial profession to oppose if it had already been "hard-coded" into an Actuarial Standard of Practice.

Another committee member is concerned about the volume of information already required and is relieved to find this ED applies only where it does.

Yet another committee member agrees that the scope should be broader, but disagreed with the general concept of the AOC. This member feels that the ASOP should provide a model for actuaries to follow and to bring to the attention of plan sponsors. This committee member believes that this is all that can be done until there is legislation (or regulation) requiring certain disclosures. The content of any disclosure is still the responsibility of the plan sponsors. Plan participants who receive statements with no AOC would not be aware of any omission - unless an AOC is mandated by law or regulation.

Given the extensiveness of the proposed standard, one committee member is opposed to expanding it to all benefit illustrations for plan amendments. This member would prefer an Actuarial Compliance Guideline when and if any legislation is passed requiring such illustrations. In the meantime, they would seek to work with legislative parties towards a reasonable disclosure requirement under Section 204(h) of ERISA. Therefore, the committee member suggests that Section 1.1 should be confined to such illustrations as may be required under Section 204(h).

Many committee members feel that the AOC is too restrictive and would seldom be used. There is a concern that many clients would not hire an actuary to obtain an AOC for several reasons:

- The ED mandates too many requirements for an AOC, and many committee members are unsure of its value.

- The disclosures required by the ED are so lengthy and difficult to understand that many plan sponsors may choose to forgo an AOC to improve participant understanding.

- Some plan sponsors will not request an AOC because they want a more comprehensive communication piece including other compensation and benefit issues.

- An AOC can be expensive to produce, especially if it is personalized or if a software tool or website must be developed.

Therefore, some committee members recommend a two-tier approach. The first tier would be a mandatory minimum requirement for all projected benefit illustrations prepared in connection with retirement plan changes. The second tier would serve as an elective standard to be followed when an AOC is issued. Some suggest this mandatory minimum standard because the voluntary nature of the AOC raises some concerns; no other ASOP provides clear guidance to help actuaries determine when they must refuse to issue a statement. With this two-tier approach, actuaries producing benefit projections would have clear guidance whether or not an AOC was issued.

Some committee members would extend the mandatory minimum to require actuaries to supply plan sponsors with sufficient information to enable them to prepare projected benefit illustrations that comply with this standard.

Other committee members did not like the idea of a mandatory minimum requirement. They feel it is the plan sponsor's choice of what to provide in a benefit illustration and that actuaries cannot impose a minimum requirement on them through an ASOP. Requiring the standard to apply to such situations would effectively bar actuaries from working on the great majority of projects of this nature for which clients consider retaining an actuary. This would result in relegating these assignments to non-actuaries, even though actuaries are the most qualified to provide this information. The ED provides a model that actuaries can to bring to their clients, but one that actuaries cannot force their clients to follow without statutory or regulatory support. One committee member agreed that some kind of standard is necessary, but did not endorse any of the alternatives noted above, while another member felt that given the plethora of different scenarios of plan amendments, replacements, terminations, etc., mandatory minimums would have to recognize too many different situations to be feasible.

Some committee members disagreed with a two-tier approach because they felt there should not be an AOC at all. Others feel the two-tier approach is an improvement over the ASOP as originally proposed.

However, some committee members feel that at a minimum, the actuary should inform the client of the substance of this standard, if it is adopted.

Section 2.2: Participant

In some situations, illustrations could be provided to participants after an amendment has taken effect, or in anticipation of a pending amendment or proposed legislation. Many agreed with the suggestion that this sentence should be reworked to say, "who may be/will be/has been affected by a retirement plan amendment…" One member added that if the standard is limited to 204(h) illustrations, the wording should follow the requirements of 204(h).

Other committee members feel it should be applied only to actual plan amendments.

