

# Professionalism Potpourri

**Aquil Ahmed, ASA, EA, MAAA, FCA**

**President - Actuarial Retirement Services, LLC.**

**Thomas Le,**

**Director, PricewaterhouseCoopers**

**October 3, 2011**

# Agenda

2

- Record Retention
- Code of Professional Conduct/ASOPs
- Actuarial Communications/Email issues
- Ethics/conflict of interest
- Data Privacy and Security
- Peer Review
- Q&A

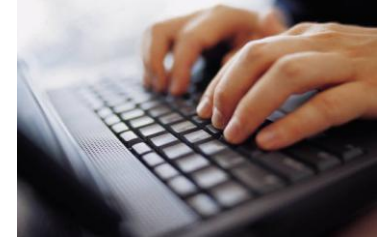
# Records Retention

# Overview

4

- Records management, including creation, retention, and destruction, is a business imperative in today's world
- Regulators, business leaders and clients depend on and hold companies and individuals accountable for adequate record keeping
- Ignorance of the requirements is not a defense
- In light of this, companies and individual consultants should be aware of the requirements and expectations and be prepared

# What is a Record?



- Evidence of a decision or action taken in the course of business
- Can take almost any form—e-mails, instant messages, text files, voice mails, paper, invoices, employee records, a website, a collaborative team space, reports, and even maps, rocks, or other physical samples
- The total collection of corporate records constitutes the organization's memory

*Source: AIIM E-Doc Magazine, November/December 2007*

# Examples of Non-records...



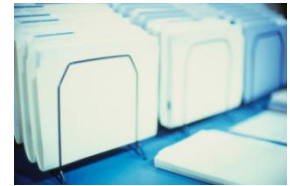
6

- ❑ A draft that does not document significant changes in calculations, wording or advice
- ❑ Does not document a business transaction or communicate a final decision
- ❑ Does not provide historical information that could be used to recreate an outcome
- ❑ An inter-team administrative document with no ongoing value
- ❑ Trivial e-mail correspondence
- ❑ Newsletters, articles, or reference materials with no value beyond project close
- ❑ Personal e-mail and documents

# Paper and electronic records

## Paper Records

- Paper records can provide an important transition to electronic records management
- Some business processes and records cannot be preserved solely by electronic means



## Electronic Records

- Electronic records present special challenges and must adhere to certain regulations that govern the type, access and format of electronic records



# E-mail



- E-mail has become our primary form of business communication
  - ▣ Presents new record management challenges
  - ▣ Can help or hurt our record retention efforts
  - ▣ Extremely important to address explicitly
- E-mails contain critical business information and are easily copied
- Many employees assume that saving personal copies of e-mail is acceptable
- Others may lack discretion in terms of the content included in e-mail
- As a rule, e-mails should be preserved electronically in a single repository



# E-mail



- During litigation, opposing counsel often uncovers damaging information in e-mails
- This may be due to the common, but inaccurate, perception that once deleted, email is gone forever.
- It may also be because people are much more casual in their use of email than they are when writing a letter or memorandum.

# Why do you need a records management program?

10

- Professionals are bound to comply with laws, regulations and professional standards for record retention
- Clients expect us to properly document our work, and to manage and protect their data, work products, and deliverables
- In case of lawsuit, an effective records management program facilitates legal discovery for you and your clients
- Adequate and proper records management can protect your clients, your employees, and your firm's revenue and reputation

# Document retention policies are essential in ensuring legal compliance and business efficiency

11

A good document retention system can solve a wide range of problems:

- Time-consuming document searches
- Quality improvements
- Records security issues
- Storage space costs
- Regulatory compliance

# An adequate records management program...

12

- Establishes, documents and ensures compliance with a records management policy
- Is able to produce required records when requested by the client or legal counsel
- Provides employees with adequate guidance and official repositories to maintain copies of records, including e-mails and paper copies
- Disposes of records after the retention period expires

