

Title of Exposure Draft: ASOP 41: Actuarial Communications

Comment Deadline: June 1, 2026

Instructions: Please review the exposure draft and give the ASB the benefit of your recommendations by completing this comment template. Please fill out the tables within the section below, adding rows as necessary. Sample for completing the template provided at the following link:

Each completed comment template received by the comment deadline will receive consideration by the drafting committee and the ASB. The ASB accepts comments by email. Please send to comments@actuary.org and include the phrase 'ASB COMMENTS' in the subject line. Please note: Any email not containing this exact phrase in the subject line will be deleted by our system's spam filter.

The ASB posts all signed comments received to its website to encourage transparency and dialogue. Comments received after the deadline may not be considered. Anonymous comments will not be considered by the ASB nor posted to the website. Comments will be posted in the order that they are received. The ASB disclaims any responsibility for the content of the comments, which are solely the responsibility of those who submit them.

Restating comments verbatim or with slight variations may slow down the ASB review process. If you wish to reinforce any comments provided in another commentator's submission, please clearly state how your comments agree or differ.

I. Identification:

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| Name of Commentator or Company |
| Life Practice Council |

II. ASB Questions (If Any). Responses to any transmittal memorandum questions should be entered below.

| Question No. | Commentator Response |
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III. Specific Recommendations:

| Section # (e.g. 3.2.a) | Commentator Recommendation (Please provide recommended wording for any suggested changes) | Commentator Rationale (Support for the recommendation) |
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| 2.9 | Subsequent Events - Events that occur after the Information Date or whose effects become known to the actuary after the Information Date, and that may have a material effect on the actuary's Statement of Actuarial Opinion. | We recommend clarifying the definition of Subsequent Events. As currently drafted, the three conditions could create ambiguity in situations where an event occurs on or before the Information Date, but its material implications only become known to the actuary afterward. |
| 3.3 | Replace the last sentence with " <u>If appropriate, the actuary should also indicate the extent to which the actuary or other sources are available to provide</u> | The change seemed more concise while still allowing for actuarial judgement and was clearer to the group. |

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| | <u>supplementary information and explanation to the intended users.</u> | |
| 3.5 | We suggest removing “possible” When issuing an actuarial communication, the actuary should include information regarding possible uncertainty or risk, as appropriate to the particular circumstances and the needs of the intended users | We are concerned that using “possible” overrides the ability of the actuary to determine the level of materiality of the risk which is where the actuary is expected to focus based on ASOP 1. It can be quite challenging to address each “possible” risk, whether they are material or immaterial. |
| 4.2.d | Suggest rewording to “Any relationship or circumstance not readily apparent to the intended users that could reasonably be expected to impair or have the potential to impair the actuary’s independence, including a financial or organizational relationship, with respect to the actuarial report. | Matches more with Precept 7, which includes actual and potential conflicts of interest. We also are curious why use of the words “conflict of interest” were not used since it is in the code of conduct and seemed to be the concept that is being captured here. |
| 4.2.e | We suggest adding “(s)” to statement to read “the statement(s) of actuarial opinion” | There is the potential for multiple statements of actuarial opinion. |
| 4.2.i.5i & 4.2.i.5.ii | We suggest either: 1. combining 4.2.i.5.i and 4.2.i.5.ii as follows since they are closely related. “i. a statement that the actuary has reviewed the assumption or method and finds that it is reasonable or does not significantly conflict with what would be reasonable for the purpose of the actuary’s assignment;” OR 2. Updating 4.2.i.5.ii. as follows: “a statement that <u>the actuary has reviewed the assumption or method and it</u> does not significantly conflict with what, in the actuary’s professional judgment, would be reasonable for the purpose of the actuary’s assignment” | If the ultimate result is the same, the reason for the ultimate result could be included in a single disclosure. If the two provisions are not combined, amend ii. to include language of has been reviewed from i. |

IV. General Recommendations (If Any):

| Commentator Recommendation (Identify relevant sections when possible) | Commentator Rationale (Support for the recommendation) |
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| We request clarification on the intended scope of the standard. Does ASOP 41 apply only to communications issued by an actuary with respect to actuarial services that the actuary (or other actuaries) has personally provided, or does it also apply when an actuary issues a communication regarding actuarial services performed by a non-actuary? | The definitions of actuarial communication and actuarial services may together imply that any communication issued by an actuary with respect to professional services provided by a non-actuary who is acting in the capacity of an actuary constitutes an actuarial communication. The scope section may hence imply that the standard applies to actuaries when issuing a communication with respect to some professional services provided by non-actuaries. |

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| <p>Clarify what is “individual acting in the capacity of an actuary” and an “actuarial consideration” are.</p> | <p>“Actuarial services” is defined as “...an individual acting in the capacity of an actuary...based upon actuarial considerations”. We understand that these are consistent with the code and ASOP 1, but it is unclear when someone is performing such services and what an actuarial consideration is.</p> |
| <p>Consider how an actuary may be able to disclose if a method or assumption prescribed by law may or may not be reasonable.</p> | <p>We are concerned that when an assumption or method prescribed by law is not reasonable, there is no requirement to state such concern when it may be useful for the intended user to know. For example, waiver of premium reserves use tables that have not been revised for a long time, but they are prescribed by law. If the intended user is a regulator, should the actuary assume the regulator is adequately informed around the prescribed by law assumption/method and its reasonableness?</p> |

V. Signature:

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| <p>Commentator Signature</p> | <p>Date</p> |
| <p>Kirsten Pedersen, Vice President, Chairperson, Life Practice Council</p> | <p>6/3/2026</p> |