2000—Insurance

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2100 Insurance Contract Valuation: All Insurance

2110 Scope

- .00 Part 1000 applies to work within the scope of this section 2100.
- .01 Sections 2100, 2200 and 2300 apply to the valuation of the <u>insurance contract liabilities</u> and of the <u>reinsurance recoverables</u> in an <u>insurer's</u> financial statements when the intent is that those statements be in accordance with accounting principles generally accepted in Canada. Effective for financial years beginning on or after January 1, 2011, the Canadian Institute of Chartered Accountants Handbook will contain both Canadian generally accepted accounting principles applicable to publicly accountable enterprises (being International Financial Reporting Standards incorporated into the Canadian Institute of Chartered Accountants Handbook) and Canadian generally accepted accounting principles applicable to private enterprises.
- .01.1 Part 2000 does not apply to post-employment benefit plans covered by the Practice-Specific Standards for Post-Employment Benefit Plans and does not apply to personal injury compensation plans covered by the Practice-Specific Standards for Public Personal Injury Compensation Plans.
- .02 Section 2100 applies to all kinds of insurance.
- .02.1 Sections 2200 and 2300, following, apply respectively to

property and casualty insurance, and

life and health (accident and sickness) insurance; that is, to insurance with respect to the life and health of persons other than corporations.

.03 Sometimes, however, techniques described in one section may be useful for the insurance to which the other section applies. For example, while a simple technique is usually appropriate for valuation of life and health insurance <u>claim liabilities</u>, the more sophisticated techniques for valuation of <u>property and casualty insurance claim liabilities</u> may be appropriate for life and health insurance whose claim <u>development</u> is complex. Another example is that a simple technique may be appropriate for travel insurance and other short-term policies sold by property and casualty <u>insurers</u>.

2120 Extension of scope

- .01 Repealed
- .02 Repealed

- .03 Part 2000 also applies to the <u>work</u> of, and the <u>report</u> thereon prepared by, an <u>actuary</u> for purposes of the financial statements of an <u>insurer</u> that is not a publicly accountable entity, as long as the intent is that those financial statements be prepared in accordance with generally accepted accounting principles (GAAP) applicable to that <u>insurer</u>. The <u>actuary</u> would modify the standards to take account of any substantive difference between the <u>insurer</u> and a publicly accountable enterprise; for example the <u>insurer's</u> liabilities may be permitted to be less than fully <u>funded</u>. The <u>actuary's report</u> would describe the modifications to the standards and their implications.
- .04 Part 2000 also applies to the <u>work</u> of an <u>actuary</u> with respect to the valuation of <u>policy liabilities</u> where statutory or regulatory instructions require the <u>actuary</u> to do so, other than the preparation of financial statements in accordance with generally accepted accounting principles.
- .05 Since an <u>insurer</u> is defined as the party that has an obligation to compensate a <u>policyholder</u> if an insured event occurs, the legal form of the <u>insurer</u> is unimportant for purposes of the determination of the <u>policy liabilities</u>.
- .06 Part 2000 also applies to the <u>work</u> of, and the <u>report</u> thereon prepared by, an <u>actuary</u> with respect to the valuation of the <u>policy liabilities</u> of any party that

has an obligation under a policy, and

has the intent to prepare financial statements in accordance with applicable Canadian generally accepted accounting principles (other than International Financial Reporting Standards).

.07 Where an <u>actuary</u> is valuing, and <u>reporting</u> on the valuation of, <u>policy liabilities</u> other than in compliance with International Financial Reporting Standards, the <u>policy liabilities</u> may be <u>reported</u> net of <u>reinsurance recoverables</u>.

2130 Method

- .01 The <u>actuary</u> should value the <u>insurance contract liabilities</u> and the <u>reinsurance recoverables</u> for the balance sheet and the changes in them for the income statement.
- .02 The <u>actuary</u> should co-ordinate the valuation with the <u>insurer's</u> accounting policy as respects the choice between going concern and wind-up accounting, and so that the <u>insurance contract</u> <u>liabilities</u>, <u>reinsurance recoverables</u>, and other items in the balance sheet

are consistent,

avoid omission and double counting, and

conform to the presentation of the income statement.

- .03 The relevant <u>insurance contracts</u> for the valuation are those that are in force, including those whose issue is then committed, at the balance sheet date, or that were in force earlier and that will generate cash flow after the balance sheet date.
- .04 The <u>insurance contract liabilities</u>, net of <u>reinsurance recoverables</u>, in respect of each of the relevant <u>insurance contracts</u> should be comprised of the cash flow after the balance sheet date from the premiums, benefits, claims, expenses, and taxes that are incurred during the term of its liabilities.
- .05 The cash flows that comprise the <u>insurance contract liabilities</u> should include the effect of
 - retrospective premium, commission, and similar adjustments,
 - experience rating refunds,
 - reinsurance ceded,
 - subrogation and salvage,
 - the exercise of policy owner options, and
 - the deemed termination at the end of the term of its liabilities of each policy then in force.
- .06 The valuation should take account of the time value of money.
- .06.1 The <u>actuary</u> should ensure that the application of <u>margins for adverse deviations</u> with respect to the <u>insurance contract liabilities</u> and the related <u>reinsurance recoverables</u> results in an increase to the value of the liability net of reinsurance. The provision resulting from the application of all <u>margins for adverse deviations</u>, in addition to increasing the net liability, should be appropriate in the aggregate. [Effective January 1, 2011]

Terminology

- .07 "Policy" includes an <u>insurance contract</u> and any other instrument that is substantively like a policy, such as a reinsurance agreement or an annuity contract, and includes a commitment to issue a policy.
- .08 Repealed
- .09 "Premiums" include income equivalent to premiums, such as management fees, and cost of insurance charges.

The insurer's accounting policy

- .10 The preparers of the financial statements make a choice between going concern and wind-up accounting. The <u>actuary</u> would conform the valuation to that choice. If the <u>actuary</u> believes the choice to be inappropriate, then, after consultation with the auditor, he or she would so <u>report</u>. Going concern accounting is appropriate for an <u>insurer</u> that is expected to remain open to new business and in satisfactory <u>financial position</u> indefinitely. Going concern accounting is also appropriate for an <u>insurer</u> that is expected to become closed to new business, but to continue in a satisfactory <u>financial position</u>, either indefinitely or until an increase in capital, combination with another <u>insurer</u> in a satisfactory <u>financial condition</u>, or transfer of its policies to such an <u>insurer</u> brings financial relief.
- .11 Use of the terms "insurance contract liabilities", "policy liabilities", "reinsurance recoverables", "premium liabilities" and "claim liabilities" is desirable in financial statements, but the choice of the terminology and itemization is a management decision. What matters is that the actuary identify, value, and report on all of the liabilities and assets valued by the actuary, whatever they may be called in the financial statements. The differentiation between premium and claim liabilities is usually evident but is, in any case, less important than assurance that all insurance contract liabilities and reinsurance recoverable assets have been identified and valued.
- .12 <u>Insurance contract liabilities</u> and <u>reinsurance recoverables</u> consist of <u>premium liabilities</u> and <u>claim liabilities</u>. <u>Claim liabilities</u> are those in respect of cash flow after the balance sheet date from benefits and claims incurred on or before that date, and their related expenses and taxes; i.e., all of the cash flow, excluding the portion paid before the balance sheet date. <u>Premium liabilities</u> are those in respect of all other cash flow; i.e., that from premiums, benefits, claims, and their related expenses and taxes, incurred after the balance sheet date.
- .13 <u>Insurance contract liabilities</u> reported in the <u>insurer's</u> balance sheet would not be net of the value of recoveries that are expected from reinsurance ceded. The value of the <u>reinsurance recoverables</u> is recorded as an asset. Fair presentation of the <u>reported insurance contract liabilities</u> requires the amount of that asset to be appropriate. The recovery on account of reinsurance ceded would take account of not only the reinsurer's share of claims but also reinsurance commissions, allowances, retrospective premium adjustments, and the <u>financial condition</u> of the reinsurer.
- .14 The <u>insurance contract liabilities</u> reported in the <u>insurer's</u> balance sheet exclude deposit liabilities of segregated funds but include any related liabilities of the general fund, such as a liability for capital guarantees of amounts in segregated funds.

2130.10

.15 The <u>insurer's</u> accounting policy may report amounts related to the <u>insurance contracts</u> and the assets that support their <u>insurance contract liabilities</u>, such as

deposit liabilities (for example, policy dividends on deposit),

incurred but unpaid items (for example, taxes incurred but not paid and policy dividends due but not paid),

future tax liabilities and assets (for example, those in connection with the timing differences between accounting and tax liabilities),

receivables from, payables to, and deposits by reinsurers,

amounts recoverable from policy owners,

asset impairment, and

deferred policy acquisition expenses,

either as part of the <u>insurance contract liabilities</u> or as separate items in the balance sheet or as a mixture of the two. The <u>actuary</u> would value the <u>insurance contract liabilities</u> so that

in the aggregate, the <u>insurance contract liabilities</u> and those separate items are consistent and avoid omission and double counting, and

the separate reporting of those items does not affect the <u>insurer's</u> capital (i.e., assets minus liabilities).

.16 As respects consistency, the <u>actuary</u> would, for example, ensure that the <u>insurance contract</u> <u>liabilities</u>

provide consistently for cash flow gross of reinsurance and reinsurance cash flow, except that reinsurance cash flow would also take account of the <u>financial</u> condition of the reinsurer.

.17 As respects double counting and omission, the actuary would, for example, ensure that

the same assets are not allocated twice to support liabilities, and

provision for asset depreciation (C-1 risk) in valuing the <u>insurance contract</u> <u>liabilities</u> does not duplicate any provision for asset depreciation deducted from the asset side of the balance sheet.

Relevant policies

.18 The relevant policies for the valuation are those that are in force at the balance sheet date, including those whose issue is then committed, or that were in force earlier and that will generate cash flow after the balance sheet date. There are no amounts included in insurance insurance contract liabilities in the financial statements in respect of other policies expected to be issued after that date, whether or not they are expected to be profitable.

- .19 There usually are both <u>premium liabilities</u> and <u>claim liabilities</u> in respect of policies that are in force at the balance sheet date. There may be <u>reinsurance recoverables</u> in respect of <u>insurance contracts</u> that are in force at the balance sheet date.
- .20 There may be <u>claim liabilities</u> in respect of policies that are not in force at the balance sheet date as a result of outstanding claims incurred while they were in force. There may be <u>premium liabilities</u> in respect of those policies as a result of the right of policy owners to reinstate them, or of their unpaid

retrospective premium, commission, and similar adjustments,

experience rating refunds, and

subrogation and salvage.

There may be <u>reinsurance recoverables</u> related to policies that are not in force at the balance sheet date as a result of outstanding claims incurred while they were in force.

Term of the liabilities

.21 The term of the liabilities of a <u>property and casualty insurance</u> policy ends at its expiry, which usually is within one year of the balance sheet date, unless for example

the policy has been cancelled, in which case that term ends at the effective date of cancellation, or

the contractual term of the policy exceeds one year; for example, an extended warranty policy which provides coverage for several years after expiry of the basic warranty.

Paragraphs 2320.16 through 2320.27 provide guidance on determination of the term of the liabilities of a life or health insurance policy.

Cash flows comprising the insurance contract liabilities

- .22 The <u>insurance contract liabilities</u> in respect of a relevant policy are comprised of all of that policy's cash flows after the balance sheet date, except for cash flows from premiums, benefits, claims, expenses, and taxes that are incurred after the term of the liability for that policy.
- .23 The tax cash flows are limited to those generated by premiums, benefits, claims, and expenses, and by the assets that support the <u>insurance contract liabilities</u>. The expense cash flows are limited to those generated by the relevant policies, including overhead allocations. The tax and expense cash flows exclude, for example, tax on investment income from, and the investment expense of, assets that support capital.

.24 The cash flows of which a policy is comprised may extend beyond the term of its liabilities as a result of lag between incurral and the resultant cash flow. The extension may be prolonged, for example, for a claim payable in instalments under long-term disability insurance, and a claim under product liability insurance that has a long settlement period.

Retrospective premium, commission, and similar adjustments

.25 In determining the value of a contractual right of the <u>insurer</u> to future premiums that depend on past claims experience, the actuary would take account of credit risk of the policy owner.

Experience rating refunds

.26 The liability for experience rating refunds would take account of

the assumptions in calculating the <u>insurance contract liabilities</u> in respect of those matters which determine experience rating refunds,

the difference between the basis for the <u>insurance contract liabilities</u> and the corresponding basis in the experience rating, and

any cross-rating across coverages in the experience rating.

.27 The experience rating refund element of the <u>insurance contract liabilities</u> would include <u>provision for adverse deviations</u> only for

risk of misestimation (C-2 risk) of interest rates and risk of interest rate change (C-3 risk), and

uncertainty in the calculation of the experience rating refund.

- .28 The experience rating refund element of the <u>insurance contract liabilities</u> would not be negative except to the extent that in settlement it may be offset against another liability or recovered from policy owners.
- .29 Where an <u>insurer</u> holds an asset for an accrued experience rating deficit, the <u>actuary</u> would test the appropriateness and recoverability of the receivable amount using the valuation assumptions and methodology for experience rating refunds, and make an adjustment to the <u>insurance contract liabilities</u> if necessary.

Reinsurance ceded and retroceded

- .30 The recovery on account of reinsurance ceded would take account of the <u>financial condition</u> of the reinsurer.
- .31 The <u>actuary</u> would assume that the <u>insurer</u> and the reinsurer each exercises its control over recapture, cancellation or commutation to its advantage.
- .32 The sign (positive or negative) of an assumption's <u>margin for adverse deviations</u> may depend on that assumption's effect on recapture, cancellation or commutation.

Subrogation and salvage

.33 The <u>actuary</u> would either net subrogation and salvage amounts against claims or value them as a separate item, depending on the <u>insurer's</u> accounting policy.

Exercise of policy owner options

.34 Examples of policy owner options are

the conversion of group insurance or individual term insurance,

the election of a settlement option in individual life insurance,

the purchase of additional insurance or coverage without underwriting, and

the selection of the amount of premiums for universal life insurance.

Deemed termination of remaining policies

.35 The comprised cash flow in respect of a policy that is deemed to terminate at the end of the term of its liabilities would include any amount then payable by the <u>insurer</u> in the event of its termination, modified to take account of the fact that the termination is deemed and not actual. For example, the modification would

forego a surrender charge deducted at an actual termination from the policy's account value to calculate its cash value,

forego a deduction at an actual termination from the policy's unearned premium to calculate its premium refund, and

anticipate a persistency bonus becoming payable at a date after the end of the term of the policy's liabilities if the policy remains in force to that date.

Time value of money

.36 In this context, "supporting assets" means the <u>insurer's</u> assets and asset commitments that support its <u>insurance contract liabilities</u>.

- .37 To take account of the time value of money is to express the year-by-year forecast of the cash flows of which the <u>insurance contract liabilities</u> are comprised as an equivalent single amount at the balance sheet date. There are two methods of doing so the Canadian asset liability method and the <u>actuarial present value method</u>. In the Canadian asset liability method, the amount of the <u>insurance contract liabilities</u> is the amount of their supporting assets, which reduce to zero at the last liability cash flow in the forecast of the cash flow from the assets and liabilities. The Canadian asset liability method is a "roll forward" method applicable to any <u>scenario</u>. The <u>actuarial present value method</u> is a "pull backward" method that produces the same result as the Canadian asset liability method for a particular <u>scenario</u> if present value factors, v^t, exist that replicate the investment return assumptions of that <u>scenario</u>. Such factors do not exist for complex <u>scenarios</u>; for example, a <u>scenario</u> that includes a spike in mortgage lending rates in forecast year 5.
- .38 The discount rates or the forecast of supporting assets, as the case may be, would take account of

the supporting assets at the balance sheet date and the <u>insurer's</u> policy for assetliability management after that date, and/or

assumptions about investment return after the balance sheet date.

- .39 The <u>actuary</u> would value the <u>insurance contract liabilities</u> and <u>reinsurance recoverables</u> so that, in the aggregate, they and the other policy-related items in the balance sheet take account of the time value of money.
- .40 In some cases, applicable regulation requires <u>insurance contract liabilities</u> and <u>reinsurance recoverables</u> to be valued without taking account of the time value of money; i.e., to be valued as the sum of, rather than the present value of, the cash flow after the balance sheet date. For such a case, the <u>actuary</u> would make a dual valuation of <u>insurance contract liabilities</u> and <u>reinsurance recoverables</u>:
 - A in accordance with accepted actuarial practice, and
 - B in accordance with <u>accepted actuarial practice</u> but not taking account of the time value of money, with the <u>provision for adverse deviations</u> appropriately reduced.
- .41 If A is acceptable under the applicable regulation (which would usually be the case if A is greater than or equal to B), then the <u>actuary</u> would <u>report</u> A without reservation on account of the regulation.
- .42 If A is not acceptable under the applicable regulation (which would usually be the case if A is less than B), then the <u>actuary</u> would <u>report</u> B with reservation.

2130.37

Margin for adverse deviations

.43 The <u>margin for adverse deviations</u> reflects the degree of uncertainty of the <u>best estimate</u> assumption. This uncertainty results from the risk of misestimation of and deterioration from the <u>best estimate</u> assumption. The potential for misestimation is greater when the past experience has been more volatile and hence would justify a greater margin. However, the <u>margin for adverse deviations</u> would be based on a forward-looking assessment of the expected experience and would not act as a mechanism to absorb changes in observed experience, such as changes caused by statistical fluctuations.

