

IAIS Consultations

Print view of your comments on "Consultation on ICPs 3 and 25 and ComFrame material integrated with ICP 25 (Public version)" - Date: 01.06.2017, Time: 22:44

Organisation	International Actuarial Association
Jurisdiction	International
Role	Other (not IAIS Member)
Other Roles	Not Potential IAIG
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Treat my comments as confidential	No

Question	
Answer	Q1 General Comment on ICP 3 <p>The re-written contents of ICP 3 are well organized, faithful to the intent of the ICP and are generic to both the supervision of insurers and insurance groups (including IAIG's). The proposed version of ICP 3 reads much better than the current version. As proposed by the IAIS, there seems no need for supplementary ComFrame material within this ICP.</p>
Answer	Q2 Comment on Standard ICP 3.1 <p></p>
Answer	Q3 Comment on Guidance ICP 3.1.1 <p></p>
Answer	Q4 Comment on Guidance ICP 3.1.2 <p></p>
Answer	Q5 Comment on Standard ICP 3.2 <p></p>
Answer	Q6 Comment on Guidance ICP 3.2.1 <p></p>
Answer	Q7 Comment on Guidance ICP 3.2.2 <p></p>
Answer	Q8 Comment on Guidance ICP 3.2.3 <p></p>
Answer	Q9 Comment on Guidance ICP 3.2.4 <p></p>

Answer	<input type="text"/>
	Q10 Comment on Guidance ICP 3.2.5
Answer	<input type="text"/>
	Q11 Comment on Guidance ICP 3.2.6
Answer	<input type="text"/>
	Q12 Comment on Standard ICP 3.3
Answer	<input type="text"/>
	Q13 Comment on Guidance ICP 3.3.1
Answer	<input type="text"/>
	Q14 Comment on Guidance ICP 3.3.2
Answer	<input type="text"/>
	Q15 Comment on Guidance ICP 3.3.3
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	Q16 Comment on Standard ICP 3.4
Answer	<input type="text"/>
	Q17 Comment on Guidance ICP 3.4.1
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	Q18 Comment on Guidance ICP 3.4.2
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	Q19 Comment on Guidance ICP 3.4.3
Answer	<input type="text"/>
	Q20 Comment on Guidance ICP 3.4.4
Answer	<input type="text"/>
	Q21 Comment on Guidance ICP 3.4.5
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	Q22 Comment on Guidance ICP 3.4.6
Answer	<input type="text"/>
	Q23 Comment on Standard ICP 3.5
Answer	<input type="text"/>
	Q24 Comment on Guidance ICP 3.5.1

Answer

Q25 Comment on Guidance ICP 3.5.2

Answer

Q26 Comment on Guidance ICP 3.5.3

Answer

Q27 Comment on Guidance ICP 3.5.4

Answer

Q28 Comment on Standard ICP 3.6

Answer

Q29 Comment on Guidance ICP 3.6.1

Answer

Q30 General Comment on ICP 25

Answer

The re-written contents of ICP 25 are well organized and read much better than the current version. In general, the ComFrame additions seem appropriate and well placed. The IAIS consultation does a much better job than previously of defining the roles of “involved supervisors”, “other involved supervisors”, “group-wide supervisors”, “head of insurance group” etc. The consultation clearly defines the need for IAIG’s to be supervised at the head of group level, which for IAIG’s includes a non-insurance holding company. It is clear from the ICP introductory remarks that ICP’s are to be applied in the supervision of insurance groups that are headed by an insurance legal entity. Unfortunately, this results in a standards cliff, at the group level, since the head of an insurance group which is a non-insurance holding company is not subject to IAIS standards unless it is an IAIG. Previously ICP 25.3 included a direct reference to branches: “Supervisors cooperate and coordinate in the supervision of an insurance legal entity with a branch in another jurisdiction in accordance with their authorities and powers.” The revised version includes no reference to branches directly and is generally quite permissive of the need for involved supervisors to work together (i.e., regardless of the form on business written in their jurisdiction – by subsidiary, branch, freedom of services, freedom of entry etc.). However, ICP 25.3 appears to inappropriately restrict involved supervisors to consideration only of “insurance legal entities in its jurisdiction”.

