



**ASSOCIATION ACTUARIELLE INTERNATIONALE
INTERNATIONAL ACTUARIAL ASSOCIATION**

**Proposed Final
International Standard of Actuarial Practice 5
Insurer Enterprise Risk Models
(ISAP 5)**

NOTE: Defined terms and references to ISAP 1 in this proposed final ISAP are marked in blue coloured text with dotted underline. The defined terms in the approved final ISAP will have hyperlinks to the relevant definition in the Glossary, and references to ISAP 1 and ISAP 1A will have hyperlinks to the relevant ISAP. Please note that the hyperlinks have not been created in this proposed final version.

**Developed by the
ISAP 5 Task Force of the
Actuarial Standards Committee**

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Preface

This International Standard of Actuarial Practice (ISAP) is a model for actuarial standard-setting bodies to consider.

The International Actuarial Association ([IAA](#)) encourages relevant actuarial standard-setting bodies to maintain a standard or set of standards that is substantially consistent with this ISAP to the extent that the content of this ISAP is appropriate for [actuaries](#) in their jurisdiction. This can be achieved in many ways, including:

- Adopting this ISAP as a standard with only the modifications in the Drafting Notes;
- Customizing this ISAP by revising the text of the ISAP to the extent deemed appropriate by the standard-setting body while ensuring that the resulting standard or set of standards is substantially consistent with this ISAP;
- Endorsing this ISAP by declaring that this ISAP is appropriate for use in certain clearly defined circumstances;
- Modifying existing standards to obtain substantial consistency with this ISAP; or
- Confirming that existing standards are already substantially consistent with this ISAP.

A standard or set of standards that is promulgated by a standard-setting body may be considered to be substantially consistent with this ISAP if:

- There are no material gaps in the standard(s) in respect of the principles set out in this ISAP; and
- The standard or set of standards does not contradict this ISAP.

If an actuarial standard-setting body wishes to adopt or endorse this ISAP, it is essential to ensure that existing standards are substantially consistent with [ISAP 1](#) and [ISAP 1A](#) as this ISAP relies upon [ISAP 1](#) and [ISAP 1A](#) in many respects. Likewise, any customization of this ISAP, or modification of existing standards to obtain substantial consistency with this ISAP, should recognize the important fact that this ISAP relies upon [ISAP 1](#) and [ISAP 1A](#) in many respects.

If this ISAP is translated for the purposes of adoption, the adopting body should select three verbs that embody the concepts of “must”, “should”, and “may”, as described in paragraph 1.6. Language of [ISAP 1](#), even if such verbs are not the literal translation of “must”, “should”, and “may”.

This ISAP is a model standard of actuarial practice and, as such, is not binding on any [actuary](#).

This ISAP was adopted by the [IAA](#) Council in [month year].

[Drafting Notes: when an actuarial standard-setting organization adopts this standard it should:

1. *Replace “ISAP” throughout the document with the local standard name, if applicable;*
2. *Modify references to [ISAP 1](#) and [ISAP 1A](#) in paragraphs 1.3., 2.2., 2.3.1., and 3.1. to point to the local standard(s) that are substantially consistent with [ISAP 1](#) and [ISAP 1A](#), rather than referring to [ISAP 1](#) or [ISAP 1A](#) directly, if appropriate;*
3. *Choose the appropriate phrase and date in paragraph 1.5.;*
4. *Review this standard for, and resolve, any conflicts with the local [law](#) and code of professional conduct; and*

5. *Delete this preface (including these drafting notes) and the footnote associated with paragraph 1.5.]*

Introduction

This International Standard of Actuarial Practice (ISAP) provides guidance to [actuaries](#) when performing [actuarial services](#) involving the use of [enterprise risk models](#) for insurers.