# Can your company afford to ignore this critical business issue?

## **Philip Morris**

Deleted e-mails after court's preservation order

**Sanctioned \$2.75 million**

## **Bank of America**

Failure to produce documents to SEC

**Fined \$10 million**

## **URB Warburg**

Destroyed e-mails

**\$29 million verdict**

## **Morgan Stanley**

Inability to produce e-mail

**Fined \$15 million**

## **Arthur Andersen**

Inadequate records management practices

**Corporate Failure**

# Can your company afford to ignore this critical business issue?

- Victor Stanley, Inc. v Creative Pipe, Inc. (2010) - Judge ordered jail time (unless and until awarded attorneys' fees and costs are paid) for repeated, intentional destruction of thousands of electronic documents. Sanctions for spoliation and violations of electronic document preservation
- Pension Committee of the University of Montreal Pension Plan v Bank of America Securities (2010) - Gross negligence in failing to preserve electronic documents
- Rimkus Consulting Group, Inc. v Cammarata (2010) - Willful destruction of relevant data
- Grange Mutual Casualty Co. v Mack (2008) - \$8.83 million in sanctions. A pattern of abuse and obstruction described by the court concerning paper documents also occurred in electronic discovery, where the obstruction prevented the other party from accessing evidence needed to bring the case.
- Qualcomm, Inc. v Broadcom Corp. (2008) - \$8.5 million in sanctions. Massive discovery failure: the court held that Qualcomm had withheld "tens of thousands of emails"
- Southern New England Telephone Co. v. Global NAPs, Inc. (2008) - - \$5.89 million in sanctions. Failure to comply with discovery orders

# Characteristics of an effective records management program

- Clearly defines requirements
- Complies with laws and regulatory authorities and professional standards
  - ▣ Focuses on risk reduction
  - ▣ Facilitates discovery in cases of litigation
- Builds a supporting infrastructure and compliance mechanism that includes both paper and electronic records
  - ▣ Eliminates need to rely on system backups that are designed for disaster recovery
  - ▣ Takes into account all types of records—including e-mail
  - ▣ Creates an easy-to-use electronic management system that facilitates adherence to the policy



# Records Management For Actuaries



**Risk**



**Client  
Expectations**



# U.S. DOL's Definition of Acceptable Electronic Media

- Electronic record management (ERM) system has reasonable controls to ensure the integrity, accuracy, authenticity and reliability of the electronic records.
- Electronic records are maintained in a reasonable order and in a safe and accessible place.
- The system provides for indexing, preserving, retrieving and reproducing the electronic records.
- Records must be convertible into legible paper copy.
- System doesn't interfere with a company's ability to comply with ERISA reporting and disclosure requirements.
- Adequate record(s) management practices are implemented.
- Records exhibit a high degree of legibility when viewed electronically.

# Actuarial Standards Board

18

- Records—Communications that are always records
  - Actuarial Communication—A written, electronic, or oral communication issued by an actuary with respect to actuarial services.
  - Actuarial Findings—The result (including advice, recommendations, opinions, or commentary on another actuary's work) of actuarial services.
  - Actuarial Report—The set of actuarial documents that the actuary determines to be relevant to actuarial findings that is available to an intended user.

*Source: Actuarial Standards Board, Actuarial Standard of Practice No. 41, December 2010*

- Records or non-records—Actuary makes determination
  - Transcripts or summaries of an oral communication of actuarial findings
  - Internal communications, for example within a company, organization, firm or government agency
  - Communications, during the course of an assignment, among those providing actuarial services

## Applicability of ASOP 23

- *ASOP 23---“For purposes of data quality, data obtained from inventory or sampling methods are comprehensive if they contain sufficient data elements or records needed for the analysis.”*
- *ASOP 23—“Review of Prior Data—If similar work has been previously performed for the same or recent periods, the actuary should consider reviewing current data for consistency with the data used in prior analysis”*

# Applicability of ASOPS 36 and 41

- ASOP 36 – Retention of old documents may help other actuaries to review prior opinion
- ASOP 41 – An actuary may choose to keep file material other than that which is to be disclosed under this ASOP.

# Consideration for insurance industry

- Consistency----Electronic Vs Paper
- Managing retention period effectively
- Educating employees
- Minimizing E&O exposure/legal issues
- Catastrophe planning

# Document retention policy

- The actuaries should maintain sufficiently detailed work papers such that another qualified actuary could evaluate their reasonableness
- Actuaries should consider what documents to keep and what to discard
- A qualified attorney can help to develop a document retention policy
- Once the policy is in place, consistent compliance can reduce risk

## Record(s) categories and types ...

- Promote consistency in the way associates file client records and non-records (paper or electronic)
- Can effectively merge electronic content management (front-end user) with records management (back-end system administrator)
- Allow the seamless application of retention schedules
  - ▣ Record category—Broad classification for records
  - ▣ Record type—Sub-classifications of records that often have common retention periods

