

#### 61 - Targeted Improvements: Data is the Real STAR!

SOA Antitrust Disclaimer SOA Presentation Disclaimer

# 2019 Valuation Actuary Symposium

SIEW CHEN OW, BEN NICHOLS, BRIAN CARTER, JOHN ADDUCI Session 61 – Targeted Improvements: Data is the Real STAR! August 27, 2019





### SOCIETY OF ACTUARIES 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**

Presentations are intended for educational purposes only and do not replace independent professional judgment. Statements of fact and opinions expressed are those of the participants individually and, unless expressly stated to the contrary, are not the opinion or position of the Society of Actuaries, its cosponsors or its committees. The Society of Actuaries does not endorse or approve, and assumes no responsibility for, the content, accuracy or completeness of the information presented. Attendees should note that the sessions are audio-recorded and may be published in various media, including print, audio and video formats without further notice.



# Objectives

• Discuss about data governance/management framework and how it can be applied to US GAAP LDTI and VM-51 regulations.



# **Topics for Discussion**

- Overview of Data Management?
- What is Data Governance?
- Case Study Actuarial Data Needs for VM-51 and Model Governance
  - Questions
- Case Study Data Needs to support GAAP LDTI on Market Risk Benefits
  - Questions



# Panelists and Moderator

# John Adduci

Vice President, Actuarial Services



Ben Nichols

Executive Director, Information Management

Brian Carter

Executive Director, Information Management

### Siew Chen Ow (Moderator)

Executive Director and Actuary, Global Analytics and In-Force Management





SOCIETY OF ACTUARIES

# What is Data Management and Data Governance?



# Data Management - Overview

A systematic approach to collecting, storing, securing, and sharing data that provides a framework by which your company uses data



- Data Governance
- Database Management
- Business Intelligence
- Data Quality
- Data Integration

- Master Data Management
- Data Security
- Data Modeling and Architecture
- Metadata Management



# What is Data Governance?

A collection of processes and tools that:

- Enforce data policies and standards
- Define data ownership/accountability
- Ensure data quality and consistency
- Protect a company's data assets
- Establish guidelines for proper data usage



## Why Do You Need Data Governance?





# Actuarial Data Needs for VM-51 and Model Governance: A Case Study



#### VM-51 Overview

- VM-51: "Experience Reporting Formats".
- Submissions will be made by end of September.
- Industry average experience report will be made available to the regulators on the following March 31.
- Collection of experience data provides a data base to establish industry experience tables or factors (e.g. valuation tables for PBR)
- 3 sub sections of data collection and report formats
  - Mortality
  - Policyholder behavior
  - Expenses.



### **CASE STUDY #1a:** VM-51 Data implementation

VM-51 Data Implementation:	<ul> <li>Traditional Life Insurance, FAS 60 type product. VM-51 Experience Reporting formats applies.</li> <li>Task is to create reports to feed the formats required for VM-51 for this block of business.</li> <li>Verify Results are correct and accepted by the regulators by the deadline (September 30).</li> </ul>
Methods / Challenges:	<ul> <li>IT / Actuarial model users will use the existing historical data build that experience studies use today and build out additional functionality.</li> <li>VM-51 requires some additional fields and the historical database needed to be modified. Determine all new requirements for VM-51 and whether changes are needed to support them.</li> <li>Generate first draft of reports and review. Verify results by auditing single coverages.</li> <li>Validate the existing and output files. Investigate any issues: <ul> <li>Rider coverages missing termination dates, PUA coverages missing monthiversary face amounts</li> </ul> </li> </ul>
Conclusions:	<ul> <li>Changes to the process for building data need to be reviewed by all stakeholders</li> <li>Regression Testing</li> <li>IT / Actuarial need to both be involved in testing any changes to the data produced</li> </ul>



### **CASE STUDY #1:** Communication and Defining Data

Description of work tasks, general	<ul> <li>Review of VM-51 and how that impacts data</li> <li>Review any other changes to data needs for new regulations (GAAP LDTI, for example).</li> <li>Review existing historical data built</li> </ul>
Challenges that need to be addressed	<ul> <li>IT / Actuarial model users will use the existing historical data build that experience studies use today.</li> <li>Determine how to build the actual historical cashflows for premiums and claims.</li> <li>VM-51 requires some additional fields and the historical database needed to be modified.</li> <li>GAAP LDTI requires as of 1/31/2021 the restatement of the past two years of financials. Therefore, the insurance company needs to develop cashflows starting with 12/31/2018.</li> <li>Consider the need for additional inputs to the process</li> <li>Validate the existing and output files</li> </ul>
Key takeaways	<ul> <li>Data Items – Discuss data mapping, validating results. Be conscious of timing issues</li> <li>Regression testing – Verify there are no unexpected changes to results.</li> <li>Governance issue – Communication is key. Discuss the process and discuss expectations.</li> </ul>



### **CASE STUDY #1b:** Data Governance

Model Conversion	<ul> <li>Traditional Life / FAS 60 type product.</li> <li>Statutory valuation, GAAP valuation, and Experience study maintained in one model with one data feed</li> </ul>
Methods / Challenges	<ul> <li>There is one model and all areas need to work off the model</li> <li>Combine three separate data feeds into one data feed used for all three purposes</li> <li>Different actuarial personnel support different models, all are now using the same database and model.</li> <li>Establish procedures around updating the data or model. Implementation testing should proceed any move to production</li> <li>Maintaining the model, model upgrade procedures</li> <li>Consistency of data from period to period</li> </ul>
Potential Upside:	<ul> <li>One model to maintain</li> <li>No need to explain differences between two different models within the same block of business</li> <li>Quicker to close since only one model is maintained</li> </ul>



### Data Governance: Case Study #1b

- One model is created and put into production
- Actuarial Staff has more time for analysis
- Management is happy with results and reduced time to close... but then:
- Actuary in charge of experience studies sees issues with actual to expected ratios. What is the root cause?
  - Death Benefit Field definition changed at some point
  - No record of when or who made the change
  - Possibly need to re-submit experience study results.
- How can this be avoided in the future?



