

2018 Predictive Analytics Symposium

Session 36: Model Governance in an Open Source World

[SOA Antitrust Compliance Guidelines](#)

[SOA Presentation Disclaimer](#)

Model Governance in an Open Source World

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 Rohan N Alahakone



SOA Antitrust Compliance Guidelines

Active participation in the Society of Actuaries is an important aspect of membership. While the positive contributions of professional societies and associations are well-recognized and encouraged, association activities are vulnerable to close antitrust scrutiny. By their very nature, associations bring together industry competitors and other market participants.

The United States antitrust laws aim to protect consumers by preserving the free economy and prohibiting anti-competitive business practices; they promote competition. There are both state and federal antitrust laws, although state antitrust laws closely follow federal law. The Sherman Act, is the primary U.S. antitrust law pertaining to association activities. The Sherman Act prohibits every contract, combination or conspiracy that places an unreasonable restraint on trade. There are, however, some activities that are illegal under all circumstances, such as price fixing, market allocation and collusive bidding.

There is no safe harbor under the antitrust law for professional association activities. Therefore, association meeting participants should refrain from discussing any activity that could potentially be construed as having an anti-competitive effect. Discussions relating to product or service pricing, market allocations, membership restrictions, product standardization or other conditions on trade could arguably be perceived as a restraint on trade and may expose the SOA and its members to antitrust enforcement procedures.

While participating in all SOA in person meetings, webinars, teleconferences or side discussions, you should avoid discussing competitively sensitive information with competitors and follow these guidelines:

- **-Do not** discuss prices for services or products or anything else that might affect prices
- **-Do not** discuss what you or other entities plan to do in a particular geographic or product markets or with particular customers.
- **-Do not** speak on behalf of the SOA or any of its committees unless specifically authorized to do so.
- **-Do** leave a meeting where any anticompetitive pricing or market allocation discussion occurs.
- **-Do** alert SOA staff and/or legal counsel to any concerning discussions
- **-Do** consult with legal counsel before raising any matter or making a statement that may involve competitively sensitive information.

Adherence to these guidelines involves not only avoidance of antitrust violations, but avoidance of behavior which might be so construed. These guidelines only provide an overview of prohibited activities. SOA legal counsel reviews meeting agenda and materials as deemed appropriate and any discussion that departs from the formal agenda should be scrutinized carefully. Antitrust compliance is everyone's responsibility; however, please seek legal counsel if you have any questions or concerns.

Presentation Disclaimer

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FEATURED ARTICLES

An Open Source

Model governance in an open-source world

ROHAN N. ALAHAKONE AND DOROTHY L. ANDREWS

JUNE/JULY 2018



Old School Approach

Step 1: Define Problem

Step 2: Write Specs

Step 3: IT Project Queue

Step 4: IT Business Analyst

Step 5: IT Resource Assigned

Business-IT Alignment

Install a High-Level IT Liaison

Why The right person in the right place can materially affect the success of your technology initiatives.

What you should know Qualified candidates are rare—and are worth their weight in gold.

Source: <http://www.baselinemag.com/c/a/Past-News/BusinessIT-Alignment>

Old School Approach

Step 6: IT BA Review

Step 7: BA & Actuary Review

Step 8: Errors Identified

Step 9: Program Corrections

Step 10: Iterate Steps 6 to 9
until

Business-IT Alignment

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Your solution has arrived!!!





What Did I Do?

**Remember
this
feeling?**





How many days
did it take to build

Rome?





Model Validation – A Governance Activity

1996 Goldman Sachs Quantitative Strategies Research Note

- ① Inapplicable model
- ② Incorrect model
- ③ Correct model, incorrect solution
- ④ Correct model, inappropriate use
- ⑤ Badly approximated model
- ⑥ Software and hardware bugs
- ⑦ Unstable data



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Introduction

- What is open source vs closed source
- What is model governance
- Applicability



Establishing a model governance framework

Step 1: Set up the environment

Step 2: Define the scope

- Choose the models and processes to be governed
- Establish the rules





Establishing a model governance framework

Step 3: Appoint the Model Steward

The primary responsibility of the model steward is to make sure the instituted model governance framework processes and controls are followed.