# Retention period for actuarial records

- State of NY has specific rules for insurance industry on document retention rules
  - <http://www.ins.state.ny.us/ogco2005/rg050332.htm>
- Every state requires employer to maintain adequate insurance records
- Records are adequate, accessible, consistent, and orderly and comply with state record retention requirements- *NAIC Market Conduct Examiners Handbook - Chapter VII, Section A, Standard 6*
- Document retention rules vary from state to state for the same document
- A seven year retention period will generally meet state requirements
- Actuaries must get familiar with the state's document retention rules



# Records retention and destruction...



25

- ❑ Retains and disposes of records in compliance with the Company's policy, applicable laws and regulations
- ❑ Assigns a set period of time for which all records, by category or type, regardless of format, will be preserved
- ❑ Automatically disposes of records at the end of the retention period
- ❑ Meets business, operational and legal requirements
- ❑ Most importantly, acts as an organization's safe harbor during litigation

# Program Execution

26

## Analysis

- Review records management policy and procedures and create/update if necessary
- Conduct business process analysis
- Document requirements and secure approvals, including budget

## Design

- Complete system design document and secure approvals
- Develop ERM solution

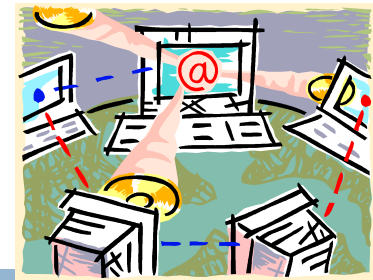
## Acceptance

- Conduct IT and user acceptance testing and revise system as appropriate based on feedback
- Execute a business pilot using real data and revise system as necessary

## Deployment

- Develop a manageable plan for deployment
- Provide associates with the training and support to succeed

# Lessons Learned



27

- ❑ Be prepared: Designing and implementing a full records management program, including an ERM solution, is not cheap or easy
- ❑ Build a network of business champions
- ❑ Enlist an executive sponsor and make sure the program is a corporate priority
- ❑ Listen to the business—and make sure IT does the same
- ❑ Develop a practical solution for legacy data migration or storage
- ❑ Make sure that IT has the commitment, tools, expertise and resources to support the program
- ❑ Use the crawl-walk-run model for deployment
- ❑ Recognize that change is tough. Going from the paper to electronic worlds is challenging

# ASOPs and Code

# Code of Professional Conduct and ASOPs

29

Professional standards (the Code, ASOPs and Qualification Standards) are strong evidence of generally accepted practice, a key element in any malpractice action.

# Changing environment requires defensive consulting

30

- Compliance with professional standards and internal policies and procedures
- Appropriate documentation
- Complete disclosure
- Proper communication

# Why should you comply with ASOP?

31

- It is a good practice
  - ▣ Less likely to miss important points
  - ▣ Work will be clearer
  - ▣ Others actuaries can follow your work more easily
  - ▣ It is the right way to do your job
- It is important if your work is challenged

# Compliance with Professional Standards

32

- Actuaries are required to comply with the Code
  - ▣ Professional Integrity
  - ▣ Qualification Standards
  - ▣ Actuarial Standards of Practice (ASOPs)

Failure to comply with Code could be an issue:

- ▣ Actuarial Board for Counseling and Discipline
- ▣ Courts



# Compliance with Professional Standard Applicability

33

- Standards apply to members of
  - American Academy of Actuaries
  - American Society of Pension Professionals and Actuaries
  - Casualty Actuarial Society
  - Conference of Consulting Actuaries
  - Society of Actuaries

# Actuaries dilemma

34

- Actuarial work is quite complex, uses highly specialized mathematical and statistical concepts arrays of assumptions, manipulation of data and sophisticated computer modeling.
- Some of these concepts can not be easily explained in simple, understandable language.
- Also there is a tendency for some actuaries to lapse into actuarial jargons and technical terms when communicating with layman persons.
- Due to nature of the subject, the actuarial profession attracts individuals who are “things oriented” and not “people oriented”

# Users dilemma

35

- ❑ Most users have limited mathematical skills which make it more difficult for them to understand, at time, the basic underlying mathematical and statistical concepts.
- ❑ Sometimes users are only interested in the “final” answers and want to avoid being dragged down in details.
- ❑ Accurate information may not be of benefits to the users if it is too technical for them to understand
- ❑ Users often fail to appreciate the constraints placed on actuaries and their work products by professional standards, regulations, accounting requirements and potential for litigation.

# ASOP can help

36

ASOP is a very effective tool that can help to bridge the communication gap between actuaries and users

- Identify which ASOPs apply
- Read all applicable professional standards;
- Conform work to the standards

# When you deviate from ASOP

37

- Describe the nature, rationale and effect of the deviation in an appropriate actuarial communication;
- *Review the implication of deviation and risk*
- Be prepared to defend your work
- Deviations can cause problems in litigation.