Section 2.7: Retirement Plan

The ED covers both defined benefit (DB) and defined contribution (DC) retirement plans. Some

committee members believe that the scope should be narrowed to cover only DB plans. The current controversy that gave rise to the ED was caused by changes to DB pension plans. In addition, participant notification under ERISA is generally required only for reductions to benefit accruals for pension plans. Most DC plans are set up as profit sharing or other types of plans that are not subject to the notification requirement. Furthermore, the process of changing contribution rates in a DC plan is inherently easier for participants to understand and does not appear to require an actuarial standard of practice.

More significantly, the ED does not call for disclosures that communicate the fundamental differences between the traditional DB plans and DC plans in situations involving a change from one type of retirement plan to the other. Traditional DB plans provide a guaranteed benefit, while DC plans do not. A few committee members felt that presenting projected benefits for the two types of plans together blurs the differences between the plan types. In an apples-to-apples comparison, the comparable guaranteed benefit from a DC plan would be zero. Even if a range of future investment returns were presented for the DC plan, the choice of the range would be arbitrary under the ED. For example, a recent survey shows that 45% of the assets of profit-sharing/401(k) plans are invested in company stock. The variation of returns of a single security is much greater than the variation for a diversified portfolio. But an actuary could elect to use the same range for both types of investments under the ED.

Investment advisors have already started to discuss the risks of outliving an individual account balance from a DC plan. For instance, in *Business Week*, July 31, 2000, an article describes a way of quantifying the risks during the payout stage of an individual account:

> Rather than basing [retirement income] plans on average returns, the new approach uses estimates based on probabilities. Planners measure the odds by plugging historical returns and volatility of stocks, bonds, and cash into their computers and running hundreds of scenarios.

Expanding the scope of the ED to provide a state-of-the-art description of the inherent participant risks in a DC plan would add more complexity, and some committee members believe this would go beyond the motivation for the ED. Therefore, some committee members believe the scope should be narrowed to cover only DB plans. Other guidance can be issued addressing projected benefit illustrations for plan changes involving DC or individual account plans.

However, many committee members feel that, it is important to tell the whole story, even though there are different types of plans.

For example, consider a plan sponsor that converts its traditional DB plan to a cash balance plan while adding a 401(k) match, and wants participants to consider this two-part retirement program as a total package. Some reasonable rate of return on 401(k) assets (other than zero or negative) could give a reasonable comparison (with appropriate caveats).

The "benefit numbers" projected for a conventional profit-sharing plan - to take the extreme - and for a traditional DB Plan that it is replacing tell a very small part of the story.

Some committee members suggest that a set of boilerplate caveats regarding any distinctions in the nature of the guarantees belongs in any valid "before and after" comparison. They feel that this information should not be buried in the "definitions" section of the ASOP, but should rather be made a

mandatory item to be included in any disclosures going to Plan participants.

One suggestion is to include a disclosure statement that does not require a great amount of detail; e.g. a statement that DC accumulations are dependent on the underlying investment results and the participant's remaining working lifetime.

One committee member felt that communication regarding profit-sharing/401(k) plans is inherently a plan sponsor function to which the actuary often has little or no input. If a standard (or Compliance Guideline) is applicable to DB plans only, any communication that takes place with regard to other plans (or the entire participant benefit package) should not be a concern of the standard/guideline.

Other committee members disagree with both this viewpoint and the thought that the scope of the ASOP should be narrowed. Some members feel that the AOC should be limited to DB plans but that it should allow communications to address more than the limited focus of the AOC. Perhaps in these situations, a range of rates of return can be illustrated as Sample Illustration B, demonstrating the effects of various salary scales.

The switch from a DB plan to a DC plan often has a greater impact on the participant's retirement planning, particularly when the participant has to pay a significant portion of the cost of the new plan. Some of these issues also exist in cash balance plans (particularly those that allow participants to direct investments or move accruals from the DB plan to a DC plan). Any change in the sharing of costs should be disclosed even if the overall benefit level is the same.

One member agreed that DC plan changes are easier for participants to evaluate and therefore do not require the same comprehensive illustrations, but is reluctant to add one more requirement that disadvantages DB plans. In the end, this member could not see requiring meaningless, burdensome disclosures just to equalize the playing field.