Makings of a Model Steward





Roles within a model governance framework

- Model users
- Model developers
- Model approvers





Roles within a model governance framework

- Sponsors of model change
- Model Steward
- Gatekeeper
- Model Owner

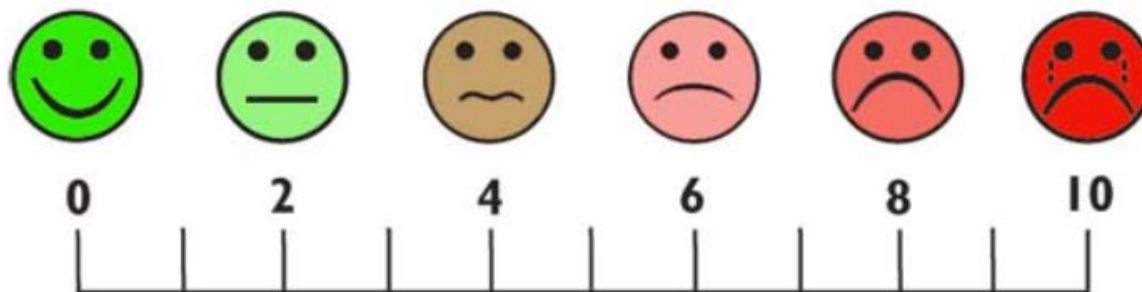




Establishing a model governance framework

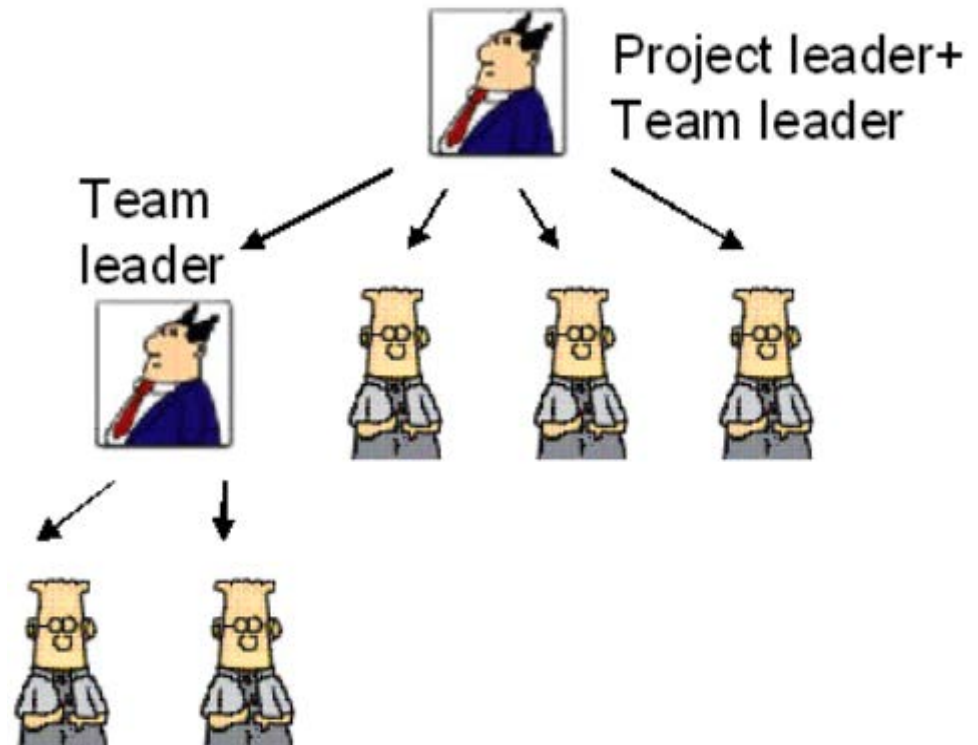
Early pain points/complaints:

