

Session 53PD: Are Your Models Ready for PBR?

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Model Governance Checklist

Some considerations for practicing life actuaries

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What the Checklist Is

- Intended as a potential "resource" for practicing life actuaries and others involved in actuarial model governance
- In response to the need for good model governance addressed in PBR regulation
- Potentially useful beyond PBR valuation modeling and wherever actuarial modeling is performed
- A collection of question-based considerations for the purpose of fostering awareness of the respective model governance concerns
- Aimed to foster awareness of model governance issues
- Non-exhaustive
- A work in progress



What the Checklist Is NOT

- NOT intended as an instrument for rating or assessing an organization's level of model governance
- NOT prescriptive in any way, and not constituting a list of model governance requirements
- NOT a list of questions intended to be directed towards any specific individual, actuary, or group (as the questions are intended only for organizational introspection)
- NOT the answer to model governance, but a potential tool that may aid in its development



Model Governance Functional Categories

- Governance Standards
- Modeling Process
- Assumptions Setting
- Input Data/Tables/Mapping
- Access Controls

System/Model Changes

- Model Selection/Versioning
- Consolidation of Results
- Reporting
- Analysis/Validation



Governance Standards (Sample Questions)

- Has a model governance framework been formally developed, documented, and adopted throughout the organization?
- Have model documentation standards been established and adopted throughout the organization?
- Are model governance protocols strictly enforced during quarterly and annual reporting? (Bypassing protocols may indicate a lack of management buy-in, and/or the need to better address fast-track changes.)



Modeling Process (Sample Questions)

Is there a formal model/system change request procedure?

- Are model outputs reproducible? (i.e., have the inputs and model versions been archived and has an operable version of the modeling software been retained?)
- Is there a single source or repository that documents the data flow/system processing from end-to-end?



Assumption Setting (Sample Questions)

- Has an assumption governance framework been formally developed, documented, and adopted throughout the organization? Does the framework include a centralized approach for common assumption setting and formal approval?
- Are experience studies performed on a regular schedule, and assumption updates performed at a consistent time each year?
- Is there a single source or repository that documents the data flow/system processing from end-to-end?
- Are assumptions documented and signed-off in accordance with a specified process?



Input Data/Tables/Mapping (Sample Questions)

- Are model input feeds obtained automatically from a centralized data warehouse?
- Has the organization automated and standardized a set of test analytics for validation of model input?
- Are assumptions documented and signed-off in accordance with a specified process?
- Was the correct seriatim input data used?
- Are data sources well defined and documented?



Access Controls (Sample Questions)

Are access controls in place for models and modeling systems?

- Is there a documented process for granting access to models, systems, assumptions, reports, etc.?
- Are access levels reviewed on a regular basis?



System/Model Changes (Sample Questions)

- Are model and system changes achieved through a formal change management process? (Is there documented evidence?)
- Are there dedicated model/system/data stewards?
- Are test packs (or test beds) kept up to date with new models and product features?
- Are system/model errors adequately documented?



Versioning/Model Selection (Sample Questions)

- Have experienced modeling experts been involved in algorithm selection and implementation of modeling concepts?
- Are reports automatically labeled to indicate data and version sources?
- Are all the modeling components versioned? (i.e., the code, reports, test cases, etc.?)
- Was the correct model and version used?
- Was the "purpose" of the model documented?

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Consolidation of Results (Sample Questions)

Is the reporting process documented? And, is there specific documentation of the mapping describing how reporting levels are linked to each other?

Have all products been accounted for in the consolidated results?

Have consolidated results been adjusted to account for unmodeled business?

Are late adjustments to consolidated results implemented across all related fields (i.e., reflecting unmodeled premiums, but forgetting to account for unmodeled reserves)?



Reporting (Sample Questions)

- Are automated data feeds used to populate reports, as opposed to manual report preparation?
- Do the reports indicate how robust or sensitive key figures are, along with impacts due to estimation error of input parameters?
- Did the process owner and business owner sign off on the report?
- Are results communicated using institutionally accepted metrics that are commonly understood by the reporting audience?



Analysis/Validation (Sample Questions)

- Has the organization planned and budgeted for the time and cost of analysis of results?
- Are assumptions (including both deterministic and stochastic) given an independent review?
- Are test coverage reports available?
- Has an analysis of change from a validated model to a modified model been performed and documented?



Resource Documents

- "A Survey of Actuarial Modeling Controls in the Context of a Model-Based Valuation Framework" (Society of Actuaries, Dec. 2012)
- "System Access and Change Controls" (Society of Actuaries: The Modeling Platform, Dec. 2015)
- "Model Validation for Insurance Enterprise Risk and Capital Models" (© 2014 Casualty Actuarial Society, Canadian Institute of Actuaries, Society of Actuaries, all rights reserved)
- "Report from the Actuarial Processes and Controls Best Practices Working Party" (Institute and Faculty of Actuaries, May 2009)*

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