There are multiple places within ICP 25 and the embedded ComFrame language which offer a list of things involved with group supervision. Typically, the list might include things like governance, risk management, internal controls etc. Unfortunately, the occurrences of this list do not contain the same elements. No rationale is evident for including different elements in each list. • The IAA suggests that a common list be used unless there is a valid reason for differentiation. The occurrences of the list include 1) ICP 25.2.2 the 6th bullet, 2) ICP 25.3.2 6th bullet, 3) CF25.6a.3 and 4) ICP 25.6.10 2nd bullet. • The IAA notes that despite the importance of “control functions” in ICP 8 there is no reference to them in these aforementioned lists or anywhere in the revised ICP 25 (including ComFrame). The IAA recommends that the previously mentioned occurrences of lists make reference to the need to review the “control functions at the entity and group level and across the group”.

The proposed ICP 25 properly references the importance of intragroup transactions, dependencies and inter-linkages (e.g. 25.2.2 and 25.7.7). However, the IAA suggests that the broader topic of “connectivity” among the entities within a group be considered. Connectivity includes a range of specific linkages whether by ownership, transaction, investment, service agreement, organization structure, culture, centralization/decentralization etc.

Q31 General Comment on ComFrame material in ICP 25

Answer	The ComFrame material provided appears appropriately placed and worded (apart from the comment on CF25.6a.3 provided above).
	Q32 Comment on Introductory Guidance ICP 25.0.1
Answer	
	Q33 Comment on Introductory Guidance ICP 25.0.2
Answer	
	Q33 Comment on Introductory Guidance ICP 25.0.2
Answer	
	Q33 Comment on Introductory Guidance ICP 25.0.2
Answer	
	Q34 Comment on Introductory Guidance ICP 25.0.3
Answer	
	Q35 Comment on Introductory Guidance ICP 25.0.4
Answer	
	Q36 Comment on Introductory Guidance ICP 25.0.5
Answer	
	Q37 Comment on Introductory Guidance ICP 25.0.6
Answer	
	Q38 Comment on Introductory Guidance ICP 25.0.7
Answer	
	Q39 Comment on Introductory Guidance ICP 25.0.8
Answer	
	Q40 Comment on Standard ICP 25.1
Answer	
	Q41 Comment on Guidance ICP 25.1.1
Answer	
	Q42 Comment on Guidance ICP 25.1.2
Answer	
	Q43 Comment on Guidance CF25.1a.1
Answer	
	Q44 Comment on Standard ICP 25.2

Answer	<input type="text"/>
	Q45 Comment on Guidance ICP 25.2.1
Answer	<input type="text"/>
	Q46 Comment on Guidance ICP 25.2.2
Answer	<input type="text"/>
	Q47 Comment on Guidance ICP 25.2.3
Answer	<input type="text"/>
	Q48 Comment on Guidance ICP 25.2.4
Answer	<input type="text"/>
	Q49 Comment on Guidance ICP 25.2.5
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	Q50 Comment on Guidance ICP 25.2.6
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	Q51 Comment on Standard ICP 25.3
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	Q52 Comment on Guidance ICP 25.3.1
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	Q56 Comment on Guidance ICP 25.4.1
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	Q57 Comment on Guidance ICP 25.4.2
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	Q58 Comment on Standard ICP 25.5
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	Q59 Comment on Guidance ICP 25.5.1

Answer	
	Q60 Comment on Guidance ICP 25.5.2
Answer	
	Q61 Comment on Standard ICP 25.6
Answer	
	Q62 Comment on Guidance ICP 25.6.1
Answer	
	Q63 Comment on Guidance ICP 25.6.2
Answer	
	Q64 Comment on Guidance ICP 25.6.3
Answer	
	Q65 Comment on Guidance ICP 25.6.4
Answer	
	Q66 Comment on Guidance ICP 25.6.5
Answer	
	Q67 Comment on Guidance ICP 25.6.6
Answer	
	Q68 Comment on Guidance ICP 25.6.7
Answer	
	Q69 Comment on Guidance ICP 25.6.8
Answer	
	Q70 Comment on Standard CF25.6a
Answer	
	Q71 Standard CF25.6a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
Answer	
	Q72 Standard CF25.6a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q71 that would have to be made solely for purposes of ComFrame (please specify the currency)?
Answer	

Q73 Standard CF25.6a
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q71 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q74 Standard CF25.6a
Please provide the assumptions made to estimate the one-time costs (Q72) and the ongoing costs per year (Q73).

