

ASOP 41: Actuarial Communications Third Exposure Draft

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:

Name of Commentator or Company
American Academy of Actuaries Health Practice Council

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

Question No.	Commentator Response

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)
2.4	<p>Suggested revisions to definition of Intended User:</p> <p>Intended User – Any person or entity who the actuary identifies as the primary audience expected to utilize an actuarial communication. An intended user may be a person or entity that is internal or external to the actuary's principal. Regulators should be considered intended users of actuarial communications supporting a regulatory filing.</p>	<p>The change to the first sentence is to address a concern from the HPC that the term "rely" is not defined within ASOP 41 and could provide undue expectations on the actuary for some intended users (especially those who are not the principal).</p> <p>The use of the term "primary audience" is to acknowledge that there are other entities that may utilize the actuarial communication for a variety of purposes (researchers for example), and the actuary does not have any obligation to</p>

		<p>those users (unless it's prescribed by the principal).</p> <p>The second sentence as written in the exposure draft implies there are multiple intended users. Suggested changes make it clearer that there could be one or multiple intended users.</p> <p>The third sentence was added to ensure that the clarification in the first sentence did not impact the status of regulators as an intended user of actuarial communications associated with regulatory filings, even when they are not the primary audience.</p>

IV. General Recommendations (If Any):

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)

V. Signature:

Commentator Signature	Date
Annette V James, MAAA, FSA, FCA Vice President, Health, American Academy of Actuaries, on behalf of the Health Practice Council	06/01/2026