- Protocol prevents making changes on-the-fly
- Perception of management's trust
- Too much red tape
- Too much time spent on documentation



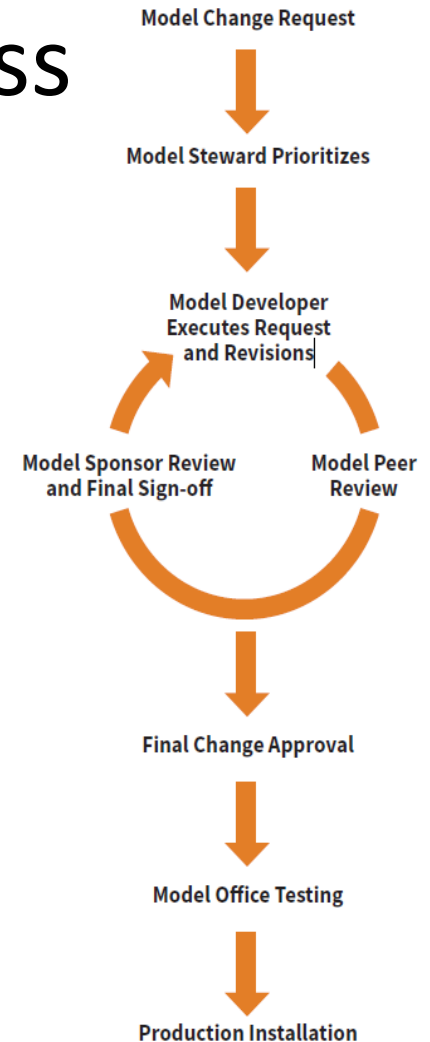
Separation of duties

- Conflicts
- Independence
- Dilution
- Expertise
- Review



Model Change Control Process

- Change request
- Prioritize request
- Model developer works on request
- Peer and sponsor review of change
- Change Approval
- Test and move to production



Standards, policies and rules

- Formal processes, rules and standards are in place and followed by all concerned:
 - Coding Standards
 - Peer Review
 - Change Analysis
 - Validation Standards
 - Documentation





Information Technology

- Modeling environment
- Software
- Dedicated team
- Applications





Open-Source Systems

Pros

- » Flexibility to make changes
- » Quicker turnaround time making changes
- » Likely less expensive as vendor is not responsible for customization
- » Unhampered creativity and innovation
- » Unlimited transparency

Cons

- » Lack of audit trails
- » In-house testing required
- » Inefficient source for computations
- » Staff need training in programming
- » Unauthorized programming changes
- » Need to standardize coding styles for conformity

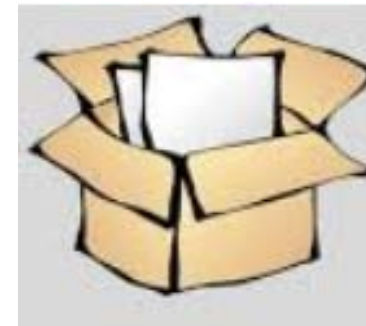
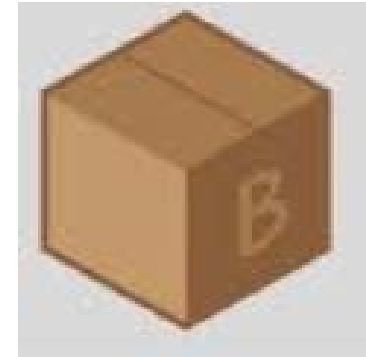
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In a closed source world...

- Vendor responsibility
- Regression testing
- Extent of analysis and review of code changes
- Process for model change requests
- Governance framework





Management commitment

- Management involvement in the model change control process
- Benefits of the governance framework
- There is no such thing as magic!



“What if we don’t change at all ...
and something magical just happens?”



Credibility – Ownership – Visibility – Documentation



Questions?

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