Answer

Q75 Standard CF25.6a
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q76 Comment on Guidance CF25.6a.1

Answer

Q77 Comment on Guidance CF25.6a.2

Answer

Q78 Comment on Guidance CF25.6a.3

Answer

Q79 Comment on Guidance CF25.6a.4

Answer

Q80 Comment on Standard CF25.6b

Answer

Q81 Standard CF25.6b
Does the IAIG currently fulfil the requirements of the standard? If "No" or "Partially", what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q82 Standard CF25.6b
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q81 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q83 Standard CF25.6b
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q81 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer	
	Q84 Standard CF25.6b Please provide the assumptions made to estimate the one-time costs (Q82) and the ongoing costs per year (Q83).
Answer	
	Q85 Standard CF25.6b Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
Answer	
	Q86 Comment on Guidance ICP 25.6.9
Answer	
	Q87 Comment on Guidance ICP 25.6.10
Answer	
	Q88 Comment on Guidance ICP 25.6.11
Answer	
	Q89 Comment on Standard ICP 25.7
Answer	
	Q90 Comment on Guidance ICP 25.7.1
Answer	
	Q91 Comment on Guidance ICP 25.7.2
Answer	
	Q92 Comment on Guidance ICP 25.7.3
Answer	
	Q93 Comment on Guidance ICP 25.7.4
Answer	
	Q94 Comment on Guidance ICP 25.7.5
Answer	
	Q95 Comment on Guidance ICP 25.7.6
Answer	
	Q96 Comment on Guidance ICP 25.7.7
Answer	
	Q97 Comment on Guidance ICP 25.7.8

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	Q98 Comment on Standard CF25.7a
Answer	<input type="text"/>
	Q99 Standard CF25.7a Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?
Answer	<input type="text"/>
	Q100 Standard CF25.7a What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q99 that would have to be made solely for purposes of ComFrame (please specify the currency)?
Answer	<input type="text"/>
	Q101 Standard CF25.7a What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q99 that would have to be made solely for purposes of ComFrame (please specify the currency)?
Answer	<input type="text"/>
	Q102 Standard CF25.7a Please provide the assumptions made to estimate the one-time costs (Q100) and the ongoing costs per year (Q101).
Answer	<input type="text"/>
	Q103 Standard CF25.7a Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).
Answer	<input type="text"/>
	Q104 Comment on Guidance CF25.7a.1
Answer	<input type="text"/>
	Q105 Comment on Guidance CF25.7a.2
Answer	<input type="text"/>
	Q106 Comment on Guidance CF25.7a.3
Answer	<input type="text"/>
	Q107 Comment on Guidance CF25.7a.4
Answer	<input type="text"/>
	Q108 Comment on Guidance CF25.7a.5
Answer	<input type="text"/>

Q109 Comment on Standard CF25.7b

Answer

Q110 Standard CF25.7b
Does the IAIG currently fulfil the requirements of the standard? If “No” or “Partially”, what changes would have to be made in order to comply with ComFrame (e.g. changes to resources, processes, structures, etc.) and to what extent would those changes have to be made solely for the purpose of ComFrame?

Answer

Q111 Standard CF25.7b
What are the one-time (initial) costs to the firm associated with the changes described in the answer to Q110 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q112 Standard CF25.7b
What are the ongoing costs to the firm per year (excluding one-time costs) associated with the changes described in the answer to Q110 that would have to be made solely for purposes of ComFrame (please specify the currency)?

Answer

Q113 Standard CF25.7b
Please provide the assumptions made to estimate the one-time costs (Q111) and the ongoing costs per year (Q112).

Answer

Q114 Standard CF25.7b
Please specify the benefits of fulfilling the requirements included in the standard (that are attributable solely to ComFrame). The benefit should be viewed in terms of meeting the overall standard and should be all encompassing (e.g. the benefit for the company as well as the benefits for policyholders, for the public, for financial stability, etc.).

Answer

Q115 Comment on Guidance CF25.7b.1

Answer

Q116 Comment on Guidance CF25.7b.2

Answer

Q117 Comment on Standard ICP 25.8

Answer

Q118 Comment on Guidance ICP 25.8.1

Answer

Q119 Comment on Guidance ICP 25.8.2

Answer

Q120 Comment on Guidance ICP 25.8.3

Answer

Q121 Comment on Standard ICP 25.9

Answer

Q122 Comment on Guidance ICP 25.9.1

Answer

Q123 Comment on Guidance ICP 25.9.2

Answer