2140 Reporting

.01 The actuary's report should describe

the valuation and presentation of <u>policy liabilities</u> and <u>reinsurance recoverables</u> for the <u>insurer's</u> balance sheet and income statement,

the <u>actuary</u>'s opinion on the appropriateness of those liabilities and recoverables and on the fairness of their presentation, and

the <u>actuary</u>'s role in the preparation of the <u>insurer's</u> financial statements if that role is not described in those statements or their accompanying management discussion and analysis.

.02 If

the financial statements (or their accompanying management discussion and analysis) describe the <u>actuary</u>'s role in their preparation, and

the actuary can report without reservation,

then the <u>actuary</u>'s <u>report</u> should conform to the <u>standard reporting language</u>, consisting of

a scope paragraph, which describes the actuary's work, and

an opinion paragraph, which gives the <u>actuary</u>'s favourable opinion on the valuation and its presentation.

- .03 If not, the <u>actuary</u> should modify the <u>standard reporting language</u> to <u>report</u> with reservation. [Effective January 1, 2011]
- .03.1 The <u>actuary</u>'s <u>report</u> would conform to the requirements of relevant Canadian federal and provincial legislation that <u>prescribe</u> that the <u>actuary</u> value the <u>policy liabilities</u>, not only the <u>insurance contract liabilities</u> net of <u>reinsurance recoverables</u>. <u>Policy liabilities</u> other than <u>insurance contract liabilities</u> would be valued in conformity with applicable International Financial Reporting Standards and <u>accepted actuarial practice</u>, where the intent is that those financial statements be prepared in accordance with International Financial Reporting Standards.

Accounting in the balance sheet

- .04 The amount of the <u>insurance contract liabilities</u> is usually the largest amount in the balance sheet, so that its itemization is desirable.
- .05 The reference to "policy liabilities", "insurance contract liabilities" and "reinsurance recoverables" in the standard reporting language is adequate if

the notes to the financial statements or their accompanying management discussion and analysis verbally define "insurance contract liabilities" and "reinsurance recoverables", and the balance sheet presents their total amount as a separate item.

Accounting in the income statement

.06 The <u>standard reporting language</u> implies that the income statement accounts for the total change in the <u>policy liabilities</u>, consisting of the <u>insurance contract liabilities</u> and the liabilities for policies other than <u>insurance contracts</u>, during the accounting period, and that it accounts for the total change in <u>reinsurance recoverables</u>. That accounting is direct in the case of a life <u>insurer's insurance contract liabilities</u> and <u>reinsurance recoverables</u>, whose change is presented as a separate item in the income statement. That accounting may be indirect in the case of other <u>policy liabilities</u>, if their change is not separately presented, but is included within other items in the income statement. For example, the item, incurred claims, equals

claims and claim expenses paid during the accounting period, plus

<u>claim liabilities</u> (which are part of the <u>policy liabilities</u>) at the end of the accounting period, minus

claim liabilities at the beginning of the accounting period.

Disclosure of unusual situations

- .07 The items that the <u>actuary</u> values for the financial statements may be misleading if the financial statements do not present them fairly. The <u>actuary</u>'s <u>report</u> is a signal to the reader of the financial statements that there is, or is not, fair presentation.
- .08 In an unusual situation, fair presentation may require explanation of an item that the <u>actuary</u> values for the financial statements. Usually, the notes to the financial statements would provide that explanation, including, where appropriate, disclosure of the situation's effect on income and capital. Failing such explanation, the <u>actuary</u> would provide it by a reservation in <u>reporting</u>.

.09 The question, "Will explanation enhance the <u>user's</u> understanding of the <u>insurer's financial</u> <u>position?"</u> may help the <u>actuary</u> to identify such a situation. Unusual situations may include

capital appropriated on the actuary's advice,

off-balance-sheet obligations, for example, contingent <u>policy liabilities</u> in connection with market conduct,

restatement of items for preceding accounting periods,

the impracticality of restating any items that are reported in current period financial statements and that were reported inconsistently in preceding period financial statements,

inconsistency among accounting periods,

an unusual relationship between the items in current period financial statements and the expected corresponding items in future period financial statements,

a change in the method of valuation that does not have an effect in the current accounting period but that is expected to have an effect in future accounting periods,

allocation of expense or investment income to a participating account (if reported in the financial statements) other than in accordance with the method approved by the <u>actuary</u> and the <u>insurer's</u> board of directors,

a subsequent event, and

a difference between the <u>insurer's</u> present practice and that which the <u>actuary</u> assumed in valuing the <u>policy liabilities</u>.

.10 An example of the last item is the <u>actuary</u>'s assumption of a policy for setting dividend scales that differs from the <u>insurer's</u> current policy. The <u>actuary</u> would not, however, <u>report</u> the assumption of a dividend scale that is in accordance with an unchanged dividend policy. The same applies to a difference between current and assumed policy for setting non-guaranteed cash value scales and premium rates for adjustable policies.

Consistency across accounting periods

- .11 Financial statements usually report results for one or more preceding accounting periods in addition to those for the current period. Meaningful comparability requires the financial statement items for the various periods to be consistent through the restatement of preceding period items if they were inconsistently reported in the preceding period financial statements. A less desirable alternative to restatement is disclosure of the inconsistency.
- .12 A change in the method of valuation creates an inconsistency. If a change in the assumptions for valuation reflects a change in the expected outlook, then it does not create an inconsistency although, if its effect is major, then fair presentation may require its disclosure.

.13 A change in assumptions that results from the application of <u>new standards</u> may create an inconsistency.

Communication with the auditor

.14 Communication with the auditor is desirable at various stages of the actuary's work. These include

use of work in accordance with the CIA/CICA Joint Policy Statement, the drafting of common features in the auditor's report and <u>actuary</u>'s <u>report</u>, the drafting of a report with reservations,

the presentation of the <u>insurance contract liabilities</u>, <u>policy liabilities</u> other than <u>insurance contract liabilities</u>, and the <u>reinsurance recoverables</u>, and

the treatment of subsequent events.

Description of the actuary's role

.15 The <u>actuary</u> would <u>report</u> a description of his or her role in the preparation of the <u>insurer</u>'s financial statements only if the financial statements or their accompanying management discussion and analysis do not provide that description.

.16 Here is an illustrative description.

"The Appointed Actuary is

appointed by the [Board of Directors] of [the Company];

responsible for ensuring that the assumptions and methods for the valuation of policy liabilities [and reinsurance recoverables] are in accordance with accepted actuarial practice in Canada, applicable legislation, and associated regulations and directives;

required to provide an opinion on the appropriateness of the policy liabilities [net of reinsurance recoverables] at the balance sheet date to meet all policy obligations of [the Company]. The work to form that opinion includes an examination of the sufficiency and reliability of policy data and an analysis of the ability of the assets to support the policy liabilities; and

required each year to analyze the financial condition of the company and prepare a report for the [Board of Directors]. The analysis tests the capital adequacy of the company until [31 December xxxx] under adverse economic and business conditions."

The wording of the illustrative description conforms to the requirements of relevant Canadian federal and provincial legislation that prescribe that the actuary value the policy liabilities, not only the insurance contract liabilities. Policy liabilities other than insurance contract liabilities would be valued in conformity with applicable International Financial Reporting Standards and accepted actuarial practice.

Standard reporting language

.17 Here is the standard reporting language.

Appointed Actuary's Report

To the policyholders [and shareholders] of [the ABC Insurance Company]:

I have valued the policy liabilities [and reinsurance recoverables] of [the Company] for its [consolidated] [statement of financial position] at [31 December xxxx] and their changes in the [consolidated statement of income] for the year then ended in accordance with accepted actuarial practice in Canada including selection of appropriate assumptions and methods.

In my opinion, the amount of policy liabilities [net of reinsurance recoverables], makes appropriate provision for all policy obligations and the [consolidated] financial statements fairly present the results of the valuation.

[Montréal, Québec] [Mary F. Roe] [Report date] Fellow, Canadian Institute of Actuaries

- .18 The language in square brackets is variable and other language may be adjusted to conform to interim financial statements and to the terminology and presentation in the financial statements.
- .19 An auditor's report usually accompanies the financial statements. Uniformity of common features in the two reports will avoid confusion to readers of the financial statements. Those common features include:

Addressees. Usually, the <u>actuary</u> addresses the <u>report</u> to the <u>policyholders</u> of a mutual <u>insurer</u> and to both the <u>policyholders</u> and shareholders of a stock <u>insurer</u>.

Years referenced. Usually, the <u>actuary</u>'s <u>report</u> refers only to the current year, even though financial statements usually present results for both the current and prior years.

<u>Report date</u>. If the two <u>reports</u> have the same date, then they would take account of the same <u>subsequent events</u>.

Reservations in reporting

.20 The examples that follow are illustrative.

Self-insured organization that is not obligated to have an appointed actuary

.21 Here is an example of a <u>report</u> prepared for an under-<u>funded</u> self-insured organization that is not obligated to have an <u>appointed actuary</u>.

I have valued the outstanding claim liabilities of [the Self-Insured Liability Plan] for its balance sheet at [31 December xxxx] in accordance with accepted actuarial practice in Canada, including selection of appropriate assumptions and methods.

As explained in Note [XX], the [Plan's] self-insured liabilities are not fully funded.

In my opinion, and having regard for Note [XX], the amount of policy liabilities makes appropriate provision for all of the [Plan's] outstanding claims and the financial statements fairly present the results of the valuation.

Note [XX] would quantify and describe the <u>actuary</u>'s assumptions with respect to the asset shortfall, describe the plan, if any, for its <u>funding</u>, and explain its implications for the financial security of participants and claimants.

New appointment

.22 A newly <u>appointed actuary</u> who is unable to <u>use</u> the predecessor <u>actuary</u>'s <u>work</u>, but who has no reason to doubt its appropriateness, would modify the <u>standard reporting language</u> as follows:

I have valued the policy liabilities [and reinsurance recoverables] of [the Company] for its [consolidated] balance sheet at [31 December xxxx] and, except as noted in the following paragraph, their change in the statement of income for the year then ended in accordance with accepted actuarial practice in Canada, including selection of appropriate assumptions and methods.

I became the [appointed actuary] during the year and was unable to confirm the appropriateness of the valuation for the preceding year.

In my opinion, the amount of policy liabilities [net of reinsurance recoverables], makes appropriate provision for all policy obligations and the [consolidated] financial statements fairly present the results of the valuation. For the reason stated in the previous paragraph, I am unable to say whether or not those results are consistent with those for the preceding year.

.23 If the <u>actuary</u> doubts the appropriateness of the predecessor <u>actuary</u>'s <u>work</u> as a result of a review of it, then the <u>actuary</u> would consider a more serious reservation.

Impracticality of restatement

.24 The <u>actuary</u> would, if necessary, restate the preceding year valuation to be consistent with the current year valuation. If it is not practical to restate the preceding year valuation, then the <u>actuary</u> would modify the opinion paragraph in the <u>standard reporting language</u> as follows:

As explained in Note [XX], the method of valuation for the current year differs from that for the preceding year. In my opinion, except for that lack of consistency, the amount of policy liabilities [net of reinsurance recoverables] makes appropriate provision for all policy obligations and the [consolidated] financial statements fairly present the results of the valuation.

.25 Note [XX] would usually explain the change in the basis of valuation, explain the impracticality of applying the new basis retroactively, and disclose the effect of the change on the opening equity at the beginning of the preceding year.

Valuation does not take account of time value of money

.26 If a regulation that some or all of the <u>insurer</u>'s liabilities be valued without taking account of the time value of money requires a reservation, then the <u>actuary</u> would modify the <u>standard</u> <u>reporting language</u> as follows:

I have valued the policy liabilities [and reinsurance recoverables] of [the Company] for its [consolidated] balance sheet at [31 December xxxx] and their change in the statement of income for the year then ended in accordance with accepted actuarial practice in Canada, including the selection of appropriate assumptions and methods, except as described in the following paragraph.

In accepted actuarial practice in Canada, the valuation of policy liabilities [and reinsurance recoverables] reflects the time value of money. Pursuant to the authority granted by the Insurance Companies Act, the Superintendent of Financial Institutions has directed that the valuation of some policy liabilities [and reinsurance recoverables] not reflect the time value of money. My valuation complies with that directive.

In my opinion, the amount of policy liabilities [net of reinsurance recoverables] makes appropriate provision for all policy obligations, except as noted in the previous paragraph, and the [consolidated] financial statements fairly present the results of the valuation.

Takeover of insurer with poor records

.27 If the <u>insurer</u> took over another <u>insurer</u> with poor records, then the <u>actuary</u> would modify the <u>standard reporting language</u> as follows:

I have valued the policy liabilities [and reinsurance recoverables] of [the Company] for its [consolidated] balance sheet at [31 December xxxx] and their change in the statement of income for the year then ended in accordance with accepted actuarial practice in Canada, including selection of appropriate assumptions and methods, except as described in the following paragraph.

During the year, [the Company] took over the assets, liabilities, and policies of [WWW Insurer], whose policy records are, in my opinion, unreliable. [The Company] is making but has not completed the necessary improvements. My valuation with respect to the policies taken over from [WWW Insurer] is therefore uncertain. Their policy liabilities [net of reinsurance recoverables] comprise [N]% of the total policy liabilities [net of reinsurance recoverables] at [31 December xxxx].

In my opinion, except for the reservation in the previous paragraph, the amount of policy liabilities [net of reinsurance recoverables] makes appropriate provision for all policy obligations and the [consolidated] financial statements fairly present the results of the valuation.

Liabilities greater than those calculated by the actuary

.28 If the financial statements of an <u>insurer report policy liabilities</u> net of <u>reinsurance recoverables</u>, that are greater than those calculated and <u>reported</u> by the <u>actuary</u>, and if the notes to those financial statements do not provide sufficient disclosure of the rationale for the greater liabilities, then the <u>actuary</u> would <u>report</u> as follows:

I have valued the policy liabilities [and reinsurance recoverables] of [the Company] for its [consolidated] balance sheet at [31 December xxxx] and their change in the statement of income for the year then ended in accordance with accepted actuarial practice in Canada, including selection of appropriate assumptions and methods, except as described in the following paragraph.

In my valuation, the amount of the policy liabilities [net of reinsurance recoverables] is $\{X\}$. The corresponding amount in the [consolidated] financial statements is $\{Y\}$.

In my opinion, the amount of policy liabilities [net of reinsurance recoverables] of \$[X] makes appropriate provision for all policy obligations and, except as described in the preceding paragraph, the [consolidated] financial statements fairly present the result of the valuation.

2200 Insurance Contract Valuation: Property and Casualty Insurance

2210 Scope

- .01 This section 2200 applies in accordance with subsections 2110 and 2120.
- .02 Repealed

2220 Claim liabilities

- .01 The amount of the <u>claim liabilities</u> should be equal to the present value, at the balance sheet date, of cash flow on account of claims (and of related expenses and taxes) incurred before that date. [Effective January 1, 2003]
- .02 The amount of claim liabilities consists of the following components
 - the amount of the case estimates,
 - a provision (which may be positive or negative) for <u>development</u> on reported claims, including <u>claim adjustment expenses</u>, and
 - a provision for incurred but unreported claims, including <u>claim adjustment</u> <u>expenses</u>.
- .03 The <u>development</u> on reported claims compensates for the inadequacy or redundancy in <u>case</u> estimates.
- .04 The incurred but unreported claims are those not yet reported to the <u>insurer</u>, including those reported but not yet recorded.
- .05 The <u>development</u> on reported claims and the incurred but unreported claims need not be calculated separately. Some valuation methods calculate only their combined amount.
- .06 The selection of valuation methods depends on the circumstances of the case. The <u>actuary</u> would usually consider several methods, each of which involves assumptions; e.g., an assumption that the settlement patterns of the available past claims experience are uniform and the same as those of the <u>insurer's</u> future claims experience. The <u>actuary</u> would, where practical, adjust the available past claims experience in order to recognize those assumptions.

.07 The <u>actuary</u> would consider the circumstances of the case in selecting assumptions. The available past claims experience may lack pertinence for assumptions about the <u>insurer's</u> future claims experience as a result of internal changes, such as changes in

the insurer's underwriting practice,

its claims handling practice, including case estimate practice,

its reinsurance,

its data processing, and

its accounting,

and as a result of external changes, such as inflation and changes in

the legal, regulatory, and legislative environment, or

residual insurers, like the Facility Association.

.08 The past and future claims experience of a pool or association in which the <u>insurer</u> participates tends to be beyond the <u>insurer</u>'s control and may differ from the <u>insurer</u>'s own claims experience.

2230 Premium liabilities

- .01 The amount of the <u>premium liabilities</u> (after deducting any deferred policy acquisition expense asset) should be equal to the present value, at the balance sheet date, of cash flow on account of premium <u>development</u> and of the claims, expenses, and taxes to be incurred after that date on account of the policies in force at that date or an earlier date. [Effective January 1, 2003]
- .02 The <u>actuary</u> would consider the Standards of Practice for <u>claim liabilities</u> in selecting assumptions about claims.
- .03 Expenses include both claim adjustment expenses and the expense of servicing policies.
- .04 Premium <u>development</u> includes additional premiums such as reinstatement premiums and experience adjustments for policies with retrospective pricing.

2240 Present values

.01 The expected investment return rate for calculation of the present value of cash flow is that to be earned on the assets, taking into account <u>reinsurance recoverables</u>, that support the <u>insurance contract liabilities</u>. It depends on

the method of valuing assets and reporting investment income,

the allocation of those assets and that income among lines of business,

the return on the assets at the balance sheet date,

the yield on assets acquired after the balance sheet date,

the capital gains and losses on assets sold after the balance sheet date, and

investment expenses, and losses from default (C-1 risk).

.02 The <u>actuary</u> need not verify the existence and ownership of the assets at the balance sheet date, but would consider their quality.