# Actuarial Communication

# Actuarial Communication

## Definition

39

### Code of Professional Conduct

- A written, electronic, or oral communication issued by an Actuary with respect to Actuarial Services

# Actuarial Communication

## Current Status

40

- Everyone agrees that without proper and effective communication, the actuarial profession could not adequately serve the actuarial needs of the public
- A good number of users (non-actuaries) of actuarial products feel that actuaries did not do an acceptable job of communicating the nature of actuarial work
  - ▣ A Critical Review of the U.S. Actuarial Profession (CRUSAP)
- As a result, an excellent actuarial work product, when poorly communicated, may be perceived as a poor work product



# Successful Communication Strategy

## Clear communication

41

- The ability to write clear, concise and effective reports, presentations, letters and other materials is a critical skill needed to communicate actuarial information
- Refining and communicating complex information to senior executives, decision-makers, board members and clients can only be done by:
  - Keeping in mind the entire audience
  - Simplifying complex information for non-actuarial audiences
  - Avoiding jargon and technical terms, when possible
  - Providing an explanation of technical terms used
  - Having all documents peer reviewed, including emails

# Successful Communication Strategy

## Clear communication

42

- Practice using clear writing and plain language without diminishing any technical actuarial content
- Seek help for difficult technical documents to make them clear and concise
- Use charts and graphs when possible
- Use rounded figures for estimates and projections. Results shown to the exact dollar may create unintended and unrealistic expectations about the accuracy of the numbers for users and a jury

# Successful Communication Strategy

## Technically correct communication

43

- Are actuarial methods and assumptions appropriately described and supportable?
- Does population data seem reasonable?
- Does the advice seem reasonable?
- Do the results fall within reasonable expectations?
- Do the numbers make sense?
- Have appropriate caveats and limitations been communicated?
  - Limit reliance on work product to client and other specified users (e.g., the client's auditor) only for specified purpose(s)
  - Limit use of work product to those specified in document

# Successful Communication Strategy

## Technically correct communication

44

- Have applicable laws, regulations and guidance from governing and professional bodies been appropriately reflected?
- Have uncertainties (e.g., in data, contracts, plan documents, applicable regulations) been appropriately addressed?
- Are applicable Actuarial Standards of Practice (ASOPs) appropriately reflected?

# Actuarial Reports

## Method, Assumptions, Data

45

- Data
  - Census information
  - Asset information
  - Plan provisions
- Assumptions
  - Prescribed (by who?)
  - Not prescribed
- Methods
  - Prescribed (by whom?)
  - Not prescribed

# Email risks

46

- People exercise less caution
- Informal and easy to send
- People just type and click – no second draft
- Quick interchange and unlimited accessibility
- Forgotten email – often included in lawsuits

# Emails May Also Need To Be Peer Reviewed

47

- Email is a formal, written record, subject to discovery
  - Be careful when you put words in writing
  - All email can be peer reviewed
  - Emails are discoverable and may be produced in litigation, arbitrations and investigations unless protected by attorney-client privilege (waiver may apply)
- Emails should be treated as a business record and subject to the firm's document retention policy
- Inappropriate use of email may result in disciplinary action by actuary's employer
- Actuary's emails may be monitored for compliance with firm's policies and procedures

# Actuarial Communication

## Important considerations

48

- Compliance with firm-wide policies and procedures
- Appropriate documentation
- Appropriate disclosure
- Proper communication
- Periodic audit of work products



# Actuarial Communication

## Important considerations

49

- “What if” scenarios – may be appropriate to show results under optimistic and pessimistic conditions
- Use of proper disclaimers / caveats
- Advance warnings (“no surprises”)
- Adequate peer review at the right level and properly documented
- Realistic time frames
- Compliance with Actuarial Standards of Practice

# If you still don't think Actuarial Communication is important, think again

50

- Proper communication reduces risks
- Improper communication
  - ▣ Results in dissatisfied clients
  - ▣ Opens the door for litigation
  - ▣ Can provide ammunition for plaintiffs

# Actuarial Communication

## Final thoughts

51

- Know the risks you face in communicating actuarial information
- Actuarial Communications are very dependent on context
- Actuarial Communications help improve the value of your work
- Remember-The ASOPs are your friend!
- Get familiar with ASOPs

# **BUSINESS ETHICS**

**Deciding what is right and doing it  
...even if it costs more**

# What are “ethics?”

53

- Ethics are standards of conduct that guide decisions and actions based on duties derived from core values.
- Ethical behavior leads us to do the right things even when it costs more than we want to pay for them.
- Unethical behavior can save us cost but will compromise our core values.