It is one committee member's impression that the current controversy about disclosure and/or benefit projections has been stimulated largely by conversions from "traditional" DB plans to (hybrid) cash balance plans. Perhaps an equal or a more valid complaint occurs whenever a "traditional" DB plan is replaced by a "conventional" DC plan. Accordingly, this member would not agree that the ED defines "Retirement Plan" too broadly. It may, however, be appropriate for the ASOP to specify that changes from DC plan to DC plan are not normally actuarial matters subject to the ASOP.

One member noted that disability benefits (see ED Section 2.8(d)) are not considered accrued benefits for those not yet disabled and the removal or amendment of such plan provisions should not be treated as if they were somehow nonforfeitable.

Section 3.1: Overview of Analysis of Issues and Recommended Practices

Many committee members strongly agree that illustrations for hypothetical participants should be allowed, since mandatory personalized statements are not always needed for clear understanding and may be an unnecessary expense.

One committee member stresses limiting the nature, type and number of illustrations under a Compliance Guideline approach, to those required by law. Should the ASB elect to speak to issues

beyond the requirements of current law or regulation, this member feels it should limit itself to providing a "laundry list" of items to be considered on a voluntary basis by the actuary and not jeopardize the prospect that the benefit communication will benefit from an actuary's input by imposing more stringent rules.

Section 3.3: Comprehensive Disclosure of Significant Changes

Some committee members suggest that the mandatory minimum (the first tier described above) should require all of Sections 3.3 and 3.4, except Subsections 3.3.3 and 3.4.3. Significant changes could be comprehensively disclosed using Alternative A or B under Section 3.3, or *Projected Benefit Illustrations Provided When Participants Are to Choose Among Two or More Retirement Plan Alternatives* under Section 3.5.

Using the AOC would require meeting the standards of Subsections 3.3.3 and 3.4.3 in addition to all requirements of the first tier. These members recommend that Alternative A (Section 3.3) and *Projected Benefit Illustrations Provided When Participants Are to Choose Among Two or More Retirement Plan Alternatives* (Section 3.5) should be required when an AOC is issued. However, some committee members do not feel that the projection of prior plan benefits should be required for an AOC, but that the ASOP should encourage actuaries and plan sponsors to provide such information voluntarily. Getting into what-if scenarios for formulas that no longer exist begs the question of potential offsetting changes in other plans (e.g. what if a disability benefit within the pension plan is replaced by a long-term disability benefit under the insurance package?).

Eliminating some of the detailed requirements would allow more discretion while still ensuring that there is a compulsory standard calling for complete disclosure in plan amendment situations where actuaries are involved.

Section 3.3.1: Illustrations of Benefits Payable Under the Amended Plan at Specific Points Due to the Occurrence of Specific Events

Many committee members suggest that this section clarify the fact that benefits under different decrements do not all need to be shown, as this can produce voluminous results. Instead, verbal disclosure of ancillary benefits, such as in the Appendix 2 illustrations, would be acceptable.

Section 3.3.2a: Illustrations of Benefit Accrual Patterns for Subsidized Early Retirement

Many committee members feel that projected benefit illustrations should show any significant changes – not just increases – in early retirement benefits.

Section 3.3.3: Disclosure of Wear Away

The issue of wear away is very controversial. Some committee members believe the ASOP should require inclusion of information about wear away caused by subsidized early retirement benefits or other relevant factors in any disclosures prepared for participants.

First, consider a traditional retirement plan converting to a cash balance retirement plan. The traditional

plan defines normal retirement as age 65 and provides unreduced (or subsidized) early retirement benefits at earlier ages. Assume that the plan conversion is done so that participants continue to accrue benefits if they commence payments at age 65, but there is a period during which no additional benefits accrue if the participant commences benefits before reaching normal retirement age. In this situation, the illustration could disclose that there is no wear away, even though there would be de facto wear away for participants whose retirement benefits commence at an early retirement age. Many committee members feel that the more limited disclosure could confuse or mislead participants. Accordingly, we recommend requiring disclosure of the ages (e.g., 55 to 64 or 65) at which wear away may or may not occur.