[Actuaries](#) play a principal role in assuring financial soundness of insurers, and their approach often includes the use of [enterprise risk models](#). Specifically, the central importance of [enterprise risk models](#) to insurance business management is clearly demonstrated in two of the Insurance Core Principles (ICP) published by the IAIS for assessment and supervision purposes: ICP 16 – Enterprise Risk Management for Solvency Purposes and ICP 17 – Capital Adequacy.

Increasingly, boards and senior managers of insurers rely on enterprise risk modelling for both regulatory and management decision-making purposes. As a result, insurers, their stakeholders, and other interested parties have a strong interest in the reliable operation and transparent governance of the use of [enterprise risk models](#). As employees or advisors, [actuaries](#) play an important role in advising insurers and others on the development or selection of the appropriate [models](#) and the related testing, validation, and interpretation of the outcomes.

This ISAP is intended to:

- Facilitate convergence in standards of actuarial practice in connection with insurer [enterprise risk models](#) within and across jurisdictions;
- Increase public confidence in [actuarial services](#) for enterprise risk management (ERM) purposes; and
- Demonstrate the [IAA](#)'s commitment to supporting the work of the IAIS in achieving effective insurer ERM practice internationally.

Section 1. General

- 1.1. Purpose** – This ISAP provides guidance to [actuaries](#) when performing [actuarial services](#) involving [enterprise risk models](#) for insurers. It is expected to help increase public confidence in the ERM work provided by [actuaries](#) by giving [intended users](#) confidence that:
- [Actuarial services](#) are carried out professionally and with due care;
 - The results are relevant to their needs, are presented clearly and understandably, and are complete; and
 - The assumptions and methodology (including, but not limited to, [models](#) and modelling techniques) used are disclosed appropriately.
- 1.2. Scope** – This standard applies to [actuaries](#) when performing [actuarial services](#) involving the selection, modification, development, and use of [enterprise risk models](#), including [stress tests](#) and [scenario tests](#), to assess solvency, assess capital adequacy, and produce risk metrics for ERM programs of insurers.
- 1.3. Relationship to ISAP 1 and ISAP 1A** – Compliance with [ISAP 1](#) and [ISAP 1A](#) is a prerequisite to compliance with this ISAP. References in [ISAP 1](#) and in [ISAP 1A](#) to “this ISAP” should be interpreted as applying equally to this ISAP 5, where appropriate.
- 1.4. Defined Terms** – This ISAP uses various terms whose specific meanings are defined in the Glossary. These terms are highlighted in the text with a dashed underscore and in blue, which is a hyperlink to the definition (e.g., [actuary](#)).
- 1.5. Effective Date** – This ISAP is effective for {[actuarial services](#) performed/[actuarial services](#) commenced/[actuarial services](#) performed for a [valuation date](#)}¹ on or after [Date].

¹ [Phrase to be selected and date to be inserted by standard-setter adopting or endorsing this ISAP.].

Section 2. Appropriate Practices

- 2.1. Understanding of Risk and Uncertainty** – The [actuary](#) should have, or obtain, sufficient understanding of the nature of risk and uncertainty in relation to the subject of the [work](#). In performing services related to risk assessment, the [actuary](#) should consider, or may rely on others who have appropriately considered, the following:
- 2.1.1. Information about the financial strength, risk profile, business management, and risk environment of the insurers that is relevant to the assignment;
 - 2.1.2. Information about the insurer’s own risk management framework and approach, including its attitude to the assumption of risk as relevant to the assignment; and
 - 2.1.3. The relationship between the insurer’s financial strength, risk profile, business management, and risk environment as identified in 2.1.1. above, and the insurer’s risk management framework and approach as identified in 2.1.2. above. If, in the [actuary](#)’s [professional judgment](#), a significant inconsistency exists, then that inconsistency should be reflected in the risk assessment and disclosed in the [report](#).
- 2.2. Proportionality** – In applying [ISAP 1](#) paragraph 1.5. Reasonable Judgment, and in particular paragraph 1.5.2., the [actuary](#) should also consider proportionality in respect of the nature, scale and complexity of the underlying risks.
- 2.3. Assumption Setting**
- 2.3.1. When choosing or advising on the choice of assumptions for inclusion in the insurer [enterprise risk model](#), in addition to following [ISAP 1](#) paragraphs 2.7. Assumptions and Methodology Set by Actuary and 2.8. Assumptions and Methodology Prescribed, the [actuary](#) should consider factors including, but not limited to, the following:
 - a. Internal policies, likely management actions, and experience with past history of management actions;
 - b. Contractual requirements, policy wording, and past experience;
 - c. Factors outside of management control, such as policyholder behaviour, taxation, regulatory requirements, and reserving requirements; and
 - d. Risk mitigation techniques, such as reinsurance and hedging, and any limitations to these techniques.