2250 Margin for adverse deviations – general

.01 The criteria for selection of the <u>margin for adverse deviations</u> for an assumption are the considerations for that assumption. The selected <u>margin for adverse deviations</u> used in the valuation of <u>insurance contract liabilities</u> should tend toward a higher <u>margin for adverse deviations</u> to the extent that the considerations for that assumption, viewed in the aggregate but considering their individual relative importance,

have been unstable during the period covered by the experience data on which the selection of the corresponding expected assumption is based and the effect of that instability cannot be quantified, or,

otherwise undermine confidence in the selection of the corresponding expected assumption,

and should tend toward a lower <u>margin for adverse deviations</u> to the extent that the opposite is the case.

.02 The selected margin for adverse deviations should vary

between premium liabilities and claim liabilities,

among lines of business, and

among accident years, policy years, or underwriting years, as the case may be,

according to how those considerations so vary. [Effective December 31, 2009]

Assumptions subject to a margin for adverse deviations

.03 The actuary would include a margin for adverse deviations in the assumptions for

claims development,

recovery from reinsurance ceded, and

investment return rates.

Expression of a margin for adverse deviations

- .04 The <u>margin for adverse deviations</u> for claims <u>development</u> would be a percentage of the <u>claim</u> <u>liabilities</u> excluding <u>provision for adverse deviations</u>.
- .05 The <u>margin for adverse deviations</u> for recovery from reinsurance ceded would be a percentage of the amount deducted on account of reinsurance ceded in calculating the <u>premium liabilities</u> or <u>claim liabilities</u>, as the case may be, excluding <u>provision for adverse deviations</u>.
- .06 The <u>margin for adverse deviations</u> for investment return rate would be a deduction from the expected investment return rate per year.
- .07 The <u>actuary</u> would not usually include a <u>margin for adverse deviations</u> in the other assumptions. An example of an unusual circumstances that warrants an exception is
 - a salvage and subrogation assumption when presented as an asset separate from the <u>claim liabilities</u>.

Considerations

.08 The <u>actuary</u> would select and evaluate considerations for each assumption that are appropriate to the circumstances of the <u>insurer</u>, including

<u>insurer</u> practices, for example, the guidelines for setting and reviewing <u>case</u> <u>estimates</u>,

data, for example, the stability of claims frequency and average claim cost,

reinsurance, for example, the history of claim and coverage disputes with reinsurers,

investments, for example, the matching of assets and liabilities and risk of asset default, and

the external environment, for example, the effect of regulatory change on claim settlements.

.09 A consideration for an assumption generates a lack of confidence in that assumption as a result of past or future instability of the consideration or a shortcoming in its quality, quantity, or performance. Significant considerations indicating difficulties in properly estimating the <u>best</u> <u>estimate</u> assumption would include

instability in the guidelines for setting and reviewing <u>case estimates</u> possibly resulting in inconsistent <u>development</u> among accident years,

the <u>credibility</u> of the company's experience being too low to be the primary source of data,

future experience being difficult to estimate,

lack of homogeneity in the cohort of risks,

operational risks adversely affecting the likelihood of obtaining the <u>best estimate</u> assumption,

past experience not being representative of the future experience and the experience possibly deteriorating, or

the derivation of the best estimate assumption being unrefined.

Other significant considerations may exist, but would be tied to specific assumptions.

2260 Margin for adverse deviations - deterministic analysis

- .01 The <u>actuary</u> should select a <u>margin for adverse deviations</u> for an assumption that is at least as much as the amount defined by the low <u>margin for adverse deviations</u> and is not excessive. [Effective December 31, 2009]
- .02 The range of margin for adverse deviations would be,

	<u>High</u>	<u>Low</u>
claims <u>development</u>	20%	2.5%
recovery from reinsurance ceded	15%	0
investment return rates	200 basis points	25 basis points

- .03 Usually, a selection above this high margin for adverse deviations would be considered excessive.
- .04 A selection above this high <u>margin for adverse deviations</u> would be appropriate, however, for unusually high uncertainty or when the resulting <u>provision for adverse deviations</u> is unreasonably low because the <u>margin for adverse deviations</u> is expressed as a percentage and the <u>best estimate</u> is unusually low.
- .05 A selection below the low <u>margin for adverse deviations</u> may be appropriate in unusual situations. For example, in a situation wherein the <u>best estimate</u> discount rate based on the <u>insurer</u>'s asset portfolio is less than 0.25% per annum, a <u>margin for adverse deviations</u> for investment return rates below that specified in paragraph 2260.02 may be reasonable. Similarly, unique situations may support a <u>claims development margin for adverse deviations</u> below that specified in paragraph 2260.02, as in the cases of a reinsurer in runoff where all remaining treaties are commuted, or of an <u>insurer</u> with aggregate stop loss coverage that is reserved at the stop loss limit.

2270 Margin for adverse deviations - stochastic analysis

.01 The <u>margin for adverse deviations</u> selected based on stochastic techniques should not be less than the low <u>margin for adverse deviations</u> set out in paragraph 2260.02 and should not be excessive. [Effective December 31, 2009]

2270.02

- .02 It is expected that <u>margins for adverse deviations</u> obtained using stochastic techniques would generally be consistent with the range provided in paragraph 2260.02.
- .03 In addition to the circumstances described in paragraph 2260.04, a selection above the high margin for adverse deviations set out in paragraph 2260.02 may be appropriate when stochastic modeling indicates variability in estimates of insurance contract liabilities that may not be identified using deterministic analysis.
- .04 A selection below the low <u>margin for adverse deviations</u> may be appropriate in unusual situations. For example, in a situation wherein the <u>best estimate</u> discount rate based on the <u>insurer</u>'s asset portfolio is less than 0.25% per annum, a <u>margin for adverse deviations</u> for investment return rates below that specified in paragraph 2260.02 may be reasonable. Similarly, unique situations may support a <u>claims development margin for adverse deviations</u> below that specified in paragraph 2260.02, as in the cases of a reinsurer in runoff where all remaining treaties are commuted, or of an <u>insurer</u> with aggregate stop loss coverage that is reserved at the stop loss limit.

2300 Insurance Contract Valuation: Life and health (accident and sickness) insurance

2310 Scope

.01 This section 2300 applies in accordance with subsections 2110 and 2120.

2320 Method

- .01 The <u>actuary</u> should calculate <u>insurance contract liabilities</u> net of <u>reinsurance recoverables</u> by the Canadian asset liability method. For valuation of the general account <u>insurance contract liability</u> associated with segregated fund guarantees, the <u>actuary</u> should calculate the <u>insurance contract liability</u> for the guarantee elements by the Canadian asset liability method using stochastic modelling.
- .02 The amount of <u>insurance contract liabilities</u> using the Canadian asset liability method for a particular <u>scenario</u> is equal to the amount of supporting assets, including <u>reinsurance</u> <u>recoverables</u>, at the balance sheet date that are forecasted to reduce to zero coincident with the last liability cash flow in that <u>scenario</u>.
- .03 The term of the liabilities should take account of any renewal, or any adjustment equivalent to renewal, after the balance sheet date if
 - the <u>insurer's</u> discretion at that renewal or adjustment is contractually constrained, and
 - <u>insurance contract liabilities</u> are larger as a result of taking account of that renewal or adjustment.
- .04 In forecasting the cash flow expected to be generated by the <u>insurance contract liabilities</u>, the <u>actuary</u> should
 - take account of policy owner reasonable expectations, and
 - include policy dividends, other than the related transfers to the shareholders account and other than ownership dividends, in the comprised cash flow from benefits.
- .05 The <u>actuary</u> should calculate <u>insurance contract liabilities</u> for multiple <u>scenarios</u> and adopt a <u>scenario</u> whose <u>insurance contract liabilities</u> make sufficient but not excessive provision for the <u>insurer's</u> obligations in respect of the relevant policies.

.06 The assumptions for a particular scenario consist of

<u>scenario</u>-tested assumptions, which should include no <u>margin for adverse</u> <u>deviations</u>, and

each other needed assumption, whose <u>best estimate</u> should be consistent with the <u>scenario</u>-tested assumptions and which should include <u>margin for adverse deviations</u>.

- .07 The <u>scenario</u>-tested assumptions should include at least the interest rate assumptions.
- .08 The scenarios of interest rate assumptions should comprise

a base <u>scenario</u>, as defined under paragraph 2330.09.1, each of the <u>prescribed scenarios</u> in a deterministic application, ranges that comprehend each of the <u>prescribed scenarios</u> in a stochastic application, and

other <u>scenarios</u> appropriate for the circumstances of the <u>insurer</u>. [Effective January 1, 2011]

.08.1 For stochastic modelling, the development of <u>scenarios</u> of risk-free interest rates and investment returns should consider

selection of market indices and proxies, development of economic <u>scenario</u> generators and model parameters, and calibration of risk-free interest rates and investment returns (i.e., equity returns, bond fund returns and money market returns). [Effective October 15, 2014]

.08.2 If the bifurcated approach is used for valuation of the general account insurance contract liability associated with segregated fund guarantees, the allocation of future fee revenue between amortization of the allowance for acquisition expense and the guarantee should not change from period to period. [Effective January 1, 2011]

Liability grouping and asset segmentation

.09 The <u>actuary</u> would usually apply the Canadian asset liability method to policies in groups that reflect the <u>insurer's</u> asset-liability management practice for allocation of assets to liabilities and investment strategy. That application is a convenience, however, that would not militate against calculation of <u>insurance contract liabilities</u> and <u>reinsurance recoverables</u> that, in the aggregate, reflect the risks to which the <u>insurer</u> is exposed.

Other methods

- .10 For a particular <u>scenario</u>, another method may be equivalent to or approximate, the Canadian asset liability method. If the <u>actuary</u> uses that other method, then the calculation for multiple <u>scenarios</u> and the selection of one that makes sufficient but not excessive provision for the <u>insurer's</u> obligations would be the same as for the Canadian asset liability method.
- .10.1 For valuation of the general account <u>insurance contract liability</u> associated with segregated fund guarantees, a factor-based approach, approved by a regulator, would be considered an appropriate approximation and the <u>actuary</u> would not need to undertake testing to determine the appropriateness of this approximation.
- .10.2 Two approaches would be appropriate to value segregated fund policies where both additional benefits or guarantees are involved and the allowance for acquisition expense is being amortized.

For the bifurcated approach, management expense cash flow is allocated between recoverability testing of the allowance for acquisition expense and the liability for the guarantee. The portion allocated to the guarantee would generally be based on the additional charge priced into the product for that guarantee with the remainder applied to amortize the remaining unamortized allowance for acquisition expense. The <u>insurance contract liability</u> for the guarantee is calculated separately using the net cash flows available for the guarantee while the recoverability of the allowance for acquisition expense is tested excluding those revenues allocated to guarantee.

For the whole contract approach, all general account net cash flows associated with segregated funds are considered in calculating the total liability. This total liability will change over the <u>reporting</u> period as a result of market movements and other factors and, therefore, may need to be adjusted to remove any write-up to the balance of the allowance for acquisition expense.

Supporting assets

.11 In allocating assets to support liabilities, the <u>actuary</u> would preserve the connection between unamortized capital gains, both realized and unrealized, and the asset segments that generated them.

- .12 The value of the assets that support insurance contract liabilities at the balance sheet date would be their value in the <u>insurer's</u> financial statements.
- .13 The forecasted cash flow of the assets would take account of any related, off-balance sheet, financial instruments.
- .13.1 For valuation of segregated fund guarantees, the value of the assets and forecasted cash flow would take account of the <u>insurer</u>'s hedging instruments existing at the balance sheet date.
- .14 The forecast of cash flow from taxes would take account of permanent and temporary differences between the amortization of capital gains in accordance with generally accepted accounting principles and in accordance with tax law.
- .15 The assumed cash flow from policy dividends would avoid omission and double counting. For example, if the dividend scale includes distribution of a deferred realized capital gain (adjusted for any corresponding future tax asset or liability), then the assumed cash flow from policy dividends would exclude that distribution. In the opposite case, the assumed cash flow from policy dividends would provide for negative distribution of a deferred realized capital loss asset (net of any corresponding future tax liability). Such avoidance is appropriate only in the case of liabilities and would not be appropriate if the dividend scale included distribution of assets that support capital, or distribution of investment income on assets that support capital.

Term of the liabilities

- .16 If an element of a policy operates independently of the other elements, then it would be treated as a separate policy with its own term of liabilities. Examples are
 - a flexible premium deferred annuity where the interest guarantee and cash value attached to each premium are independent of those for the other premiums, and
 - a certificate of voluntary non-contributory association or creditor group insurance.
- .17 The term of a policy's liabilities is not necessarily the same as the contractual term of the policy.

.18 In this context,

"renewal" means the renewal of a policy at the end of its term, with the <u>insurer</u> having discretion to adjust premiums or coverage for the new term,

"adjustment" means an <u>insurer's</u> adjustment to a policy's coverage or premiums equivalent to that in a renewal, and

"constraint" means a constraint on the <u>insurer's</u> exercise of discretion in renewal or adjustment that results from contractual obligations, legally binding commitments and policy owner reasonable expectations. Examples of constraint are an obligation to renew a policy unless renewal is refused for all other policies in the same class, a guarantee of premiums, a guarantee of credited interest rate, a general account guarantee of segregated fund value, and a limitation on the amount of adjustment. "Constraint" would not include a price-competitive market expected at renewal or adjustment.

- .19 The term of a policy's liabilities takes account of all renewals and adjustments before the balance sheet date. Depending on the circumstances, that term may also take account of one or more renewals or adjustments after the balance sheet date.
- .20 If the term of the liabilities is not evident, and if selection of a longer term would reduce insurance contract liabilities, then the actuary would be cautious in making such a selection. On the other hand, if selection of a longer term would increase those liabilities, then the actuary would usually select the longer term. Substance would supersede form in the selection; for example, a universal life policy that is in form an annual premium life insurance policy may be in substance a single premium deferred annuity.

.21 The term of the liabilities of

an <u>insurance contract</u> that has been cancelled by the <u>insurer</u> ends at the effective date of cancellation,

an <u>insurance contract</u> that has not been cancelled, but that is cancellable by the <u>insurer</u> at or before the date to which its premiums have been paid, ends at that date,

an individual annual premium life or accident and sickness <u>insurance contract</u> ends at the last day to which the policy owner may prolong its coverage without the consent of the <u>insurer</u>, and

a certificate of group insurance if the group <u>insurance contract</u> is in effect a collection of individual <u>insurance contracts</u> is the same as if it were an individual <u>insurance contract</u>, unless <u>contributions</u> or experience rating of the group negate <u>anti-selection</u> by certificate holders.

.22 The term of the liabilities of any other insurance contract ends at the earlier of

the first renewal or adjustment date at or after the balance sheet date at which there is no constraint, and

the renewal or adjustment date after the balance sheet date that maximizes the insurance contract liabilities.

An exception to the above would exist for the liabilities for guarantees of the fund value for segregated fund annuities where the contracts contain material constraints. In this situation, the term of the liability ends at the date after the valuation date which maximizes the <u>insurance</u> contract <u>liabilities</u>, consistent with the treatment for contracts with no material constraints.

.23 The actuary would extend such term only

to permit recognition of cash flow to offset acquisition or similar expenses, whose recovery from cash flow that would otherwise be beyond such term was contemplated by the <u>insurer</u> in pricing the <u>insurance contract</u>, and

where the value of the additional cash flow recognized by such extension of the term cannot exceed the value of the remaining balance of acquisition or similar expenses, or

to permit reflection of hedging arrangements related to segregated fund guarantees by considering both the value of the liability and its associated hedge,

where the resulting balance sheet presentation is consistent with market movements over the reporting period, and

where such extension would be subject to constraints on the amount of cash flow capitalized, consistent with an unhedged position.

.24 The balance of the allowance for acquisition expense would be written down to zero using an appropriate method. Such method would

have a term consistent with the extended term established at inception, have a write-down pattern reasonably matched with the net cash flow available to offset these expenses at inception, and

be locked in, so that the amount of write-down in each period will not fluctuate from the expected amount established at inception provided such balance is recoverable from the additional cash flow recognized at the balance sheet date, and where not fully recoverable at the balance sheet date, is written down to the recoverable amount, with the expected amount of write-down in each future period proportionately reduced.

.25 That implies that the term ends at

the balance sheet date if the policy is continually renewable or adjustable without constraint,

the first renewal or adjustment after the balance sheet date if there is no constraint at that renewal or adjustment, and

a renewal or adjustment determined by testing for any other policy. The <u>actuary</u> would calculate the <u>insurance contract liabilities</u> assuming that the term of its liabilities ends at each renewal or adjustment at or after the balance sheet date up to and including the first renewal or adjustment at which there is no constraint, and would select the term corresponding to the largest <u>insurance</u> contract <u>liabilities</u>.

- A change in the outlook may provoke a change in the term of the <u>insurance contract's liabilities</u>. For example, the constraint of a cost of insurance guarantee that previously lengthened the term of the <u>insurance contract liabilities</u> may no longer do so if the outlook for mortality improves. On the other hand, the constraint of a guaranteed credited interest rate that previously was considered innocuous may become meaningful, and thereby lengthen the term of the <u>insurance contract liabilities</u>, if the outlook changes to one of lower interest rates.
- .27 For example, the term of the liabilities ends at

the balance sheet date for the general account portion of a deferred annuity with segregated fund liabilities but without minimum guarantees (other than a guarantee of an annuity purchase rate); for example, with no guarantee of the segregated fund value,

the date after the balance sheet date that maximizes the <u>insurance contract</u> <u>liabilities</u> for guarantees of the fund value for segregated fund annuities whose contracts have no material constraints, and for consistency, for those contracts that contain material constraints,

the first renewal (usually one year after the previous renewal) of a group policy that insures employee benefits, unless there is a constraint at that renewal, and the next renewal date or adjustment date even if there is a constraint at renewals and adjustments at and after that date, but the constraint is so weak that its operation does not increase insurance contract liabilities.

