



Comment Template

Draft Statement of Intent to issue an International Standard of Actuarial Practice on Governance of Models (ISAP [1A])

1. Do you agree an ISAP is needed on governance of models?

Yes

No

2. Do you agree that the ASC should attempt to find a graceful way of merging ISAP [1A] into ISAP 1 at an appropriate time provided that can be done without disrupting the adoption of ISAP 1 or creating other problems for member associations?

Yes

No

3. Are any of the proposed topics inappropriate for inclusion in ISAP [1A]? If so, please explain why the particular topic should not be included.

SOx and Solvency 2 put the emphasis on slightly different things when it comes to models. SOx focuses more on the controls around usage of the model while Solvency 2 framework wants to make sure that development of the model meets certain standards before it is put into production and the usage itself is not part of the "Governance of the models" framework, it is dealt with separately. If this ISAP intends to combine the full scope of both then the outcome likely will be a very broad scope. To be effective we believe ISAP should be closer to the Solvency 2 framework (but aligned with SOx) and refer to different ISAP(s) for control framework on reporting.



4. What other topics should be included in ISAP [1A]?

Please explain why you wish guidance in this area and if appropriate provide an example to illustrate the issue.

It would be great to have this ISAP [1A] as aligned with SOx and Solvency 2 as possible because that would make the implementation much more straightforward. Additionally we suggest including some wording on appropriate design of the technical implementation focusing on the sustainability of the chosen solution as well as in some cases on the choice of the IT platform.

Name	
Organisation	Hungarian Actuarial Society
E-mail address	ugyvez@actuary.hu
Type of response	<input type="checkbox"/> Personal <input checked="" type="checkbox"/> Organization

IMPORTANT:

Please check if the relevant check boxes are ticked appropriately and save the file renamed with the organization's or individual's name (e.g., SOI_CommentTemplate_[NAME].Doc). E-mail the file as an attachment to SOI.ISAP1A.comments@actuaries.org, with "Governance of Models" in the e-mail header.