The [actuary](#)’s assumptions should normally reflect the actual situation as of the [valuation date](#), modified for any known or expected future changes.
 - 2.3.2. When constructing or advising on the construction of insurer [enterprise risk models](#), the [actuary](#) should be satisfied that the assumptions are reasonable by obtaining information from appropriate sources, such as:
 - a. Management of the insurer being modelled;
 - b. Knowledgeable persons at the insurer;
 - c. The insurer’s business plan and, if available, the most recent assessment of how the insurer will function under severely adverse scenarios;
 - d. External industry experts;
 - e. Requirements of [law](#); and

f. Other subject matter experts.

2.3.3. When probability distributions are incorporated into a [model](#), the [actuary](#) should be satisfied that the assumed distributions and correlations are appropriate relative to historical information and anticipated future changes, and should also consider the possibility of plausible extreme values. In this regard, for each risk factor, the [actuary](#) should provide an explanation of the differences between the incidence of actual extreme events included in the historical data and the potential incidence of extreme events in the [enterprise risk model](#). The various probability distributions and their related co-dependencies should recognize the possibility of simultaneous extreme values from multiple risk factors.

2.4. Stress Testing and Scenario Testing

2.4.1. In relation to [stress tests](#) or [scenario tests](#), the [actuary](#) should disclose:

- a. The significant assumptions used in the [stress test](#) or the [scenario test](#), including the actions assumed to be taken by management; and
- b. Any known limitations of the [stress test](#) or the [scenario test](#) and include an assessment of the potential impact of these limitations on results.

2.5. **Assessing Consistency Among Models** – Multiple [models](#) and multiple [stress tests](#) or [scenario tests](#) are often developed for different purposes for the same insurer (e.g., accounting requirements, regulatory valuation, or risk evaluation to determine capital needs).

Where practical, the [actuary](#) should assess the reasons for and the impact of using multiple [models](#) and multiple [stress tests](#) or [scenario tests](#) and provide an explanation of any material differences in results.

Section 3. Communication

- 3.1. Disclosures** – In addition to complying with [ISAP 1](#) Section 3. Communication and [ISAP 1A](#) Section 3. Communication, the [actuary](#) should disclose in the [report](#):
- 3.1.1. Any significant inconsistency that exists between the insurer’s financial strength, risk profile, business management, and risk environment as identified in 2.1.1. and the insurer’s own risk management framework and approach as identified in 2.1.2. (2.1.3.);
 - 3.1.2. An explanation of the differences between experience data and potential extreme adverse values in the risk [model](#) (2.3.3.);
 - 3.1.3. An explanation of the differences between the experience data and the incidence of multiple extreme events in the [enterprise risk model](#) (2.3.3.);
 - 3.1.4. The significant assumptions used in the [stress test](#) or [scenario test](#), including the actions assumed to be taken by management (2.4.1.a.);
 - 3.1.5. Any known limitations of the [stress tests](#) or [scenario tests](#) and an assessment of the potential impact of these limitations on results (2.4.1.b.); and
 - 3.1.6. An appropriate explanation of any material differences in results if multiple [models](#) and multiple [stress tests](#) and [scenario tests](#) are used by the insurer (2.5.).