# Survey report on unethical behavior

54

One third of US employees surveyed admitted they have seen a co-worker engage in unethical behavior.

90% of those witnessing unethical behavior did not report the unethical behavior to anyone in authority.

# How to make ethical decisions

55

Exercise good judgment and sound reasoning.

Rely upon accepted ethical approaches.

Rely on applicable codes of conduct and ethics.

# Ethical standards

56

## **Some Helpful Tips**



# Behavior in the workplace

57

***Conduct yourself in a manner that displays a positive image and good ethical behavior***

Be tolerant of other people's beliefs and values.

Treat everyone with dignity and respect.

Deal with conflict and confrontation in a constructive manner.

# Behavior in the workplace (cont'd...)

58

Admit mistakes and take responsibilities.

Help to foster a culture of trust with your supervisors and colleagues.

Communicate issues that could have adverse impact on your firm promptly.

# Confidentiality

59

## *Respect confidentiality and privacy*

Respect the confidentiality of information acquired during the course of performing services.

Client information should not be used or disclosed without proper authority unless there is legal or professional responsibility to disclose.

# Professional Competence

60

***Perform actuarial services only where you are qualified to do so***

Do not overstate your capabilities.

Do not do work that you are not competent to do.

Comply with professional qualification (continuing education) standards.

# Personal gain

61

***You should not advance your own personal interest at the expense of the firm, clients or colleagues***

Do not use confidential information for personal gain.

Do not accept material gifts and entertainment.

Do not participate in or influence a decision that may result in a personal gain for an immediate family member or gain for someone with whom you have a close relationship.

# Conflict of interest

62

*You should maintain the highest level of professional integrity, objectivity and independence*

Don't get involved with a client where you have a business interest which might influence your judgment concerning the activity you are expected to carry out.

Before accepting assignments, consider whether a relationship exists that could give rise to conflict of interest.

## Conflict of interest (cont'd...)

63

If conflict exists, ensure that adequate safeguards are applied and it is fully disclosed and acceptable to all parties.

If conflict of interest can not be resolved, there is no other recourse but the actuary must resign from the assignment.

# Professional behavior

64

*You should remember you have a duty to do what is right for everyone, not just what is right for the individual client or the firm*

Advise only in a worthy and truthful manner refraining from misleading or exaggerated statements concerning what you will be performing. Have knowledge and comply with Code of Ethics of your firm and other organizations related to your profession.



# Data Privacy and Security Issues

# Data Privacy and Security Issues

66

- Actuaries need places to store institutional knowledge and data
- Frequently such data include Personally Identifiable Information (PII)
- The security and confidentiality of this data is of critical importance

# Security overview

67

There are four key issues in the security of the database

- Availability
- Authenticity/Verifiability
- Integrity
- Confidentiality

# Countermeasures

68

## Handling of PII

- Do not collect any PII that is not required
- PII may be transferred (electronically and non-electronically) across national borders only in compliance with the laws of the source country.

# Countermeasures

69

## Personnel

- – **Security Policy and Procedures, avoid using SSN**
- – **Training and Awareness**
- – **Physical Security**
- – **Dedicated Management**
- – **Peer review**

## Technology

- – **Firewalls**
- – **Virus Protection**
- – **Authentication and Authorization**
- – **Communication platform - Secured site**
- – **Encryption**
- – **Data and Information Backup**

# Privacy Breaches

70

- Privacy breaches can occur when sensitive data is lost, even if there is no evidence that lost data is found by an unauthorized user

# Common data security breaches

71

- ❑ E-mails with sensitive data sent to incorrect addresses
- ❑ Data stored on lost laptops
- ❑ Data stored on lost Blackberries
- ❑ Data on lost memory sticks, CDs, etc.
- ❑ Personalized statements sent to incorrect recipients
- ❑ Accidentally leaving employee data files at unsafe places
- ❑ Loss of hard copy files
- ❑ Privacy loss due to transfer of data to third party or abroad

# Reporting Privacy Breaches

72

- Internal Reporting:
  - ▣ Privacy and confidentiality breaches must be reported to appropriate authority
  - ▣ Seek help from legal counsel
- External Reporting
  - ▣ Reporting of data losses or other privacy or confidentiality breach
    - Reporting to the client involved
    - Reporting to the individual members where “personal identifiable information” is involved