Second, in situations where wear away could be caused by fluctuations of variables, or a potential future change in the plan's lump sum basis, the ED allows disclosures that would not identify this possible wear away. Some committee members believe that this possibility should be mentioned in the disclosures. One member expressed concern about the actuary's potential liability if a particular combination of circumstances that could trigger a wear-away, is not anticipated. Another member suggests not disclosing wear away due to such fluctuations.

One committee member prefers some sort of description rather than another series of numbers for this disclosure.

One committee member feels that early retirement disclosure requirements should really be addressed legislatively through Section 204(h).

Section 3.4: Fair Disclosure of Significant Changes and Section 4.1.2: Principal Assumptions and Procedures

Many committee members think that the guidance for assumption selection and disclosure should be modified to coordinate with the ASOPs issued for other retirement plan matters.

First, references to ASOP No. 27 (Selection of Economic Assumptions for Measuring Pension Obligations) and ASOP No. 35 (Selection of Demographic and Other Noneconomic Assumptions for Measuring Pension Obligations) should be made. ASOP No. 27 addresses the consistency of assumptions and includes an appendix with selected references for economic data and analysis.

Second, the assumption disclosure in the ED requires the actuary to "describe all principal assumptions and procedures used in sufficient detail to permit the participant to understand the basis for the results." The participant may not understand actuarial assumptions. Hence, the ASOP could allow the disclosure to avoid describing some more technical assumptions but offering more detailed information on request. Giving enough information for a qualified actuary to reproduce the calculations but incorporating a layman's description where possible is the right combination, although this type of disclosure could result in voluminous information.

Some committee members prefer the " description of each actuarial assumption" Approach used in ASOP No.34 on Qualified Domestic Relations Orders. Others favor requiring the more technical disclosure requirement of ASOP No. 35 (i.e. that "sufficient detail should be shown to permit another qualified actuary to assess . . ." A few committee members felt that there is a potential conflict between these approaches.

There are other issues regarding consistency of assumptions with a positive inflation projection. Some committee members suggest that the ED require following the assumptions used for some external basis, such as to cost the plan, for consistency. If these are not appropriate, an alternative measurement should be noted and the deviation explained. As in other ASOPs, a departure from the standard would be allowed if disclosed and justified. A costing assumption (such as interest) should not be used in place of what the plan offers, if that is different.

Also, to better guide participants in running alternative scenarios in computer programs and interactive applications, some committee members recommend allowing participants to make selections labeled as baseline assumptions. Alternatively, a baseline scenario could be illustrated first, and participants could then select assumptions. Computer programs can be powerful tools, and some participants tend to rush into using them before reading all the instructions. Providing good baseline assumptions as starting or default values would help participants use computer programs more effectively. One committee member believed it would be useful to have "warnings" when a participant uses assumptions in a computerized model that go beyond hard-coded ranges. However, that committee member also believes the actuary should not be required to express an opinion covering all the possible situations that participants might find in particular plans.

Section 3.4.2: Reasonable Baseline Assumptions and Section 3.4.4: Effects of Inflation

Some committee members are concerned that these two sections might prohibit projected benefit illustrations from using zero wage inflation assumptions. Under this approach, an inflation element is usually removed from all of the economic assumptions. For example, Social Security benefit statements show projected benefits using a no wage growth assumption. Since Social Security indexes individual historical earnings to determine the AIME and benefits, the dollar amount given approximates the wage replacement benefit in today's dollars and real terms. This flexibility should be allowed where appropriate so long as it does not produce misleading results. This approach could be misleading if it were used to compare a career average pay (i.e., accumulation type) formula to a final average pay formula, or to present projected benefits for a participant in a plan that uses a long period, such as a final 10-year average pay definition.