Policy owner reasonable expectations

.28 The <u>insurer's</u> policies define contractually its obligations to its policy owners. The contractual definition may leave certain matters to the <u>insurer's</u> discretion, such as

the determination of policy dividends, experience-rating refunds, and retrospective commission adjustments, and the right to adjust premiums.

.29 Matters left to the insurer's discretion implicitly include

underwriting and claim practices, and the right to waive contractual rights and to create extra-contractual obligations.

.30 Policy owner reasonable expectations are the expectations that

may be imputed to policy owners as their reasonable expectations of the <u>insurer's</u> exercise of discretion in those matters, and arise from the <u>insurer's</u> communication in marketing and administration, from its past practice, from its current policy, and from general standards of market conduct. Past practice includes the non-exercise of discretion; for example, long non-exercise without affirmation of a right to adjust premiums may undermine it. The <u>insurer's</u> communication includes policy dividend and investment performance illustrations at sale of a policy and that of intermediaries reasonably perceived as acting in its behalf.

- .31 In selecting assumptions for the <u>insurer's</u> exercise of discretion in those matters, the <u>actuary</u> would take policy owner reasonable expectations into account. Taking account of policy owner reasonable expectations may affect not only the amount of <u>insurance contract liabilities</u> but also disclosure in the financial statements.
- .32 The determination of policy owner reasonable expectations is straightforward when the insurer's practice has been clear, unvarying, consistent with its communications, consistent with general standards of market conduct, and the insurer does not intend to change it. The actuary would discuss any other practice with the insurer, with a view to clarifying policy owner reasonable expectations.
- .33 If the <u>insurer</u> makes a change that will eventually alter policy owner reasonable expectations, then the <u>actuary</u> would consider both the appropriate disclosure of the change in policy owner communication and the financial statements, and the time elapsed before the altered expectations crystallize.

.34 A dispute over policy owner reasonable expectations may lead to class action or other litigation by policy owners against the <u>insurer</u>, which may affect <u>insurance contract liabilities</u> or generate contingent liabilities.

Policy dividends

- .35 The assumed cash flow from policy dividends would be that from both periodic (usually annual) dividends and terminal and other deferred dividends, but excluding that from the related transfers from the participating to the shareholders account in a stock insurer.
- .36 The assumed cash flow from policy dividends would avoid omission and double counting with other elements of the <u>insurance contract liabilities</u> and with liabilities other than <u>insurance contract liabilities</u>. For example, if the <u>actuary</u> has valued the <u>insurance contract liabilities</u> for riders and supplementary benefits in participating policies as though they were non-participating i.e., with <u>provision for adverse deviations</u> in excess of that appropriate for participating insurance then the assumed cash flow from policy dividends would exclude the portion of that excess that is included in the dividend scale.
- .37 The selected policy dividend scales in a particular <u>scenario</u> would be consistent with the other elements of that <u>scenario</u>, but would take account of how <u>insurer</u> inertia, policy owner reasonable expectations, and market pressure may preclude the dividend scale from being responsive to changes assumed in the <u>scenario</u>. Those scales would also be consistent with the <u>insurer</u>'s dividend policy except in a <u>scenario</u> which that policy does not contemplate and which would provoke a change in it.
- .38 If the current dividend scale anticipates a future deterioration in experience, then the <u>actuary</u> would assume continuance of that scale in response to that deterioration. If the current dividend scale does not respond to a recent deterioration in experience but the <u>insurer's</u> policy is to do so, and if the delay in doing so does not provoke a contrary policy owner reasonable expectation, then the <u>actuary</u> would assume such response.
- .39 An assumption of cash dividends to all policy owners is appropriate only if the alternative options to cash have equivalent value, failing which, the <u>actuary</u> would
 - either adjust the cash dividends to reflect the non-equivalence or make explicit assumption about policy owner exercise of the various dividend options, and provide for the anti-selection that will result from increasing exercise of the more valuable options.

Forecast of cash flow

- .40 In calculating <u>insurance contract liabilities</u>, the <u>actuary</u> would allocate assets to the liabilities at the balance sheet date, forecast their cash flow after that date, and, by trial and error, adjust the allocated assets so that they reduce to zero at the last cash flow.
- .41 <u>Use</u> of the work of another person may be appropriate for forecasting the cash flow of certain assets, such as real estate.

Income tax and alternative tax

- .42 This item deals with cash flow from tax based on income (herein called "income tax") and other taxes not based on income but which interact with income tax; for example, certain capital taxes in Canada (herein called "alternative tax").
- .43 The cash flow from such taxes would be limited to that in respect of the relevant <u>insurance contracts</u> and the assets that support their <u>insurance contract liabilities</u>, and thus, with the exception of the recoverability of future tax losses described below would ignore any interaction between that cash flow and cash flow in the rest of the <u>insurer</u>; e.g., it would ignore tax on investment income from assets that support the <u>insurer</u>'s capital. For a particular <u>scenario</u>, forecasted income before tax is equal to zero in each accounting period after the balance sheet date. That is so because that <u>scenario</u> assumes occurrence of the adverse deviations for which it makes provision. If income according to tax rules were equal to income in accordance with generally accepted accounting principles, and if there were no alternative tax, then the corresponding forecasted tax cash flow would also be equal to zero. In reality, however, such tax cash flow may differ from zero because of
 - differences both temporary and permanent between income in accordance with generally accepted accounting principles and in income in accordance with tax rules,
 - the operation of carry-forward and carry-back in the tax rules, and alternative tax and the interaction between it and income tax.
- .44 An example of a temporary difference is a difference between <u>insurance contract liabilities</u> and the corresponding tax liabilities.
- .45 An example of a permanent difference is a preferential tax rate on the investment income on a class of assets.
- .46 The forecast of cash flow from such taxes would therefore take account of positive or negative tax as a result of permanent and temporary differences at, and arising after, the balance sheet date, and of alternative taxes incurred after the balance sheet date.

- .47 The resulting <u>insurance contract liabilities</u> make appropriate provision for cash flow on account of such taxes. If the <u>insurer's</u> balance sheet records a future tax asset or liability in respect of such taxes, then, in order to avoid double counting, the <u>actuary</u> would adjust the <u>insurance contract liabilities</u> otherwise calculated upward to reflect the existence of the future tax asset and downward to reflect the existence of future tax liability.
- .48 The realization of negative tax depends on the simultaneous availability of income that is otherwise taxable. In forecasting such income, the actuary would

make provision for adverse deviations,

take into account the projected tax position of the company overall, but not take account of the expected release of <u>provisions for adverse deviations</u> in the <u>insurance contract liabilities</u> because, as noted above, their calculation implicitly assumes that those adverse deviations occur.

Adverse deviations borne by policy owners

- .49 The <u>insurance contract liabilities</u> need not make <u>provision for adverse deviations</u> to the extent that the <u>insurer</u> can offset its effect by adjustments to policy dividends, premium rates, and benefits. The <u>insurer's</u> contractual right of such offset may be constrained by policy owner reasonable expectations, competition, regulation, administrative delays, and the fear of adverse publicity or <u>anti-selection</u>.
- .49.1 In some jurisdictions, regulatory approval may be required for the application of such contractual pass-through features and, in such cases, the actuary would consider the ability to recover past losses, the clarity of any regulatory rules for approval, time delays caused by the approval process, and whether interest losses during this period can be recouped in determining an appropriate total provision.

Adoption of a scenario

.50 If the selection of <u>scenarios</u> is deterministic, then the <u>actuary</u> would adopt a <u>scenario</u> whose <u>insurance contract liabilities</u> are within the upper part of the range of the <u>insurance contract liabilities</u> for the selected <u>scenarios</u>, provided, however, that the <u>insurance contract liabilities</u> would not be less than those in the <u>prescribed scenario</u> with the largest <u>insurance contract liabilities</u>.

.51 If the selection of <u>scenarios</u> is stochastic, then the <u>actuary</u> would adopt a <u>scenario</u> whose <u>insurance contract liabilities</u> are within the range defined by

the average of the <u>insurance contract liabilities</u> that are above the 60th percentile of the range of <u>insurance contract liabilities</u> for the selected <u>scenarios</u>, and the corresponding average for the 80th percentile.

Scenario-tested assumptions

.52 The <u>provision for adverse deviations</u> in respect of <u>scenario</u>-tested assumptions results from calculating the <u>insurance contract liabilities</u> for multiple <u>scenarios</u> and adopting a <u>scenario</u> whose <u>insurance contract liabilities</u> are relatively high.

Other assumptions

- .53 The <u>provision for adverse deviations</u> in respect of each assumption other than the scenariotested assumptions results from a <u>margin for adverse deviations</u> included in that assumption.
- .54 The assumptions unique to a particular <u>scenario</u> are the scenario-tested assumptions and each other assumption that is correlated with them. For example, policy dividends and the exercise of options by borrowers and issuers are strongly correlated with interest rates. Lapses may be correlated or not, depending on the circumstances. The assumption on a matter not so correlated would be common to all <u>scenarios</u>.

Margin for adverse deviations

.55 The <u>margin for adverse deviations</u> would be at least the average of the applicable high and low margin whenever at least one 'significant consideration' exists, or at least one other consideration is significant in the context of the valuation. Significant considerations vary by type of assumption and are described under subsections 2340 and 2350.

2330 Scenario Assumptions: Interest Rates

General Considerations

.01 An interest rate <u>scenario</u> comprises, for each forecast period between the balance sheet date and the last cash flow,

an investment strategy, and

an interest rate for each risk-free asset and the corresponding <u>credit spread</u> for each fixed income asset subject to depreciation.

.02 Each interest rate <u>scenario</u> would include an assumption with respect to the rate of inflation that is consistent with that <u>scenario</u>.

- .03 The interest rate scenario would be consistent among the insurer's lines of business.
- .04 The investment strategy defines reinvestment and disinvestment practice for each type, default risk classification, and term of the invested assets that support insurance contract liabilities.
 Assumption of an investment strategy implies investment decisions of reinvestment and disinvestment in accordance with that strategy and, hence, the risk inherent in that strategy.
- .05 The investment strategy for each <u>scenario</u> would be consistent with the <u>insurer's</u> current investment policy and would be consistent with the <u>insurer's</u> expected practice. The <u>insurance contract liabilities</u> would make no provision for any increased risk that may result from a future change in the <u>insurer's</u> investment policy. The <u>insurer's</u> expected practice would be determined without taking into consideration any business that could be issued after the valuation date (new sales) even for a valuation done on a going concern basis as described in paragraph 2130.02.
- .06 The <u>actuary</u> would ensure that the proportion of non-fixed income assets in the portfolio, at each duration, would be in accordance with the <u>insurer's</u> current investment policy.
- .07 The number of assumed terms of risk-free assets would be large enough to permit assumption of changes in the shape and steepness of the yield curve. That implies a minimum of a short, a medium, and a long term.
- .07.1 In all <u>scenarios</u> other than the base <u>scenario</u>, <u>credit spreads</u> include <u>margins for adverse</u> <u>deviations</u> as described in paragraph 2340.10.3. The <u>actuary</u> would also include an additional <u>provision for adverse deviations</u> by modifying the assumptions, if needed, on each fixed income asset purchased or sold on or after the 5th anniversary from the balance sheet date, such that
 - for assets purchased or sold on or after the 30th anniversary from the balance sheet date, the difference between the asset's <u>credit spread</u> and its asset depreciation assumption is not larger than a maximum promulgated from time to time by the Actuarial Standards Board, and
 - for assets purchased or sold between the 5th and 30th anniversary from the balance sheet date, the difference between the asset's <u>credit spread</u> and its asset depreciation assumption is not larger than using a uniform transition between the corresponding difference if purchased on the 5th anniversary from the balance sheet date and the promulgated maximum if purchased on the 30th anniversary from the balance sheet date.
- .08 A <u>scenario</u> for a foreign country's interest rates would be formulated independently of that for Canadian interest rates unless their positive historical correlation is expected to continue.

- .09 The importance of the assumptions for a particular forecast period depends on the magnitude of the net forecasted cash flow for that period.
- .09.01 The Actuarial Standards Board will promulgate from time to time the following ultimate risk-free reinvestment rates for use in the base scenario and the prescribed scenarios

short-term ultimate risk-free reinvestment rate-high, long-term ultimate risk-free reinvestment rate-high, short-term ultimate risk-free reinvestment rate-median, long-term ultimate risk-free reinvestment rate-median, short-term ultimate risk-free reinvestment rate-low, and long-term ultimate risk-free reinvestment rate-low.

- .09.02 Ultimate risk-free reinvestment rates at other terms would be determined in accordance with the historical relationship between rates at those terms and the short- and long-term rates. Ultimate risk-free reinvestment rate-low refers to low rates at all terms (including short-term ultimate risk-free reinvestment rate-low and long-term ultimate risk-free reinvestment rate-low), and similarly for ultimate risk-free reinvestment rate-median and ultimate risk-free reinvestment rate-high.
- .09.03 The parameters in the base and <u>prescribed scenarios</u>, including maximum net <u>credit spreads</u>, apply to investments denominated in Canadian dollars. For the base and each <u>prescribed scenario</u>, the <u>actuary</u> would determine the corresponding parameters for investments denominated in a foreign currency from the historical relationship between investments denominated in that currency and investments denominated in the Canadian dollar if the expected continuance of that relationship so permits. Otherwise the <u>actuary</u> would devise independent <u>scenarios</u> for investments denominated in that currency.

Base scenario

.09.1 In the base scenario,

risk-free interest rates effective after the balance sheet date would be equal to the forward interest rates implied by the equilibrium risk-free market curve at that date, for the first 20 years after the balance sheet date,

at and after the 60th anniversary from the balance sheet date, risk-free interest rates would be equal to the ultimate risk-free reinvestment rate-median, at the 40th anniversary from the balance sheet date, the risk-free interest rates would be equal to 30% of the rates at the 20th anniversary plus 70% of the rates

between the 20th and 40th and between the 40th and 60th anniversaries, the risk-free interest rates would be determined using a uniform transition, and

<u>credit spreads</u> at all durations would be the <u>best estimate</u> described in paragraph 2340.10.1.

.09.2 The <u>provision for adverse deviations</u> for interest rate risk for both deterministic and stochastic applications would be measured as the difference between the reported <u>insurance contract</u> <u>liabilities</u> and the <u>insurance contract liabilities</u> resulting from the application of the base <u>scenario</u>.

Prescribed scenarios

at the 60th anniversary,

- .10 Because future investment returns and inflation rates are so conjectural, it is desirable that the calculation of <u>insurance contract liabilities</u> for all <u>insurers</u> take account of certain common assumptions. There are, therefore, eight <u>prescribed scenarios</u> as presented below.
- .11 The <u>prescribed scenarios</u> apply to fixed income assets purchased or sold after the balance sheet date.
- .12 For a <u>prescribed scenario</u>, if the net cash flow forecast for a period is positive, then the <u>actuary</u> would assume its application to repay the outstanding balance, if any, of borrowing in accordance with paragraph 2330.14.
- .13 Repealed
- .14 For a <u>prescribed scenario</u>, if the net cash flow for a period is negative, then the <u>actuary</u> would assume an offsetting disinvestment or borrowing, or a mix of the two. For <u>insurer</u>-controlled investment decisions, any borrowing would be in accordance with the investment policy, would be short-term, and would be expected to be soon repayable by subsequent positive forecasted net cash flow.

- .15 Repealed
- .15.1 Repealed
- .15.2 Repealed
- .15.3 Repealed
- .16 Repealed
- .17 Repealed

Prescribed scenario 1

.18 The risk-free interest rates for investments purchased or sold

at the balance sheet date are those available in the market,

at the 40th anniversary from the balance sheet date and beyond, the risk-free interest rates are equal to ultimate risk-free reinvestment rate-low,

at the 1st anniversary from the balance sheet date, the risk-free interest rates are equal to 90% of the risk-free interest rates at the balance sheet date,

at the 20th anniversary of the balance sheet date, the risk-free interest rates are equal to 10% of the risk-free interest rates at the balance sheet date plus 90% of ultimate risk-free reinvestment rate-low, and

between each of the balance sheet date and the 1st, 20th, and 40th anniversaries, the risk-free interest rates are determined using a uniform transition.

Prescribed scenario 2

.19 This <u>scenario</u> is the same as <u>prescribed scenario</u> 1, with the ultimate risk-free reinvestment rate-low replaced by the ultimate risk-free reinvestment rate-high, and the 90% multiplier applicable on the 1st anniversary replaced by 110%.

Prescribed scenario 3

.19.1 The oscillation period for use in prescribed scenarios 3 to 6 is 20 years.

.20 The long-term risk-free interest rate moves cyclically between long-term ultimate risk-free reinvestment rate-low and long-term ultimate risk-free reinvestment rate-high as follows:

over the first quarter oscillation period, the long-term risk-free interest rate moves uniformly from the long-term interest rate at the balance sheet date to 75% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-low),

over the next quarter oscillation period, the long-term risk-free interest rate moves uniformly from 75% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-low) to long-term ultimate risk-free reinvestment rate-low,

over the next half oscillation period, the long-term risk-free interest rate moves uniformly from the long-term ultimate risk-free reinvestment rate-low to the long-term ultimate risk-free reinvestment rate high, and

this cycle is repeated for the remaining oscillation periods.

.21 The short-term risk-free interest rate moves as follows:

over the first quarter oscillation period, the short-term risk-free interest rate moves uniformly from the short-term interest rate at the balance sheet date to 50% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-low),

over the next quarter oscillation period, the short-term risk-free interest rate moves uniformly from 50% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-low) to 60% of the corresponding long-term interest rate, and

thereafter remains at 60% of the corresponding long-term interest rate.

