



Deadline: 31 October 2017

Please use this template to comment on the [Exposure Draft of ISAP 1 on General Actuarial Practice](#), and the proposed revisions to the [Glossary](#). The IAA invites comments on this Exposure Draft, particularly on the questions set out below. Comments are most helpful if they:

- (a) Comment on the questions as stated;
- (b) Indicate the specific paragraph or group of paragraphs to which they relate;
- (c) Contain a clear rationale; and
- (d) Include any alternative that the IAA should consider, if applicable within the scope of ISAP 1.

Identification and instructions		
Name of Individual:	Please indicate if your comments are personal, or represent your organization:	Philip Shier – comments on behalf of association
Name of organization		Society of Actuaries in Ireland
Disclosure of comments:	Please indicate if your comments should be treated as confidential, and if so why:	Not confidential
Instructions for filling in and sending the template	<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not write in the yellow shaded cells ⇒ Write in the white cells ⇒ When commenting on a specific paragraph: <ul style="list-style-type: none"> ○ Please use a separate row for each paragraph, sub paragraph, or bullet. ○ Please include the full reference in the first column such as “Introduction 3rd paragraph 2nd bullet” or “2.6.1.b.ii” ○ Please insert/append extra rows as needed. <p>Please send the completed template, renamed with the organization’s or individual’s name, attached in <u>Word Format</u>, to</p> <p>ISAPI.comments@actuaries.org</p>	



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	Specific Questions asked by the ASC	Response
Q1.	Is the time right to merge ISAP 1A into ISAP 1? If not why, and when (if ever) do you recommend that be done?	We see no compelling requirement that these be merged now or indeed at any future date, and we are concerned that by implementing this proposal the IAA is effectively forcing member associations, including the Society, to devote resources (which are primarily volunteer) to revisit their adoption of ISAP 1 in order to address consequences arising from the merger. Whilst associations could state that their standards require their members to perform work in a manner that is substantially consistent with ISAP 1 version 1.0 (or similar), linking standards to an out-of-date model standard is hardly a satisfactory approach.
Q2.	Is the time right to make the other updates to ISAP 1? If not why, and when (if ever) do you recommend that be done?	We have no objection to the other changes proposed to ISAP 1.
Q3	We typically ask the following questions about new ISAPs (rather than revisions). However, we repeat them here as they may be relevant.	
	a. Is the guidance clear and unambiguous? If not, how should it be changed?	
	b. Is the guidance sufficient and appropriate? If not, how should it be changed?	
	c. Is the guidance at the right level of detail? If not, what text should be omitted because it is too detailed? In what areas do actuaries need more detailed guidance?	
	d. Are there other matters that should be included in this standard? Are there some included here that should not be?	ISAP 1A element should not be included



	General Comments on the ISAP 1 Exposure Draft

Comments on specific paragraphs of the ISAP 1 Exposure Draft		
Full paragraph reference	Change proposed to the paragraph (markup preferred)	Reason the change is needed (can be kept very brief or left blank if obvious from the change)
1.4	Suggest delete "all" i.e. " <i>ISAP 1 provides guidance to actuaries on general actuarial practice when providing actuarial services.</i> "	
1.4.2.a	Wording is awkward - why not " <i>.....member of a team (which may include non-actuaries)</i> "	
1.5.2	Inserting (" <i>Principle of Proportionality</i> ") does not emphasise the importance of considering proportionality as is suggested	
1.7	Remove commas i.e. " <i>If the referenced document is amended or restated after the adoption date...</i> "	
2.10.2	Mixture of singular " <i>model</i> " and plural " <i>models</i> " here - suggest it be worded as referring to a single "model"	



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2.10.3	The last sentence relating to the disclosure of limitations might be better at the end of 2.10.4	
2.10.4	See above	

Comments on specific definitions in the Exposure Draft of the updated Glossary

Note that only the proposed revisions are open for comment

Defined Term	Change proposed to the definition (markup preferred)	Reason the change is needed (can be kept very brief or left blank if obvious from the change)
	None	

Comments on the change to ISAP 2 (i.e. change in paragraph 2.1)

	None
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