Another issue involves comparing flat-dollar benefits with benefits based on pay. The ED does not discuss this issue, and some committee members believe it should. Simply projecting pay and pay-based benefits, while freezing dollar-based benefits, could be misleading in situations with a history of flat-dollar benefit increases and an expectation of future increases. However, this approach is called for under ERISA funding rules, and some actuaries prepare comparative benefit illustrations using this approach. This type of projection results in declining wage replacement ratios for flat-dollar benefits, and this consequence is often not communicated to or understood by users.

To provide better illustrations, some committee members feel that an actuary could remove the wage increase assumption from all economic assumptions and use flat-dollar benefit rates. Alternatively, several committee member felt that one could project increases in the flat-dollar amount – perhaps following the collective bargaining cycle – at the rate of wage inflation. Either of these approaches would stabilize the wage replacement ratios (and replacing wage income is, of course, the purpose of a retirement plan). Similar issues arise when dealing with the Internal Revenue Code limits on maximum benefits and compensation. Several other committee members disagreed.

One committee member agrees, if such comparisons are limited to situations where the participant actually has a choice between future benefit formulae.

One committee member favors a written caveat rather than numerical illustrations. Numerical illustrations can cause misunderstandings and can be construed as promises of future benefit increases if not properly caveated. This is like the "implied promise" whenever compensation increases are projected. This would be subjective and could be difficult politically, particularly in a collective bargaining situation where many of these plans are found.

Section 3.4.6: Available Payment Forms or Forms of Equivalent Value

Some committee members consider Section 3.4.6 to be overly restrictive. If the plan sponsor has switched to an annuity plan but participants are more oriented to lump sums, these members believe the actuary should be permitted to show benefits in the form of lump sum values and provide a caveat that only annuities are available. If one plan has a lump sum (subsidized or not), and the other plan provides no lump sum, any lump sum comparison should clearly indicate how the lump sum is determined in the second case. One committee member has seen enough lack of understanding - even among well educated participants - over the relative value of annuities and lump sums to believe that any comparison must be apples-to-apples.

However, many committee members agree with the ED that the projected benefit illustration should always show a form of payment that is actually available to the participant from the amended plan and that the paragraph above should apply to a supplemental alternative comparison *only*, which may be provided *in addition to* the base comparison.

Section 3.4.8: Use of Computer Programs and Other Interactive Applications to Project Benefits

We have four separate comments relating to this section:

- Many committee members feel that computer programs and other interactive applications used to project benefits should offer default values or limit participants to a range of each assumption that the actuary deems reasonable.

- While software programs and websites, are useful tools, they can be very expensive and therefore seldom used. (One committee member felt this comment is irrelevant.)

- Some committee members are concerned about protecting software programs against tampering. Perhaps programs could be designed and run on request by actuaries. Several members feel this is not an issue. One member feels that with the widespread use of computer kiosks, the profession is fully capable of protecting communication vehicles from tampering.

- It is unclear to some committee members how the AOC applies to joint work products for projecting benefit illustrations, where plan sponsors, programmers, and actuaries are working together. This should be clarified.

Section 4.2.1 (e): Content of the Actuarial Opinion of Compliance

The AOC implicitly states that the actuary providing the AOC believes the statement is "fair and comprehensive." Some committee members feel misunderstandings would be minimized if, in addition to supplying the AOC, the actuary (or plan sponsor) provided a broad caveat warning participants of the difficulty of relying on projections with assumptions. It is particularly important to avoid miscommunications, since the AOCs will carry an "actuarial stamp of approval" and will reflect directly on members of the profession. One committee member disagreed with this comment. While not totally convinced that the AOC is desirable, this member believes standards are necessary.

Appendix 2: Illustrations

We have the following comments regarding the examples provided:

- Several committee members feel the examples are extremely valuable (provided they are labeled clearly). They really aid in understanding the requirements set forth in this ED.