.22 Other interest rates are determined using yield rates that are appropriate for the terms of those assets, in accordance with the historic relationship between the rates of those assets and the short- and long-term interest rates.

Prescribed scenario 4

- .23 This <u>scenario</u> is similar to <u>prescribed scenario</u> 3, but with the peaks of <u>prescribed scenario</u> 3 coinciding with the troughs of <u>prescribed scenario</u> 4. Over the first quarter oscillation period, the long-term risk-free interest rate moves uniformly from the long-term risk-free interest rate at the balance sheet date to 125% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-high). Over the next quarter oscillation period, the long-term risk-free interest rate moves uniformly from 125% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-high) to long-term ultimate risk-free reinvestment rate-high. Over the next half oscillation period, the long-term risk-free interest rate moves uniformly from the long-term ultimate risk-free reinvestment rate low, and this cycle is repeated for the remaining oscillation periods.
- .23.1 The short-term risk-free interest rate moves as follows:

over the first quarter oscillation period, the short-term risk-free interest rate moves uniformly from the short-term interest rate at the balance sheet date to 150% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-high),

over the next quarter oscillation period, the short-term risk-free interest rate moves uniformly from 150% of (80% of the risk-free interest rates at the balance sheet date plus 20% of ultimate risk-free reinvestment rate-high) to 60% of the corresponding long-term interest rate, and

thereafter remains at 60% of the corresponding long-term interest rate.

Prescribed scenario 5

This <u>scenario</u> is the same as <u>prescribed scenario</u> 3, except that the short-term risk-free interest rate at an anniversary of the balance sheet date is a percentage of the corresponding long-term risk-free interest rate. That percentage moves cyclically in 20% annual steps from 40% to 120% and back. The first cycle is irregular; over the first quarter oscillation period, the short-term risk-free interest rate moves uniformly from the short-term interest rate at the balance sheet date to 40% of the corresponding long-term interest rate. Thereafter the short-term risk-free interest rate moves cyclically in 20% annual steps from 40% to 120% and back.

Prescribed scenario 6

.25 As respects long-term risk-free interest rate, this <u>scenario</u> is the same as <u>prescribed scenario</u> 4.

.26 As respects short-term risk-free interest rate, this <u>scenario</u> is the same as <u>prescribed scenario</u> 5, except that, over the first quarter oscillation period, the short-term risk-free interest rate moves uniformly from the short-term interest rate at the balance sheet date to 120% of the corresponding long-term interest rate. Thereafter the short-term risk-free interest rate moves cyclically in 20% annual steps from 120% to 40% and back.

Prescribed scenario 7

.27 The risk-free interest rates for investments purchased or sold

at the balance sheet date are those available in the market,

at the 60th anniversary from the balance sheet date and beyond, are equal to 80% of the ultimate risk-free reinvestment rate-median,

at the 1st anniversary from the balance sheet date, are equal to 80% of the risk-free interest rates at the balance sheet date,

at the 20th anniversary from the balance sheet date, are equal to 80% of (30% of the risk-free interest rates at the balance sheet date plus 70% of ultimate risk-free reinvestment rate-median),

at the 40th anniversary from the balance sheet date, are equal to 80% of (10% of the risk-free interest rates at the balance sheet date plus 90% of ultimate risk-free reinvestment rate-median), and

between each of the balance sheet date and the 1st, 20th, 40th, and 60th anniversaries, are determined using a uniform transition.

Prescribed scenario 8

- .28 This scenario is the same as prescribed scenario 7, with the 80% replaced by 120%.
- .29 Repealed

Other scenarios

In addition to the <u>prescribed scenarios</u>, which would be common to the calculation of <u>insurance contract liabilities</u> for all <u>insurers</u>, the <u>actuary</u> would also select other <u>scenarios</u> that would be appropriate to the circumstances of the case. If current risk-free interest rates are near the limits or outside the range of ultimate risk-free reinvestment rate-low to ultimate risk-free reinvestment rate-high, then some <u>scenarios</u> would include rates that, in the near term, would be outside the range of ultimate risk-free reinvestment rate-low to ultimate risk-free reinvestment rate-high. The reasonableness of degrees of change of interest rates would be largely dependent on the period of time being considered. Other plausible <u>scenarios</u> would include parallel shifts up and down as well as flattening and steepening of the yield curve.

.31 The number of other interest rate <u>scenarios</u> would be relatively large to the extent that

the pattern of forecasted net cash flow in the base <u>scenario</u> is such that the classification of <u>scenarios</u> between favourable and unfavourable is unclear, forecasted net cash flow is sensitive to the selection of interest rate <u>scenarios</u>, the range of present values of forecasted net cash flow is wide, suggesting exposure to mismatch risk,

investment policy does not control mismatch risk, asset-liability management is loose, or flexibility to manage assets or liabilities is limited.

Stochastic interest rate scenarios

- .32 If the selection of interest rate <u>scenarios</u> is stochastic, the <u>actuary</u>'s calibration of stochastic models would meet the criteria for risk-free interest rates as promulgated from time to time by the Actuarial Standards Board.
- .33 The <u>actuary</u> would adopt a <u>scenario</u> whose <u>insurance contract liabilities</u> are higher than the mid-point of the range described in paragraph 2320.51 whenever current long-term risk-free interest rates are near the limits or outside the range of long-term ultimate risk-free reinvestment rate-low to long-term ultimate risk-free reinvestment rate-high or whenever any of the considerations in paragraph 2330.31 exist.

2340 Other Assumptions: Economic

Margin for adverse deviations

.00.1 Significant considerations indicating difficulties in properly estimating the <u>best estimate</u> assumption would include

there is little relevant experience,

future experience is difficult to estimate,

operational risks adversely affect the likelihood of obtaining the <u>best estimate</u> assumption,

asset underwriting criteria are weak or poorly controlled,

there are liquidity concerns,

there is uncertainty regarding the credit enhancement techniques used,

the trust structure and legal responsibilities of the different parties for a securitized asset are not clearly understood in a practical and/or legal sense,

the asset held is from a non-passthrough structure with a repackaging of the credit risk that is difficult to understand,

the asset held is from a lower-quality tranche from a structure that is not a passthrough structure that repackages credit risks,

there is uncertainty about the counterparty credit, or

there is no netting of the aggregate exposure with a counterparty.

.00.2 Other significant considerations indicative of a potential deterioration of the <u>best estimate</u> assumption would include

there is significant concentration of risks and/or lack of diversification, or

operational risks are present such that the likelihood of continuing to obtain the <u>best estimate</u> assumption is adversely impacted.

Fixed income assets: Investment return

.01 The forecast of cash flows from a fixed income asset would be the promised cash flows over the term of the asset, modified for asset depreciation and borrower and issuer options.

Fixed income assets: Asset depreciation

.02 The actuary's best estimate of asset depreciation would depend on

asset type, credit rating, liquidity, term, and duration since issue, subordination to other debt of borrower or issuer,

the <u>insurer's</u> credit underwriting standards, diversification within a particular type of investments, to the extent that it is indicative of the future, the <u>insurer's</u> own experience,

the insurance industry's experience,

guarantees that offset depreciation, such as that in an insured mortgage, and potential for <u>anti-selection</u> by borrowers and issuers.

- .03 Asset depreciation comprises that of both assets that are impaired at the balance sheet date and assets that become impaired after the balance sheet date, and includes loss of interest, loss of principal, and expense of managing default.
- .04 Asset depreciation is likely to be relatively high after the forced renewal of a mortgage loan; i.e., one where the mortgagor can neither pay, nor find an alternative mortgagee for the balance outstanding at the end of its term but is able to continue its amortization. The explicit forecasting of subsequent cash flow is usually so conjectural that to commute the cost of that asset depreciation to the end of the term of the mortgage would be an acceptable approximation unless it undermines the interest rate assumption in the scenario.
- .05 The <u>actuary</u> would not necessarily assume that the <u>best estimate</u> of asset depreciation is less than the asset's <u>credit spread</u>.
- .06 The low and high <u>margins for adverse deviations</u> for a <u>scenario</u> would be respectively 25% and 100% of the <u>best estimate</u> for that <u>scenario</u>, except that

a higher range would be appropriate where those percentages of an unusually low best estimate are not meaningful, and

zero would usually be appropriate for an Organisation for Economic Cooperation and Development (OECD) government's debt denominated in its own currency.

.07 Repealed

Fixed income assets: Exercise of borrower and issuer options

- .08 Examples of borrower and issuer options are the option to prepay a mortgage loan, to extend the term of a loan, and to call a bond.
- .09 The assumed exercise may depend on the interest rates in the <u>scenario</u>. <u>Anti-selection</u> by commercial borrowers and issuers would usually be intense.
- .10 Forecasted cash flows would include any penalty generated by exercise of an option.

Fixed income assets: credit spreads

.10.1 The best estimate of credit spreads

would be the <u>credit spreads</u> available in the market at the balance sheet date, at and after the 5th anniversary from the balance sheet date, would be based on long-term historical average <u>credit spreads</u> corresponding to assets by type, credit rating, and term, and

between the balance sheet date and the 5th anniversary, would be determined using a uniform transition.

.10.2 When choosing the <u>best estimate</u> of <u>credit spreads</u> based on long-term historical averages, the <u>actuary</u> would consider

using as long a period of history as practicable, and

adjusting the assumptions to reduce any inconsistencies that may arise from using different historical periods or sources of information for different asset types, credit ratings, or terms.

.10.3 The margin for adverse deviations in credit spreads would be

zero at the balance sheet date,

an addition or subtraction, as appropriate in aggregate, of 10% of the \underline{best} $\underline{estimate}$ assumptions at and after the 5th anniversary from the balance sheet date, and

between the balance sheet date and the 5th anniversary, the <u>margin for adverse</u> <u>deviations</u> as percentage of the <u>best estimate</u> would be determined using a uniform transition.

Non-fixed income assets: Investment return

- .11 Where reliable historical data are available the <u>best estimate</u> of investment return on a non-fixed income asset would not be more favourable than a benchmark based on historical performance of assets of its class and characteristics.
- .12 Repealed

- .13 Where the <u>best estimate for a class of non-fixed income assets</u> is based on reliable historical data, the <u>margin for adverse deviations</u> in the assumption of non-fixed income capital gains would be 20% of the <u>best estimate</u> plus an assumption that those assets change in value at the time when the change is most adverse. That time would be determined by testing, but usually would be the time when their book value is largest. The assumed change as a percentage of market value
 - of a diversified portfolio of North American common shares would be 30%, and of any other portfolio would be in the range of 20% to 50% depending on the volatility relative to a diversified portfolio of North American common shares.
- .13.01 Where the <u>best estimate</u> for a class of non-fixed income assets is based on reliable historical data, the low and high <u>margins for adverse deviations</u> in the assumptions of income on the class (for example; common share dividends and real estate rental income) would be respectively 5% and 20%. Furthermore, if the ratio of income (other than that fixed by agreement) to asset value increases following the assumed change in asset value described in paragraph 2340.13, the <u>margin for adverse deviations</u> in the assumption for income would be adjusted so the ratio five years after the assumed change in asset value is not higher than the ratio immediately before the assumed change in asset value.
- .13.1 Where reliable historical information is not available for a non-fixed income class of assets, the <u>actuary</u> would select a <u>best estimate</u> investment return assumption and <u>margins for adverse</u> <u>deviations</u> such that the assumed return in excess of risk-free interest rates, net of margins, would not exceed the assumed return in excess of risk-free interest rates, net of margins, for a similar asset class for which reliable historical information is available in the same jurisdiction, or in Canada if there is no relevant reliable historical information in the same jurisdiction.
- .14 Whether the assumed change is a gain or loss would depend on its effect on benefits to policy owners. A capital loss may reduce insurance contract liabilities as a result of that effect.

.14.1 If non-fixed income assets are used to support liability cash flows that are not substantially linked to returns on non-fixed income assets, the <u>actuary</u> would include an additional <u>provision for adverse deviations</u> by modifying the assumed investment strategy in the <u>scenario</u> adopted prior to considering this <u>provision for adverse deviations</u>, if needed, so that the amount of non-fixed income assets supporting such liability cash flows at the balance sheet date and at each duration in the projection does not exceed the amount required to support 20% of cash outflows for the first 20 years and 75% thereafter, where cash outflows are the greater of the annual liability cash flows and zero in each forecast period. This modification of the assumed investment strategy would be applied at each duration independently.

Non-fixed income assets: stochastic investment return scenarios

.14.2 If investment returns on non-fixed income assets are a <u>scenario</u>-tested assumption as described in paragraph 2320.52, the <u>actuary</u> would follow the guidance in subsection 2360 that is relevant to investment returns on non-fixed income assets.

Taxation

.15 The <u>best estimate</u> would be for continuation of the tax regime at the balance sheet date, except that the <u>best estimate</u> would anticipate a <u>definitive</u> or <u>virtually definitive</u> decision to change that regime. The <u>margin for adverse deviations</u> would be zero.

Foreign exchange

- .16 The needed assumptions would include foreign exchange rates when <u>insurance contract</u> <u>liabilities</u> and their supporting assets are denominated in different currencies.
- .17 The base <u>scenario</u> used to develop the assumption for foreign exchange rates would be based on currency forwards. If currency forwards are not available, the forward exchange rates would be derived based on risk-free interest rate differentials where available. If neither is available, the <u>actuary</u> would use his or her best judgment to develop an appropriate approach.
- .18 A <u>provision for adverse deviations</u> would be developed from a <u>scenario</u> using adverse movements in the exchange rate. Such movements would reflect the historical volatility in the exchange rate over the applicable period. The <u>provision for adverse deviations</u> would be the excess of the <u>insurance contract liabilities</u> based on this adverse <u>scenario</u> over the <u>insurance contract liabilities</u> calculated using the base <u>scenario</u>.
- .19 A minimum <u>provision for adverse deviations</u> would apply. This would be the excess of the <u>insurance contract liabilities</u> resulting from the application of an adverse five percent margin to the projected exchange rates underlying the base <u>scenario</u> over the <u>insurance contract</u> liabilities calculated using the base scenario.

2350 Other Assumptions: non-economic

Margin for adverse deviations

.01 The <u>actuary</u> would select a <u>margin for adverse deviations</u> between a low margin and a high margin

specified for each <u>best estimate</u> assumption discussed below, and of 5% and 20% (or –5% and –20%), respectively, of each other <u>best estimate</u> assumption.

- .02 If a <u>margin for adverse deviations</u> cannot be defined as a percentage of the <u>best estimate</u> assumption, then the related <u>provision for adverse deviations</u> would be taken as the increase in <u>insurance contract liabilities</u> that results from substitution of a conservative assumption for the <u>best estimate</u> assumption.
- .03 Significant considerations indicating difficulties in properly estimating the <u>best estimate</u> assumption would include

the <u>credibility</u> of the company's experience is too low to be the primary source of data,

future experience is difficult to estimate,

the cohort of risks lack homogeneity,

operational risks adversely impact the likelihood of obtaining <u>best estimate</u> assumption, or

the derivation of the best estimate assumption is unrefined.

.03.1 Other significant considerations indicative of a potential deterioration of the <u>best estimate</u> assumption would include

a significant concentration of risks and/or lack of diversification,

operational risks that adversely affect the likelihood of continuing experience which is consistent with the <u>best estimate</u> assumption, or

past experience that may not be representative of future experience and the experience may deteriorate.

Other significant considerations may exist, but are tied to specific assumptions. Where applicable, they are described below.

.04 A selection above the high margin would be appropriate, however, for unusually high uncertainty or if the resulting <u>provision for adverse deviations</u> is unreasonably low because the margin is expressed as a percentage and the <u>best estimate</u> is unusually low.

Insurance mortality

.05 The actuary's best estimate of insurance mortality would depend on

the life insured's age, sex, smoking habit, health, and lifestyle,

duration since issue of the policy,

plan of insurance and its benefits provided,

the <u>insurer's</u> underwriting practice (that of its reinsurer for facultative reinsurance), including, if applicable to the policy, the absence of underwriting or less stringent underwriting for a group of simultaneously sold policies,

the size of the policy, and

the insurer's distribution system and other marketing practice,

and would include the effect of any anti-selection.

- .05.1 The <u>actuary</u> would consider the inclusion of mortality improvement (a secular <u>trend</u> toward lower mortality rates) in the <u>best estimate</u> assumption and associated margin. The <u>margin for adverse deviations</u> related to the mortality improvement assumption is not restricted to the range of 5% to 20% noted in paragraph 2350.01.
- .06 If the inclusion of mortality improvement reduces the <u>insurance contract liabilities</u>, then the resulting reduction would be no greater than that developed using <u>prescribed</u> mortality improvement rates as promulgated from time to time by the Actuarial Standards Board. If, at an appropriate level of aggregation, the inclusion of mortality improvement increases the <u>insurance contract liabilities</u>, then the <u>actuary</u>'s assumption would include such improvement. The resulting increase in <u>insurance contract liabilities</u> would be at least as great as that developed using <u>prescribed</u> mortality improvement rates as promulgated from time to time by the Actuarial Standards Board.
- .07 The low and high <u>margins for adverse deviations</u> for the mortality rates per 1,000 would be respectively an addition or subtraction, as appropriate, of 3.75 and 15, each divided by the curtate expectation of life at the life insured's projected attained age. These <u>margins for adverse deviations</u> are applied after mortality improvement.
- .08 Repealed

Annuity mortality

- .09 The actuary's best estimate assumption of annuity mortality would depend on
 - the annuitant's age, sex, smoking habit, health, and lifestyle,
 - size of premium,
 - plan of annuity and its benefits provided, and
 - whether registered or not, whether structured settlement, and whether group or individual contract,
 - and would include the effect of any <u>anti-selection</u> resulting from the annuitant's option to select the timing, form, or amount of annuity payment, or to commute annuity payments.
- .10 The insurance underwriting in a "back-to-back" insurance/annuity package may unfavourably affect the <u>best estimate</u>.
- .11 The mortality improvement assumption would include a <u>best estimate</u> assumption and an associated margin. The <u>margin for adverse deviations</u> related to the mortality improvement assumption is not restricted to the range of 5% to 20% noted in paragraph 2350.01. The <u>actuary</u>'s assumption would include mortality improvement, the effect of which is to increase <u>insurance contract liabilities</u>, such that the resulting increase would be at least as great as that developed using <u>prescribed</u> mortality improvement rates as promulgated from time to time by the Actuarial Standards Board.
- .12 The low and high <u>margins for adverse deviations</u> for the mortality rates would be respectively a subtraction of 2% and 8% of the <u>best estimate</u>.
- .13 An additional significant consideration for the determination of the level of <u>margin for adverse</u> <u>deviations</u> would be the possibility of commuting survival dependent benefits after periodic payments have started.