# Reporting Privacy Breaches

73

- Cases of breaches may lead to
  - Development of remediation plans
  - Client requests to get access to investigation reports
  - Sharing of current policies and procedures
  - Monitoring for credit fraud for affected individuals
  - Other measures

# Peer Review

# Quality measures and audits

75

- Helps to deliver more consistent products and services
- Quickly addresses any problems that occur and will often reduce potential damage
  - Checking
  - Audit/post-release review
  - Peer review (pre-release)
  - Documentation

# Background information

76

- **Conference of Consulting Actuaries- Committee on Professionalism- On CCA website**  
(<http://www.ccactuaries.org>)
  - Peer review guidelines
- **AAA Peer Review discussion paper----On Academy website** (<http://www.actuary.org>)
  - 2005 edition replaced 1997 publication
- **Basic need to follow Code, ASOPs, Qualification Standards**

# Peer review

77

- Not a required measure but can be specially helpful for high risk assignments
- Large actuarial firms already have peer review policies in place
- Some smaller firms have peer review policies while others are looking into it

# What is peer review?

78

- Evaluation of a work product or an advice by an independent qualified professional
- Exchanging ideas, results, and answers to improve work product
- Generating ideas to ensure information communicated is reasonable and appropriate

# Peer review vs. checking

79

- ❖ Checking is more detailed than peer review
- ❖ Peer review is done to ensure results are reasonable
- ❖ Types of peer review
  - Peer review (pre-release)
  - Audit/post-release review

# Why peer review?

80

- Could improve compliance with Code, ASOPs, law/regulation and applicable actuarial practice & standards
- Could improve compliance with business and professional standards, thereby enhancing the quality of work
- Will help to satisfy Professional responsibilities
- Can develop expertise and improve skills



# Why peer review? (cont.)

81

- Could enhance the overall quality of the final work product
- May result in better advice in many cases
- May catch embedded errors before they become big
- May help to minimize errors and omissions exposure
- May help to write document clearly that can be understood by a broader audience

# Why peer review? (cont.)

82

- ▣ Client will have more confidence when the work products and advice they receive are peer reviewed
- ▣ May result in satisfied clients
- ▣ Can demonstrate that extra care was taken
- ▣ Can improve methodology and assumptions
- ▣ Can help to deliver creative and effective solutions to our clients' business problems

# Steps involved in Peer review

83

- ▣ Technical
- ▣ Consulting

# Technical peer review

84

- Have applicable laws, regulations and guidance been appropriately reflected?
- Are applicable Actuarial Standards of Practice appropriately reflected?
- Have uncertainties been appropriately addressed?
- Are actuarial methods and assumptions appropriately described and supportable?

# Technical peer review (cont.)

85

- Does population data seem reasonable?
- Does the advice seem appropriate?
- Do the results fall within reasonable expectations?
- Have appropriate caveats and limitations been communicated?
- Does the work deviate from standards? If so, disclose and ensure that that the work can be supported

# Consulting peer review

86

- Is the assignment well defined
- What question did the client ask?
- Does the question solve client's problem?
- Does the work performed appear to be consistent with the assignment?
- Does the actuarial analysis appear to be logical?
- Do proposed solutions appears to be appropriate?

# Consulting peer review (cont.)

87

- Are proposed solutions of value to the end user?
- Do recommendations appear to be consistent with professional and ethical standards?
- Have alternative solutions and approaches been explored?
- Do written communications appear to be clear?

# E-mail issues

88

- People exercise less caution
- Informal and easy to send
- People just type and click — no second draft
- Quick interchange and unlimited accessibility
- Peer review could help



# When to peer review?

89

- Peer review should start in early stages of the project, and should end with the review of the final product
- If peer review is not complete before the release, the document should be marked:
  - **DRAFT -- SUBJECT TO CHANGE UPON PEER REVIEW**
- Follow-up with final document after the review is completed

# Qualification for peer reviewer

90

- Proper education
- Technical knowledge
- Skills and experience
- Independent status
- As knowledgeable as the original actuary

# Scheduling and process

- Agree on what type of peer review needed
- Agree well in advance on a schedule
- Provide supporting documentation to peer reviewers
- Document peer review

# Reconciling Differences of Opinion

92

Peer reviewer valid advice should not be ignored

- Don't leave issues unresolved
- Identify alternatives to resolve disagreement
- Engage third party
- ABCD for counseling
- Ultimate responsibility for work product

# Questions?