- It is very important that any charts or graphs be clearly labeled. Several committee members had a hard time telling the difference between the graph on page 24 and the one on page 31. They eventually figured out that page 24 is displaying a graph of a deferred to age 65 benefit as a percent of pay at termination and that the graph on page 31 is showing an immediate benefit as a percent of pay at termination.

- A few committee members recommend trying these examples with some focus groups.

Several committee members also agreed with the following statements:

- Sample Illustration A is very comprehensive but is also very long. It also does not reflect any other changes in benefits that the plan sponsor made, such as adding a 401(k) match. Some committee members feel that should be an option but not a requirement. Under "Lump Sums," the phrase "didn't" should be "did not".

- Some projections included in this illustration are too complicated and could be unintentionally misleading. For an example, the graph on page 24 shows the replacement ratio declining with age under two salary-scale improvement rates. Could this illustration lead a participant to the erroneous conclusion that he/she should quit at 53 to get the largest dollar benefit if his or her salary is likely to grow? While we understand the value of this chart in showing slow trackers vs. fast trackers from an plan sponsor's perspective, it does not seem particularly valuable or understandable to an participant. This chart shows a deferred annuity payable at age 65, divided by termination compensation as opposed to the table on page 31, which shows an immediate annuity divided by pay at termination, resulting in a completely different curve shape.

- Some committee members feel that this type of analysis is useful. Other members feel it would be more effective if a statement was included explaining that the new plan was based on career average pay and not weighted by final average pay, and that inflation protection would therefore be reduced during the participant's working career. A few committee members were generally concerned about

the volume of information required, from both an plan sponsor-cost and participant-comprehension standpoint.

One committee member would like to point out that Illustration B reads as if the old plan was inherently evil. This type of bias should not be part of disclosure that meets our professional standards.

Several committee members recommend including the following types of illustrations in addition to those already provided, where:

1. Participants are to choose among two or more retirement plan alternatives.
2. A change is made to a DB and DC plan, such as a change to a cash balance plan and adding a match to a 401(k) plan.
3. A software tool has been developed.

Conclusion

In summary, there is a definite lack of agreement among the committee members on the provisions of this ASOP. We are concerned about moving ahead with this standard in light of our obvious disagreements and lack of unanimity. A few committee members see the value of an AOC, but feel that it is too restrictive and would seldom be used as proposed in the ED. These members recommend starting by focusing on a bigger picture first. Specifically, they suggest starting with developing an ASOP for projecting benefits, before the focus is narrowed to benefit projections in the context of plan amendments.

Should the ASB proceed with this proposed ASOP, some committee members recommend a two-tier approach, with a mandatory minimum requirement and an elective standard to be followed when an AOC is issued. This two-tier approach would provide clear guidance whether or not an AOC is issued.

These members also feel that a second ED, outlining the mandatory minimum requirements, may be appropriate, if this approach is adopted.

Some committee members also feel that the wear away section should be expanded and that the assumption sections should be modified to be consistent with prior ASOPs.

Some committee members recommend trying the examples out on some focus groups.

We would be pleased to discuss these comments with you. If you have any specific questions, please feel free to contact me directly.

Sincerely,

Donald J. Segal, Chairperson
Pension Committee

[The following members of the Pension Committee participated in the drafting of this letter: Chester D. Andrzejewski, Richard J. Barney, Dennis J. Graf, David R. Kass, Ethan E. Kra, Lisa A. Larsen, Christine T. Mahoney, Brian N. O'Konski, Lane B. West, Carolyn E. Zimmerman]

The American Academy of Actuaries is the public policy organization for actuaries practicing in all specialties within the United States. A major purpose of the Academy is to act as the public information organization for the profession. The Academy is non-partisan and assists the public policy process through the presentation of clear and objective actuarial analysis. The Academy regularly prepares testimony for Congress, provides information to federal elected officials, comments on proposed federal regulations, and works closely with state officials on issues related to insurance. The Academy also develops and upholds actuarial standards of conduct, qualification and practice, and the Code of Professional Conduct for all actuaries practicing in the United States.