Morbidity

.14 The actuary's best estimate of insurance morbidity would depend on

the life insured's age, sex, smoking habit, occupation, industry, health, and lifestyle,

duration since issue of the policy,

in the case of income replacement insurance, definition of disability, unemployment levels, and, in the case of an outstanding claim, cause of disability,

plan of insurance and its benefits provided, including elimination period, guarantees, deductibles, coinsurance, return-of-premium benefits, and benefit limits, indexation, and offsets,

the <u>insurer's</u> underwriting practice (that of its reinsurer for facultative reinsurance), including, if applicable to the policy, the absence of underwriting or less stringent underwriting for a group of simultaneously sold policies,

the insurer's administration and claim adjudication practice,

the size of the policy,

seasonal variations,

in the case of group insurance, participation level, and

environmental factors, such as a change in the offset to government benefits,

and would include the effect of any anti-selection.

- .15 If the <u>actuary</u> selects a higher than usual <u>best estimate</u> of disability incidence because of an outlook for a high level of unemployment, he or she would not necessarily select a concomitant higher than usual <u>best estimate</u> of disability termination.
- .16 Repealed
- .17 The low and high <u>margins for adverse deviations</u> would be, respectively, an addition of 5% and 20% of the <u>best estimate</u> of morbidity incidence rates, and a subtraction of 5% to 20% of the <u>best estimate</u> morbidity termination rates. The <u>actuary</u>'s selection would reflect any expected correlation between incidence and termination rates.

.18 Additional significant considerations to be taken into account when determining the level of margin for adverse deviations would include

the contract wording not tight enough to protect against medical advances,

definitions of claim events not precise and/or not protecting against potential anti-selection, or

interpretation of claim event definitions by the court uncertain.

Withdrawal and partial withdrawal

.19 The actuary's best estimate of withdrawal rates would depend on

policy plan and options,

the life insured's attained age,

duration since issue of the policy,

method of payment and frequency of premiums,

premium paying status,

policy size,

the policy's competitiveness, surrender charges, persistency bonuses, taxation upon withdrawal, and other incentives and disincentives to withdrawal,

policy owner and sales representative sophistication,

the <u>insurer's</u> distribution system and its commission, conversion, replacement, and other marketing practices, and

the interest rate scenario,

and would include the effect of any anti-selection.

.19.1 For the valuation of segregated fund guarantees, the <u>actuary</u>'s <u>best estimate</u> of withdrawal rates would also depend on

extent to which the guaranteed values are greater or less than the market value of the funds,

time to maturity,

systematic withdrawal consistent with the contractual terms of the policies,

market conditions, and

distribution of investment income from the funds if such amounts are not automatically reinvested.

- .20 The <u>insurer's</u> withdrawal experience would be pertinent and usually credible. It would not be available for new products and for higher durations on recent products, which is a problem for the <u>actuary</u> if the <u>insurance contract liabilities</u> are sensitive to withdrawal rates.
- .21 The automatic payment of insurance premiums by the annuity benefit in a "back-to-back" insurance/annuity package would be a disincentive to withdrawal.
- .22 Reinsurance assumed withdrawal rates would depend on practice in the direct insurer.
- A "cliff" is a sudden significant increase in the benefit available at withdrawal. That increase may result from increase in cash value, decrease in surrender charge, or availability of a maturity benefit or persistency bonus. Unless there is pertinent persistency experience data to the contrary, the <u>actuary</u>'s <u>best estimate</u> withdrawal rates would grade to zero as the cliff approaches and remain at zero for an interval before the cliff is reached. The same would apply to a return of premium benefit in life insurance and to one in accident and sickness insurance, with modification in the latter case if the benefit is contingent upon zero claims or reduced by the amount of claims.
- .24 The <u>actuary</u>'s <u>best estimate</u> withdrawal rate would be zero for a paid-up policy without non-forfeiture benefit.
- .25 The low and high <u>margins for adverse deviations</u> would be, respectively, an addition or subtraction, as appropriate, of 5% and 20% of the <u>best estimate</u> withdrawal rates. In order to ensure that the <u>margin for adverse deviations</u> increases <u>insurance contract liabilities</u>, the choice between addition and subtraction may need to vary by interest <u>scenario</u>, age, policy duration, and other parameters. In the case of partial withdrawal, two assumptions would be needed, the amount withdrawn and the partial withdrawal rate.
- .26 Additional significant considerations to be taken into account when determining the level of margin for adverse deviations in situations where a decrease in lapse rates increases the insurance contract liabilities would include

remuneration policy encouraging persistency, or

cancellation of a contract being clearly detrimental to the policy owner.

.26.1 Additional significant considerations to be taken into account when determining the level of margin for adverse deviations in situations where an increase in lapse rates increases the insurance contract liabilities would include

remuneration policy encourages terminations,

cancellation of a contract would be clearly beneficial to the policy owner,

company's contracts have provisions where rating decreases may trigger additional withdrawals, or

there is no market value adjustment on withdrawals for deposits and deferred annuities.

Anti-selective lapse

.27 Strictly speaking, "lapse" means termination of a policy with forfeiture, but in the context of anti-selection has come to include any termination or the election of the extended term insurance non-forfeiture option. "Anti-selective lapse" is a tendency of policies on healthy insured lives to lapse or unhealthy insured lives not to lapse, with a concomitant deterioration in the insurer's mortality or morbidity experience. To determine whether the tendency has operated in a particular case would require either a re-underwriting of those who have lapsed and those who have not, or a study of the mortality among those who lapsed, neither of which is likely to be practical. Policy owners will, however, make decisions in their own perceived interest, so that anti-selective lapse is plausible whenever that perceived interest is for policies on unhealthy lives not to lapse or for policies on healthy lives to lapse.

- .28 It is difficult to estimate with confidence the intensity of anti-selective lapse. It is plausible for the intensity to be proportional to the intensity of policy owner perceived interest. However, anti-selective lapse is merely a tendency provoked by the policy owner's perceived interest. The policy owner may not know the true state of health of the life insured. The policy owner may imprudently favour, or be obliged by financial pressure to adopt, a short-term interest with long-term detriment; thus, a policy on an unhealthy life may lapse when the premium increases, the policy owner perceiving the policy to be no longer affordable. Through ignorance or inertia, a policy on a healthy life may be continued by a policy owner, even though it could be replaced by a superior one. Moreover, anti-selective lapse is not the unvarying effect of a decision in the policy owner's perceived interest. For instance, a policy owner may lapse a policy on an unhealthy life, if the policy is no longer needed, or the policy on a healthy life may remain in force if the policy owner perceives a continuing need. Without pertinent and reliable experience, however, the actuary would not assume that the non-lapsation of policies on healthy lives favourably affects the mortality best estimate for the persisting insurance contracts.
- .29 The premise to the <u>actuary</u>'s assumptions would be that policy owners' decisions will tend to serve their perceived interest, and will not serve the <u>insurer's</u> interest unless the two run together.
- .30 Examples where the perceived interest of the policy owners of policies with healthy life insureds may be to lapse include

premium increase at renewal of term insurance,

unfavourable underwriting decision at renewal of re-entry term insurance,

benefit decrease or premium increase of adjustable insurance,

premium needed to avoid termination of universal life insurance with exhausted funding,

reduction in policy dividend scale,

offer or availability of a superior replacement policy, such as by the creation of preferred underwriting class,

significant but temporary increase (spike) in non-forfeiture value, and downgrade in the <u>insurer's</u> credit rating.

Expense

- .31 The <u>actuary</u> would select a <u>best estimate</u> assumption that provides for the expense of the relevant policies and their supporting assets, including overhead. The <u>insurer's</u> other expense is irrelevant to the valuation of <u>insurance contract liabilities</u>. Other expense would include
 - expense related to policies that, for the relevant policies, was incurred before the balance sheet date, such as marketing and other acquisition expense, and
 - expense not related to the relevant policies and their supporting assets, such as investment expense for the assets that support capital.
- .32 The assumption would provide for future expense inflation consistent with that in the interest rate <u>scenario</u>.
- .33 A stable <u>insurer's</u> expense experience is pertinent if its expense allocation is appropriate for valuation of <u>insurance contract liabilities</u> (or if the <u>actuary</u> can correct the inappropriateness, e.g., by reallocating corporate expense to operating lines of business).
- .34 A particular <u>insurer</u> may have an expectation of reduced expense rates, but the <u>actuary</u> would anticipate only a reduction that is forecasted with confidence.
- .35 Investment expense comprises
 - administration expense, both internal and external,
 - expense related to investment income, such as deferred fees and commissions and direct taxes, and
 - interest on money borrowed to finance investment.
- .36 The <u>insurer</u> incurs neither cash rental expense nor cash rental income on real estate that it owns and occupies. The <u>actuary</u> would deem such expense and, if the real estate supports the <u>insurance contract liabilities</u>, such income at a reasonable rate in the selection of an assumption of expense and investment return.
- .37 Certain taxes are akin to expenses. The <u>actuary</u> would make similar provision for them in the <u>insurance contract liabilities</u> to the extent that they relate to the relevant <u>insurance contracts</u> and their supporting assets. They include both premium taxes, which are straightforward, and taxes whose basis is neither income nor net income but which may be complicated by a relationship with income tax; for example, those currently incurred may be offset against later income tax.

- .38 The low and high <u>margins for adverse deviations</u> would be respectively 2.5% and 10% of <u>best</u> <u>estimate</u> expense including inflation thereof. No <u>margin for adverse deviations</u> is needed for a tax, such as premium tax, whose history has been stable.
- .39 Additional significant considerations to be taken into account when determining the level of margin for adverse deviations would include

distribution of general expenses by line of business, by product, or by issue and administrative expenses is not based on a recent internal expense study, allocation is not an appropriate basis for the best estimate expense assumption, expense study does not adequately reflect the appropriate expense drivers, or future reductions in unit expenses (before inflation) are assumed.

Policy owner options

- .40 Examples of policy owner options are options to
 - purchase additional insurance,
 convert term to permanent insurance,
 select the extended term insurance non-forfeiture option,
 make partial withdrawal from a universal life insurance policy,
 select the amount of premium for a flexible premium policy, and
 purchase an annuity at a guaranteed rate.
- .41 The <u>actuary</u> would select a <u>best estimate</u> assumption of policy owner exercise of both contractual options and extra-contractual options of which they have reasonable expectations.

.42 The actuary's best estimate would depend on

life insured's attained age,

duration since issue of the policy,

plan of insurance and its benefits provided,

historical premium payment patterns,

method of premium payment,

sophistication of the policy owner and the intermediary,

perceived self-interest of the policy owner and the intermediary,

policy's competitiveness, and

insurer's distribution system and other marketing practice,

and would make provision for anti-selection.

.43 The <u>actuary</u> would make <u>provision for adverse deviations</u> by testing the effect on <u>insurance</u> <u>contract liabilities</u> of plausible alternative assumptions of policy owner exercise of options and adopting one with relatively high <u>insurance contract liabilities</u>.

Maturities

.44 For valuation of segregated fund guarantees, the <u>actuary</u> would assume the contract terminates on maturity unless allowing a proportion of the policy owners to roll their contracts over would increase the <u>insurance contract liabilities</u>. The proportion of policy owners that elect to roll their policies over would take into account the experience of the <u>insurer</u>. The <u>actuary</u> would test future maturity dates that the policy owner may elect and would use caution in setting this maturity date assumption.

Management expense ratios and/or charges

.45 For valuation of segregated fund guarantees, the <u>actuary</u> would select a <u>best estimate</u> assumption for management expense ratios (including all taxes charged to the fund such as GST) that varies by fund according to the terms of the contract and recent practice of the <u>insurer</u>. The <u>actuary</u> would not assume a change in management expense ratios in the future unless there is a clear and justifiable reason for doing so, taking into account past practices, competitive pressures and reasonable policy owner reactions.

Fund transfers (switching/exchanges)

.46 For valuation of segregated fund guarantees, the <u>actuary</u> would test the effect of fund transfers and shifting asset mix and would exercise caution in assuming that the status quo would be maintained indefinitely.

Future optional deposits

.47 For valuation of segregated fund guarantees, the <u>actuary</u> would test the effect of future optional deposits to the extent they can reasonably be anticipated and use caution in assuming that the status quo would be maintained indefinitely.

Ratchet and reset rates

.48 For valuation of segregated fund guarantees, the <u>actuary</u>'s <u>best estimate</u> of rates at which ratchet and reset options are exercised by policy owners would depend on the

extent to which the guaranteed values are greater than the market value of the funds,

relationship of the fund value and guaranteed benefit amounts,

term to maturity, and

growth of funds.

.49 If resets are discretionary, the <u>actuary</u> would assume that some proportion of policy owners would elect to exercise the reset option when it is in their financial best interest to do so. The <u>actuary</u> need not assume that all policy owners would act with absolute efficiency in an economically rational manner. However, the assumptions would allow the frequency of elective resets to vary according to the current and/or historical economic environment.

Related Assumptions

.50 The <u>actuary</u> would consider how the assumptions may be interrelated in determining the <u>best</u>
<u>estimate</u> assumptions and appropriate margins. In determining these interrelationships the
<u>actuary</u> would take account of potential <u>anti-selection</u>. For example, the <u>actuary</u> would consider

the extent to which an increase in partial withdrawals on segregated funds might lead to deferrals in benefit commencement dates, and

what the relationships among term conversions, withdrawals and mortality might be as a contract nears the end of a term renewal period.

Other examples of how potential <u>anti-selection</u> might affect the selection of assumptions are provided above and in section 1700.

2360 Scenario Assumptions for Valuation of Segregated Fund Guarantees Model calibration

- .01 It is <u>prescribed</u> that the <u>actuary</u>'s calibration of stochastic models used in the valuation of segregated fund guarantees should meet the criteria for investment returns as promulgated from time to time by the Actuarial Standards Board. [Effective January 1, 2011]
- .02 Investment returns would be generated on a gross basis, before the application of any fees or consideration of specific product features. The objective would be to model the investment returns independently of any product features. However, care would be taken to assess whether total or price returns are required for the specific segregated funds being modelled.

Random number generators

- .03 The random numbers generated by computer algorithms are called pseudo-random because they are not truly random. Knowing the algorithm and the seed to the sequence is sufficient to predict the next random number that will be generated. A sound pseudo-random number generator provides a sequence that is statistically indistinguishable from a truly random sequence from the given distribution. The <u>actuary</u> would test the random number generator to demonstrate that it provides a sequence that is statistically indistinguishable from a truly random sequence for the given distribution.
- .04 It would be preferable for the results from stochastic modelling to be reproducible, so that a repeatable pseudo-random number generator would be available to an auditor.

Number of scenarios

- .05 The <u>actuary</u> would test that the number of <u>scenarios</u> <u>used</u> to calculate the <u>insurance contract</u> <u>liabilities</u> provides an acceptable level of precision that meets the standard of materiality. To increase the precision of the <u>insurance contract liability</u> calculation, it may be necessary to increase the number of <u>scenarios</u> significantly.
- .06 The <u>actuary</u> may consider <u>scenario</u> reduction techniques, such as stratified sampling, to reduce the number of scenarios on a sound statistical basis.

Modelling period

.07 The <u>actuary</u> would use a modelling period that is not longer than one month unless testing shows that the liability for segregated fund guarantees is not sensitive to the frequency of election of benefits or features.

Economic scenario generators

- .08 The <u>actuary</u> would develop stochastic models for each market index or proxy that is constructed for the segregated funds.
- .09 The <u>actuary</u> would select economic <u>scenario</u> generators for stochastic models that are robust and statistically sound.

Model parameter estimation

- .10 The <u>actuary</u> would estimate model parameters based on historical market data as opposed to recent market performance. Due to the long-term nature of the segregated fund guarantee, the historical data would cover a period at least twice as long as the projection period. However, when historical data are not available or appropriate for use, adjustments may be required.
- .11 The <u>actuary</u> would update model parameters regularly to reflect recent changes in market conditions.
- .12 When market data for foreign indices are used to estimate model parameters, the foreign exchange rate would be taken into account. The <u>actuary</u> may consider separate parameters for the market index and for the foreign exchange rate, for example, by including an explicit currency exchange model together with using local currency data to estimate the model parameters.
- .13 Parameters would take into account appropriate correlations among investment returns for all market indices and proxies that are constructed.

Selecting investment return assumptions for specific funds

.14 To develop investment returns for a specific fund, an appropriate proxy for the segregated fund would be constructed. The specific fund's investment policy, its asset allocation implied by the fund performance objective, its performance history, and its trading activities would be considered and reflected in the proxy asset composition. The proxy may take the form of a combination of recognized market indices or economic sector sub-indices or, less commonly, a well-defined set of trading rules in a specified asset universe. It would be appropriate for there to be a close relationship between the investment return proxy and the specific segregated funds.

Discount rates

.15 The <u>actuary</u> would select discount rates (or accumulation rates) to determine the asset balance necessary to support the liabilities using the assets allocated to support the segregated fund guarantees.

Base scenario

.16 The base <u>scenario</u> for calculating the <u>provision for adverse deviations</u> would be defined as the average of the <u>insurance contract liabilities</u> for all investment return <u>scenarios</u>.

2400 The appointed actuary

2410 Definitions

.01 In sections 2400 and 2500, "senior management" means

in the case of a Canadian <u>insurer</u>, both the chief executive officer and the chief financial officer, and,

in the case of a foreign <u>insurer</u>, both the chief agent for Canada and the person designated by the <u>insurer</u> as having responsibility for its Canadian operation.

.02 In this section 2400, "directors" means an <u>insurer's</u> board of directors and, in the case of a foreign <u>insurer</u>, includes the person whom they designate as responsible for the <u>insurer's</u> Canadian branch.

2420 Scope

- .00 Part 1000 applies to work within the scope of this section 2400.
- .01 This section 2400 applies to an appointed actuary who, pursuant to

the federal Insurance Companies Act, is the actuary of a company or society,

the federal Insurance Companies Act, is the <u>actuary</u> of the Canadian branch of a foreign company, or

a provincial Act, has the access to information, protection against civil liability, and duties in an <u>insurer</u>, that are substantially the same as those of the <u>appointed actuary</u> in the federal Act.

2430 Extension of scope

.01 This section 2400 does not apply to an <u>actuary</u> who is not an <u>appointed actuary</u> unless that <u>actuary</u> has the access to information and protection against civil liability equivalent to that which the federal Insurance Companies Act grants to an <u>appointed actuary</u>.

2440 Accepting and continuing an engagement

.01 Section 1400 applies rigorously to the engagement. [Effective January 1, 2003]

Qualifications, experience, and knowledge

- .02 As respects <u>Rule</u> 2 (Qualification Standards), the necessary qualifications, experience, and knowledge go beyond technical understanding and include the awareness that comes with maturity, communications with other <u>actuaries</u>, discussions at Institute meetings, and familiarity with conditions both internal and external to the <u>insurer</u>, and include communications skills.
- .03 An <u>actuary</u> accepting an engagement for the first time may wish to arrange professional, formal, and timely access to another <u>actuary</u> with experience as an <u>appointed actuary</u>.
- .04 It is important that the <u>insurer's</u> directors understand and accept the <u>actuary</u>'s role and its requirements for time, resources, and access to information. The <u>actuary</u> may wish written confirmation of the understanding and acceptance unless the role is part of the <u>insurer's</u> corporate culture.

Information needed

.05 The information necessary for the <u>work</u> consists of the records, accounts, documents, and oral briefings which provide an understanding of the <u>insurer's</u> operations, its obligations and the resources available to meet those obligations. That information includes

files of in force policies and outstanding claims, including their reinsurance, policy provisions and other communications with policy owners, past experience data, past financial data, communications with auditors and regulators, pricing practice, underwriting practice, claims settlement practice (including <u>case estimate</u> practice) and cost, asset-liability management practice, and capital management practice.

- .06 The process to identify and assure timely receipt of that information includes
 - an understanding of the insurer's decision making,
 - continual communication with members of management who can supply information, and
 - continual communication with the auditor in accordance with the CIA/CICA *Joint Policy Statement*.

2450 Report on matters requiring rectification

- .01 The <u>appointed actuary</u> should identify and monitor matters that may threaten the <u>insurer's financial condition</u>. The <u>appointed actuary</u> should investigate and then <u>report</u> any such matter which requires rectification to the senior management and, in the case of a Canadian <u>insurer</u>, send a copy of the <u>report</u> to the directors. The <u>report</u> may include recommendations for rectification and should specify a deadline for rectification that the <u>actuary</u> may later extend if appropriate. If there is no suitable rectification by that deadline or its extension, then the <u>appointed actuary</u> should <u>report</u> the matter to the <u>insurer's</u> regulator. [Effective January 1, 2003]
- .02 The sensitivity of <u>financial condition</u> to adverse conditions and events varies among <u>insurers</u>. For example, an increase in withdrawal rates among policies may be devastating in one life <u>insurer</u> and may be beneficial in another. <u>Financial condition</u> and hence, the magnitude of the conditions and events that may threaten it, also varies among <u>insurers</u>.
- .03 The frequency and intensity of the monitoring depend on the threatening conditions and events and on the circumstances of the <u>insurer</u>. A quarterly review would usually be a minimum.
- .04 There would be no such <u>report</u> to senior management of an adverse condition that does not threaten the <u>insurer's financial condition</u>. Informal notification and consultation would usually precede, and may obviate, that <u>report</u> to senior management.
- .05 That <u>report</u> would describe the threatening condition or event and the methods and assumptions in the <u>actuary</u>'s investigation of it. It is desirable that the <u>report</u> includes recommendations for its rectification.
- .06 The deadline would allow time, that is reasonable in the circumstances to arrange rectification.
- .07 The <u>report</u> to the regulator would describe the <u>actuary</u>'s investigation, the <u>report</u> to senior management, and senior management's response to that <u>report</u>. The <u>actuary</u> would advise the directors of the report to the regulator.

2460 Report to the directors

.01 The <u>appointed actuary</u> for a Canadian <u>insurer</u> should <u>report</u> at least yearly to the directors, or to their audit committee if the directors so delegate,

on the <u>insurer's financial position</u> and <u>financial condition</u>, and if required by law,

if the insurer has one or more participating accounts,

on the method of allocation of income and expenses to each such participating account,

on the management of the participating account(s), the dividend policy and dividend scales for the participating policy owners, and

if the <u>insurer</u> has adjustable policies in force, on the criteria established or amended by the directors for changes made by the company to the premium or charge for insurance, amount of insurance or surrender value in respect of its adjustable policies.

.02 The <u>appointed actuary</u> for a foreign <u>insurer</u> should <u>report</u> at least yearly to its chief agent for Canada on its <u>financial position</u> and <u>financial condition</u>. [Effective December 1, 2011]

Allocation of income

.03 The <u>report</u> on allocation of income and expenses among accounts would consider the fairness and equity of such allocation to participating policy owners.

Management of the participating account(s)

.03.1 The <u>report</u> on the management of the participating account(s) would consider the fairness to participating policy owners of the policy established by the directors respecting the management of the participating account(s).

Dividend policy and dividend scale

.04 The <u>report</u> on the dividend policy would consider the fairness of the policy to the participating policy owners. The <u>report</u> on the dividend scale would consider the conformity of the dividend scale to the dividend policy and its fairness to the participating policy owners.

Adjustments of adjustable policies

.05 The <u>report</u> on adjustable policies would consider the fairness of the criteria for changes to adjustable policies established or amended by the directors, the fairness to adjustable policy owners of the adjustments made and their conformity to those criteria.

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Fairness Opinions

.06 Where the applicable law requires that the <u>appointed actuary</u> opine on the fairness of the policies, criteria or methods established by the insurer with respect to any of

management of the participating accounts,

dividend policy,

dividends declared,

policy established respecting the criteria for making adjustments to adjustable policies and the adjustments made under this policy,

allocation of investment income to the participating accounts, and

allocation of expenses to the participating accounts,

the wording of an unqualified opinion would be as follows,

Management of participating accounts opinion

I have reviewed the policy established by the Board of Directors with respect to the management of the participating accounts of [the Company], [including amendments made during the most recent 12 months]. I conducted my review in accordance with accepted actuarial practice in Canada and pursuant to the guidance of the Superintendent of Financial Institutions.

In my opinion, the policy is fair to the participating policyholders.

Mary F. Roe Fellow, Canadian Institute of Actuaries [Place of issue of opinion]

[Date of opinion]

Dividend policy opinion

I have reviewed the policy established by the Board of Directors for determining the dividends [and bonuses or other benefits] of [the Company], [including amendments made during the most recent 12 months]. I conducted my review in accordance with accepted actuarial practice in Canada and pursuant to the guidance of the Superintendent of Financial Institutions.

In my opinion, the policy is fair to the participating policyholders.

Mary F. Roe
Fellow, Canadian Institute of Actuaries
[Place of issue of opinion]
[Date of opinion]

Dividend declaration opinion

I have reviewed the proposed dividends [and bonuses or other benefits], determined by the Board of Directors of [the company] with respect to policy years [ending between XX and YY], and have considered whether they have been determined in accordance with the policy established by the Board. I conducted my review in accordance with accepted actuarial practice in Canada and pursuant to the guidance of the Superintendent of Financial Institutions.

In my opinion, the proposed dividends [and bonuses or other benefits] are in accordance with the policy established by the Board and are fair to the participating policyholders.

Mary F. Roe
Fellow, Canadian Institute of Actuaries
[Place of issue of opinion]
[Date of opinion]

Adjustable policy changes opinion

I have reviewed the criteria established by the Board of Directors of [the company] with respect to any changes to be made to the premium or charge for insurance, amount of insurance or surrender value in respect of its adjustable policies [including amendments made during the most recent 12 months] and the changes made pursuant to those criteria. I conducted my review in accordance with accepted actuarial practice in Canada and pursuant to the guidance of the Superintendent of Financial Institutions.

In my opinion, the criteria are fair to the adjustable policyholders, and the changes made to the adjustable policies during the most recent 12 months are in accordance with those criteria and are fair to the adjustable policyholders.

Mary F. Roe Fellow, Canadian Institute of Actuaries [Place of issue of opinion] [Date of opinion]

Allocation of investment income to participating account(s) opinion

I have reviewed the method established by the Board of Directors for determining the portion of the investment income or losses of [the company] for the financial year ending [XX], including capital gains and losses, that is allocable to the participating account [each participating account] maintained by the company. I conducted my review in accordance with accepted actuarial practice in Canada and pursuant to the guidance of the Superintendent of Financial Institutions.

In my opinion, the method is fair and equitable to the participating policyholders.

Mary F. Roe
Fellow, Canadian Institute of Actuaries
[Place of issue of opinion]
[Date of opinion]

Allocation of expenses to participating account(s) opinion

I have reviewed the method established by the Board of Directors for determining the portion of the expenses, including taxes, of [the company] for the financial year ending [XX] that is allocable to the participating account [each participating account] maintained by the company. I conducted my review in accordance with accepted actuarial practice in Canada and pursuant to the guidance of the Superintendent of Financial Institutions.

In my opinion, the method is fair and equitable to the participating policyholders.

Mary F. Roe
Fellow, Canadian Institute of Actuaries
[Place of issue of opinion]
[Date of opinion]

.07 If the <u>appointed actuary</u> is unable to issue an unqualified opinion, the wording of the opinion would be adjusted to reflect the necessary qualification.

2470 Communication with the auditor

.01 Communication with the <u>insurer's</u> auditor would be desirable when the <u>actuary</u> makes a <u>report</u> to the <u>insurer's</u> senior management on a matter requiring rectification or makes an unfavourable <u>report</u> on the <u>insurer's financial condition</u>.

2480 Certification of Capital Filings as Required by the Regulator

- .01 This subsection 2480 applies to the <u>appointed actuary</u> of a life <u>insurer</u> when giving an opinion on the appropriateness of capital requirement calculations pursuant to law or on the appropriateness of internal models used to determine required capital for segregated fund guarantees pursuant to requirements of the regulator.
- .02 Such certifications should contain an opinion signed by the appointed actuary.

Appropriateness of capital requirement calculations

.03 The <u>appointed actuary</u> should prepare a <u>report</u> to support the opinion on the appropriateness of capital requirement calculations that outlines the areas where the calculation required discretion or significant technical calculations, and the methodologies and judgments that were applied. The <u>report</u> should be completed before the provision of a signed opinion pursuant to subsection 2480. [Effective February 7, 2013]

- .04 The opinion would be provided annually in support of the fiscal year-end regulatory capital filing on form(s) as directed by the regulator.
- .05 In providing such an opinion, the <u>actuary</u> would not be opining on whether the underlying factors or specified methods to be followed are appropriate but rather on the appropriateness of any interpretation and discretionary technical calculations and methods with respect to such guidelines.
- .06 Here is the standard opinion language [insert appropriate wording where indicated by square brackets].

"I have reviewed the calculation of the Minimum Continuing Capital and Surplus Requirement ratios of [company name] as at [date]. In my opinion, the calculations of the components of the required and available capital have been determined in accordance with the regulatory guidelines, and the components of the calculations requiring discretion were determined using methodologies and judgement appropriate to the circumstances of the company."

[Note: For Test of Adequacy of Assets in Canada form filings "Minimum Continuing Capital and Surplus Requirement ratios" and "required and available capital" are replaced by "test of adequacy ratio" and "required and available margin".]

[Note: For filings for provincially-regulated companies, the ratio definition, and definitions of required and available resources, should be amended to reflect the appropriate definitions in the provincial requirements.]

Appropriateness of internal models used to determine required capital for segregated fund guarantees

.07 The <u>appointed actuary</u> should prepare a <u>report</u> to support the opinion on the appropriateness of internal models used to determine required capital for segregated fund guarantees that outlines how the models comply with the related requirements of the regulator. The <u>report</u> should be completed before the provision of a signed opinion pursuant to subsection 2480. [Effective February 7, 2013]

- .08 The opinion would be provided annually in support of the fiscal year-end regulatory capital filing on form(s) as directed by the regulator. The opinion would also be provided to the regulator upon a new application to the regulator for permission to use such a model for required capital purposes and upon request of the regulator when making a modification to an existing model approved by the regulator.
- .09 In providing such an opinion, the <u>actuary</u> would not be opining on whether the underlying factors or specified methods to be followed are appropriate, but rather on the compliance with the requirements of the regulator.
- .10 Here is the standard opinion language [insert appropriate wording where indicated by square brackets].
 - "I have reviewed the internal model of [company name] for determining required capital for segregated fund guarantee risks as at [date] in the context of the requirements of [the regulator]. In my opinion, the [proposed] model is compliant in all material respects with the requirements of [the regulator] for an approved model used to determine required capital for segregated fund guarantee risks."

2500 Dynamic Capital Adequacy Testing

2510 Scope

- .00 Part 1000 applies to work within the scope of this section 2500.
- .01 This section 2500 applies to the <u>appointed actuary</u> of an <u>insurer</u> when preparing a <u>report</u> on the <u>insurer</u>'s <u>financial condition</u> pursuant to law.

2520 Investigation

- .01 The <u>appointed actuary</u> should make an investigation at least once during each financial year of the <u>insurer</u>'s recent and current <u>financial position</u>, and <u>financial condition</u>, as revealed by dynamic capital adequacy testing for selected <u>scenarios</u>.
- .02 The <u>appointed actuary</u> should make a <u>report</u> of each investigation in writing to the <u>insurer</u>'s board of directors (or to their audit committee if they so delegate) or its chief agent for Canada. The <u>report</u> should identify possible actions for dealing with any threats to satisfactory <u>financial</u> condition that the investigation reveals.
- .03 The <u>appointed actuary</u> should also make an interim investigation if there is a material adverse change in the <u>insurer</u>'s circumstances.
- .04 The <u>appointed actuary</u> should ensure that the investigation is current. The investigation should take into consideration recent events and recent financial operating results of the <u>insurer</u>.

 [Effective December 31, 2011]
- .05 The <u>actuary</u>'s investigations would be done with a frequency sufficient to support timely corrective actions by management and the board of directors or chief agent for Canada.

Recent and current financial position

.06 The investigation would review operations of recent years (normally at least three years) and the <u>financial position</u> at the end of each of those years.

Dynamic capital adequacy testing

.07 Dynamic capital adequacy testing examines the effect of selected plausible adverse <u>scenarios</u> on the <u>insurer</u>'s forecasted capital adequacy. It would be one of the <u>actuary</u>'s primary tools for investigation of an <u>insurer</u>'s <u>financial condition</u>.

- .08 The purpose of dynamic capital adequacy testing is to identify plausible threats to satisfactory <u>financial condition</u>, actions that would lessen the likelihood of those threats, and actions that would mitigate a threat if it materialized.
- .09 Dynamic capital adequacy testing is defensive, i.e., it addresses threats to <u>financial condition</u> rather than the exploitation of opportunity.

Satisfactory financial condition

.10 The <u>insurer</u>'s <u>financial condition</u> would be satisfactory if throughout the forecast period, under the base <u>scenario</u> and all plausible adverse <u>scenarios</u>, the statement value of the <u>insurer</u>'s assets is greater than the statement value of its liabilities, and under the base <u>scenario</u>, the <u>insurer</u> meets the supervisory target capital requirement.

Data, methods and assumptions

- .11 The <u>actuary</u> would start the forecast period <u>using</u> the data as of the most recent available fiscal year-end balance sheet date.
- .12 The methods and assumptions would reflect up-to-date studies and analysis available to the <u>actuary</u>.
- .13 The <u>policy liabilities</u> would be revalued at the end of the first financial year of the forecast period if a change in method or assumptions that is expected to be made by the <u>insurer</u> would result in a material change to the <u>financial position</u> of the <u>insurer</u>.
- .14 The <u>actuary</u> would consider recent events and recent operating results of the <u>insurer</u> up to the date of the <u>report</u>.
- .15 If an adverse event occurs between the date of the <u>report</u> and the date of its presentation to the <u>insurer</u>'s board of directors (or its chief agent for Canada), then the <u>actuary</u> would, at a minimum in the presentation to the <u>insurer</u>'s board of directors (or its chief agent for Canada), address the event and its potential implications on the results of the investigation. If appropriate, the <u>actuary</u> would redo the investigation.

Forecast period

2520.08

.16 The forecast period would begin at the most recent available fiscal year-end balance sheet date. The forecast period for a <u>scenario</u> would be sufficiently long to capture the effect of its adversity and the ability of management to react. The forecast period for a typical life <u>insurer</u> would not be less than five fiscal years. The forecast period for a typical property and casualty <u>insurer</u> would not be less than three fiscal years.

Scenarios

.17 The <u>scenarios</u> would consist of a base <u>scenario</u> and several plausible adverse <u>scenarios</u>. Each <u>scenario</u> takes into account not only in-force policies but also the policies assumed to be sold or acquired during the forecast period, and both insurance and non-insurance operations (for example, the operations of an <u>insurer</u>'s trust company subsidiary).

Base scenario

.18 The base <u>scenario</u> would be a realistic set of assumptions used to forecast the <u>insurer</u>'s <u>financial</u> <u>position</u> over the forecast period. Normally, the base <u>scenario</u> would be consistent with the <u>insurer</u>'s business plan. The <u>actuary</u> would accept the business plan's assumptions for use in the base <u>scenario</u> unless these assumptions are so inconsistent or unrealistic that the resulting <u>report</u> would be misleading. The <u>actuary</u> would <u>report</u> any material inconsistency between the base <u>scenario</u> and the business plan.

Plausible adverse scenarios

- .19 A plausible adverse <u>scenario</u> would be a <u>scenario</u> of adverse, but plausible, assumptions about matters to which the <u>insurer</u>'s <u>financial condition</u> is sensitive. Plausible adverse <u>scenarios</u> vary among <u>insurers</u> and may vary over time for a particular <u>insurer</u>.
- .20 The <u>actuary</u> would consider material, plausible risks or events to the <u>insurer</u>. Reverse stress testing can help assess whether certain risk factors need to be tested, on the grounds that certain risk factors could never deteriorate to the point where it would be a threat to the <u>insurer</u>'s <u>financial condition</u>. The <u>actuary</u> can thereby determine whether a material, plausible risk or event exists for the <u>insurer</u> over the forecast period.

Risk categories

.21 For life <u>insurers</u>, the <u>actuary</u> would consider threats to capital adequacy under plausible adverse <u>scenarios</u> that include, but are not limited to, the risk categories

```
mortality,
morbidity,
persistency and lapse,
cash flow mismatch (C-3 risk),
deterioration of asset values (C-1 risk),
new business,
expenses,
reinsurance,
government and political issues,
counterparty,
off-balance-sheet items, and
related companies.
```

.22 For property and casualty <u>insurers</u>, the <u>actuary</u> would consider threats to capital adequacy under plausible adverse <u>scenarios</u> that include, but are not limited to, the risk categories

```
claim frequency and severity,

policy liabilities,
inflation,
premium,
reinsurance,
investment,
government and political issues,
off-balance-sheet items, and
related companies.
```

Integrated scenarios

.23 In many cases, plausible adverse <u>scenarios</u> would be associated with a low probability of occurrence. In such cases, it would usually not be necessary for the <u>actuary</u> to construct integrated <u>scenarios</u> by combining two or more low-probability adverse <u>scenarios</u>.

- .24 In some cases, however, the probability associated with a plausible adverse <u>scenario</u> may be close to the probability associated with the base <u>scenario</u>. For example, a significant asset on the balance sheet may be showing early signs of distress. In such cases, an integrated <u>scenario</u> would be constructed by combining each more probable adverse <u>scenario</u> with a low-probability adverse <u>scenario</u>. The low-probability adverse <u>scenario</u> selected would be the one that has the greatest effect on the <u>insurer</u>'s <u>financial condition</u> and is plausible when combined with the more probable adverse <u>scenario</u>.
- .25 An integrated <u>scenario</u> would be included in the minimum of three plausible adverse <u>scenarios</u> required by paragraph 2520.33 if the integrated <u>scenario</u> was found to be one of the three most adverse <u>scenarios</u>.

Ripple effects

- .26 In assuring consistency within each <u>scenario</u>, the <u>actuary</u> would consider ripple effects. Although most of the other assumptions used in the base <u>scenario</u> may remain appropriate under the plausible adverse <u>scenario</u>, some may require adjustment to reflect the interdependence of assumptions in the plausible adverse <u>scenario</u>.
- .27 Ripple effects would include both policy owner action and the <u>insurer</u>'s expected response to adversity. Selection of the assumptions for the <u>insurer</u>'s response would, where appropriate, take into account
 - effectiveness of the <u>insurer</u>'s management information systems and adjustment mechanisms,
 - <u>insurer</u>'s historical record of promptness and willingness, when faced with adversity, to make difficult decisions, and
 - external environment assumed in the scenario.
- .28 The <u>actuary</u> would <u>report</u> the expected response, so that <u>users</u> may consider its practicality and adequacy. The <u>actuary</u> may also <u>report</u> the results assuming that the <u>insurer</u> does not respond to the adversity.
- .29 Ripple effects also include regulatory action, especially under any plausible adverse <u>scenario</u> where the <u>insurer</u> fails to meet the supervisory target capital requirement. The <u>actuary</u> would consider action that could be taken by the Canadian regulator(s) as well as action taken by regulators in foreign jurisdictions. Such regulatory action and associated management response would consider the local assessment of solvency regardless of the <u>insurer</u>'s worldwide solvency position as measured by Canadian regulatory standards.

Corrective management actions

.30 For each of the plausible adverse <u>scenarios</u> that would result in a threat to satisfactory <u>financial</u> <u>condition</u>, the <u>actuary</u> would identify possible corrective management actions that would lessen the likelihood of that threat, or that would mitigate that threat, if it materialized. These actions could include but are not limited to

repricing the insurance products,

suspending dividend payments, capital reductions and transfers to the parent or home office, where applicable,

raising additional capital or adopting an approved plan to raise additional capital if and when needed within a reasonable timeframe, or, in the case of a branch, requesting transfer of adequate funds from the parent company,

strengthening risk management practices,

mitigating the risk causing the capital shortfall, and

an increased level of monitoring and <u>reporting</u> with respect to the <u>insurer</u>'s capital position.

.31 Consideration would also be given to the effectiveness of planned management actions in a volatile or stressed environment.

Scope of the investigation and report

- .32 The <u>report</u> would contain the key assumptions of the base <u>scenario</u> and the plausible adverse <u>scenarios</u> posing the greatest risk to the satisfactory <u>financial condition</u> of the <u>insurer</u>.
- .33 The <u>report</u> would disclose each of the risk categories considered in undertaking the dynamic capital adequacy testing analysis, including those identified in these Standards of Practice. It is expected that the <u>actuary</u> would <u>scenario</u> test and <u>report</u> at least once during each financial year on the base <u>scenario</u>, and a minimum of three plausible adverse <u>scenarios</u> posing the greatest risk for the <u>insurer</u>. Fewer than three plausible adverse <u>scenarios</u> may be <u>reported</u> only in the rare event that it is not possible to develop such <u>scenarios</u>.
- .34 The <u>report</u> would also contain the plausible adverse <u>scenarios</u> examined that cause the <u>insurer</u> to fall below the supervisory target capital requirement. The <u>report</u> would make it clear that under these <u>scenarios</u> the regulators may impose restrictions on the operations of the <u>insurer</u>, including its ability to write new business.

- .35 If the investigation identifies any plausible threat to satisfactory <u>financial condition</u>, then the <u>actuary</u> would identify possible corrective management action that would lessen the likelihood of that threat, or that would mitigate that threat, if it materialized. For each such adverse <u>scenario reported</u> upon, the <u>actuary</u> would <u>report</u> the results both with and without the effect of corrective management action. The <u>actuary</u> would <u>report</u> the corrective management action so that <u>users</u> may consider its practicality and adequacy.
- .36 The <u>report</u> would present the <u>financial position</u> of the <u>insurer</u> at each fiscal year-end throughout the forecast period.

Revaluation of the policy liabilities

.37 Ideally, for the base and each plausible adverse <u>scenario</u>, the <u>insurance contract liabilities</u> and, if applicable, other <u>policy liabilities</u> or <u>reinsurance recoverables</u>, would be revalued throughout the forecast period. But their revaluation only at the end of the forecast period may be a suitable compromise, unless the <u>actuary</u> believes, given the <u>financial position</u> at the end of the forecast period, that the <u>financial condition</u> would not be satisfactory at some point during the forecast period if revaluation were performed at that point.

Interim investigation

investigation may be so far-reaching that to delay <u>reporting</u> to the time of the next scheduled investigation would be imprudent. For example, failure to meet the supervisory target capital requirement, or adoption of a radically different business plan, may make an immediate <u>report</u> urgent. In such a case, the <u>actuary</u> would undertake and <u>report</u> on an interim investigation.

2530 Reporting

- .01 In the case of a Canadian <u>insurer</u>, the <u>appointed actuary</u> should <u>report</u> to the board of directors or to their audit committee if they so delegate. In the case of a Canadian branch of a foreign <u>insurer</u>, the <u>appointed actuary</u> should <u>report</u> to the chief agent for Canada and may also <u>report</u> to the responsible senior executive in the parent head office. [Effective December 31, 2011]
- .02 In order to give the <u>insurer</u>'s senior management an opportunity to react to the results of the investigation, the <u>actuary</u> would discuss the <u>report</u> with the <u>insurer</u>'s senior management in advance of its submission to the board of directors or chief agent for Canada.

- .03 The <u>report</u> would be in writing, but an additional oral <u>report</u> that permits questions and discussions is desirable. An interpretative <u>report</u> would be more useful than a statistical <u>report</u>.
- .04 The timing of the <u>report</u> would depend on the urgency of the matters being <u>reported</u> and on the desirability of integrating dynamic capital adequacy testing into the <u>insurer</u>'s financial planning cycle. The <u>report</u> would be submitted within 12 months following each fiscal year-end.

2540 Opinion by the Actuary

- .01 The <u>report</u> should contain an opinion signed by the <u>appointed actuary</u>. [Effective December 31, 2011]
- .02 In this opinion, "future <u>financial condition</u>" has the same meaning as "<u>financial condition</u>." The <u>actuary</u> may use the words "future <u>financial condition</u>" in order to comply with legislation or regulation in some jurisdictions.
- .03 The wording of the opinion follows: [insert appropriate wording where indicated by square brackets]

"I have completed my investigation of the [future] financial condition of [insurer name] as at [date] in accordance with accepted actuarial practice in Canada.

I have analyzed the forecasted financial positions of the insurer during the [number] year forecast period under a series of scenarios. A description of these scenarios and their impact on the insurer is included within this report.

The most significant assumptions are described within this report. The investigation incorporates assumptions relating to business growth, investments, [mortality, morbidity, claims frequency, capital injections, other policy-related experience] and other internal and external conditions during the forecast period.

My report includes the identification of key risk exposures [and corrective management actions that could be taken to mitigate the effect of plausible adverse scenarios].

In my opinion, the [future] financial condition of the insurer [is satisfactory or is not satisfactory for the following reason(s)...]"

[Montréal, Québec]
[Report date] Fellow, Canadi

[Mary F. Roe] Fellow, Canadian Institute of Actuaries

2600 Ratemaking: Property and casualty insurance

2610 Scope

- .00 Part 1000 applies to work within the scope of this section 2500.
- .01 This section 2600 applies to the derivation of <u>indicated rates</u> for an <u>insurance contract</u> of <u>property and casualty insurance</u> written by an <u>insurer</u>, a reciprocal insurance exchange or an underwriting syndicate.
- .02 This section 2600 does not apply to the derivation of <u>indicated rates</u> for <u>public personal</u> <u>injury compensation plans</u> covered by the Practice-Specific Standards for Public Personal Injury Compensation Plans.
- .03 This section 2600 applies to the derivation of <u>indicated rates</u> for any entity, such as a residual market mechanism or an advisory organization, which derives <u>indicated rates</u> for an <u>insurance contract</u> to be written by an <u>insurer</u>, regardless of whether or not that entity is itself an <u>insurer</u>.
- .04 This section 2600 applies to the derivation of <u>indicated rates</u>, but not to the recommendation or selection of rates to be charged. The recommended or selected rates may reflect considerations beyond those set forth in this section 2600.
- .05 This section 2600 also applies to the derivation of <u>indicated rates</u> for insurance risks accepted by a property and casualty quasi-<u>insurer</u>, similar to insurance risks accepted under an <u>insurance contract</u>. In this section 2600, "property and casualty quasi-<u>insurer</u>" means an entity that assumes insurance risks that a property and casualty <u>insurer</u> may assume, without having the legal form of an <u>insurer</u>. Examples of property and casualty quasi-insurers include

federal or provincial crown corporations or agencies acting in a capacity similar to a property and casualty <u>insurer</u>,

providers of extended warranties, and

self-funding mechanisms, such as those created by members of a professional association, or entities that retain some or all of their <u>property and casualty insurance</u> risk.

2620 Method

- .01 The <u>best estimate</u> present value of cash flows relating to the revenue at the <u>indicated rate</u> should equal the <u>best estimate</u> present value of cash flows relating to the corresponding claim costs and expense costs, plus the present value of a provision for profit, over a specified period of time.
- .02 The <u>actuary</u> should select appropriate methods, techniques and assumptions recognizing that such elements depend on the circumstances of the case and that a variety of actuarial methods may be appropriate to derive an indicated rate. [Effective January 1, 2012]

Data

.03 The <u>actuary</u> would consider the availability and relevance of <u>subject experience</u> and <u>related</u> experience.

Credibility

.04 The <u>actuary</u> would consider the blending of information from <u>subject experience</u> with information from one or more sets of <u>related experience</u> to improve the predictive value of estimates.

Changes in circumstances

.05 The <u>actuary</u> would consider that the <u>subject experience</u>, <u>related experience</u> and future cash flows may be affected by changes in circumstances that may affect expected claim costs, expense costs, and provision for profit.

.06 Relevant circumstances subject to change may include items that are largely under the control of the entity providing insurance, such as

underwriting practice,

distribution system,

claims handling and case estimate setting practice,

reinsurance arrangements,

data processing and accounting systems,

distribution or type of business written,

provisions of the insurance contract(s), when not legislated,

premium rates, and

rating variables,

as well as items that are largely not under the control of the entity providing insurance, such as

legislated coverage or benefits, and

the economic, social and legal environments.

Development

.07 The <u>actuary</u> would consider that <u>subject experience</u> and <u>related experience</u> may be subject to <u>development</u> over time.

Trend

.08 The <u>actuary</u> would consider that <u>subject experience</u> and <u>related experience</u> may be subject to trend over time.

Unusual events

.09 The <u>actuary</u> would consider that <u>subject experience</u> and <u>related experience</u> may or may not have been subject to catastrophes, large losses or other unusual events.

Provision for Expense Costs

.10 The <u>actuary</u> would determine the provision for expense costs that is appropriate for the period during which the rates are expected to be in effect.

.11 In selecting a provision for expense costs, the actuary would consider

the various categories of expense costs that are incurred including, as may be applicable, residual market assessments, statutory assessments, <u>policyholder</u> dividends, and reinsurance costs,

that expense costs may not be directly proportional to premium, and

that one-time expense costs may need to be amortized.

.12 The provision for expense costs, or other assumptions that are pertinent to its derivation, may be specified to the actuary under the terms of an appropriate engagement.

Provision for Profit

- .13 An indicated rate would include a provision for profit.
- .14 The provision for profit, or other assumptions that are pertinent to its derivation, may be specified to the actuary under the terms of an appropriate engagement.

Time Value of Money

- .15 The investment return rate for calculating the present value of cash flows would reflect the expected investment income to be earned on assets that might be acquired with the net cash flows resulting from the revenue at the <u>indicated rate</u>.
- .16 Among various possible sets of such assets the actuary would consider
 - default-free assets of appropriate duration,
 - fixed income assets of appropriate duration, and
 - assets which are expected to be acquired.
- .17 The <u>actuary</u> would consider the fact that the provision for profit is not independent of the selected investment return rate and its associated uncertainty.

2630 Reporting

.01 If an <u>external user report</u> is required and the <u>actuary</u> can <u>report</u> without reservation, the <u>actuary</u>'s <u>report</u> should include the <u>standard reporting language</u> consisting of the following scope paragraph,

I have derived the indicated rate(s) in accordance with accepted actuarial practice in Canada, on behalf of [entity commissioning the work], for the following insurance category(ies): [name of insurance category(ies)], to be effective Month XX, 20XX for new business and Month XX, 20XX for renewal business.

- .02 If an <u>external user report</u> is required and the <u>actuary</u> cannot <u>report</u> without reservation, the <u>actuary</u> should modify the <u>standard reporting language</u> accordingly. [Effective January 1, 2012]
- .03 An additional opinion paragraph may be included to conform to the requirements of an external user.

2700 Policyholder Dividend Determination

2710 Scope

- .00 Part 1000 applies to work within the scope of this section 2700.
- .01 Section 2700 applies to advice provided on <u>policyholder</u> dividend determination on individual life, annuity and health policies.

2720 Report on policyholder dividends

- .01 There should be a written <u>report</u> which documents the advice on <u>policyholder</u> dividend determination, and which describes the framework of facts, assumptions and procedures upon which the advice was based.
- .02 The report should include:
 - a description of the process used to determine dividends;
 - the manner in which policy and experience characteristics are reflected in that process; and
 - the methodology used to calculate dividends, including specific factors used to reflect policy and experience characteristics.
- .03 The <u>report</u> should state whether or not the <u>contribution principle</u> has been followed, and, if it has not been followed, the <u>report</u> should describe any deviations and their rationale. [Effective January 1, 2014]