# Governance Concepts and IT Practices That Promote Quality Data Solutions



# **Benefits of Effective Governance Practices**





# How do I get there?





# Moving from Compliance to Governance

# Compliance

- Focuses on policy enforcement
- Driven by legal and regulatory requirements
- Rigid guidelines often imposed by legal or risk departments
- Activities are reactive in nature

### Governance

- Goes beyond compliance to deliver business value
- Collaboration between business functions to meet organizational data needs
- Proactive approach to managing data



# Ensure Success of Your Data Initiatives

Know your target!



- Identify the business problem you are trying to solve
- Define the scope to maintain focus on your key goals
- Clearly document and communicate requirements to maintain alignment within the project team
- Engage stakeholders throughout the process



# Ensure Success of Your Data Initiatives

Minimize your risk!



- Avoid surprises by understanding your current state
- Determine who is using your data and for what purpose
- Consider the impact of alternative solutions (i.e. build new vs. modify)
- Develop a comprehensive test strategy that includes regression testing







# Case Study #2: Data Needs to support GAAP LDTI on Market Risk Benefits



# Market Risk Benefits (MRB)

- New concept: MRB and the definition of "protection"
- Definition of a Market Risk Benefit:
  - "A contract or contract feature that both provides protection to the contract holder from other-than-nominal capital market risk and exposes the insurance entity to other-than-nominal capital market risk"



Targeted Improvements (TI) will have a significant impact to actuarial reserving and reporting processes across long-duration products

#### Liability model for future policy benefits

**Cashflow Assumptions:** Updated to current estimate: "unlocking" with catch-up adjustments

**Discount Rate:** "Upper Medium Grade", two discount rates (locked in, current)

Net Premium Ratio: Capped at 100%

**Products:** "FAS60" products, e.g, Traditional Life, Health, Life-Contingent Payout Annuities

#### **Deferred Acquisition Costs**

**Simplified Model:** Amortization on a constant basis over the anticipated life of the contract

**One-way write down:** Adjust DAC balance actual terminations for the period in excess of expected

Products: All long-duration products

#### Market Risk Benefits

**New Classification:** Market Risk Benefits (MRBs), includes all types of "GMXB" benefits

Methodology: All MRBs measured at fair value

**Own Credit Risk:** Change in reserve due to change in own credit risk reported through other comprehensive income

**Products:** Variable Annuities, Fixed Indexed Annuities, Fixed Annuities

#### **Disclosure Requirements**

Enhanced Reporting: Reserve and DAC rollforwards, details about assumption and changes to assumptions

Products: All long-duration products



### **CASE STUDY #2:** GAAP LDTI for Market Risk Benefits (MRB)

Description of work tasks	<ul> <li>ASU 2018-12, aka GAAP LDTI, aka GAAP Targeted Improvements</li> <li>Update data provided to satisfy requirements</li> </ul>
Challenge that needs to be addressed	<ul> <li>Retrospective transition – resurrection of prior models</li> <li>Locked in Attributed Fee percentage at issue</li> <li>Multiple scenario runs required for close. Is computing power sufficient?</li> <li>Own Credit Spreads and other new model assumptions</li> <li>Aggressive implementation date, restatement of the past two years financials</li> <li>Disclosure Requirements / Analysis of Change for internal purposes.</li> </ul>
Key takeaways	<ul> <li>Data Archive – Is it accessible and complete? Can it be resurrected quickly? Do policy counts match prior reported model results</li> <li>Computing Resources – Projects that require more computing power need to be identified early so that resources can be allocated</li> </ul>



### Disclosure Requirements – ASU 2018-12

		-	Decembe	r 31, 20	X2		)ecembe	r 31, 20	X1
			riable nuities		lexed nuities		iable uities		lexed uities
Balance from prior run	Balance, beginning of year	\$	AAA	\$	FFF	\$	xxx	\$	xxx
• Prior Inforce, initial credit spread	Balance, beginning of year, before effect of changes in the instrument-specific credit risk		xxx		xxx		xxx		xxx
, 1	Issuances		XXX		XXX		XXX		XXX
<ul> <li>New Issuances</li> </ul>	Interest accrual		XXX		XXX		XXX		XXX
	Attributed fees collected		XXX		XXX		XXX		XXX
<ul> <li>Benefit Payments / Fees collected -</li> </ul>	Benefit payments		(XXX)		(XXX)		(XXX)		(XXX)
, .	Effect of changes in interest rates		xxx		XXX		XXX		XXX
Market Assumptions	Effect of changes in equity markets		XXX		XXX		XXX		XXX
	Effect of changes in equity index volatility		XXX		XXX		XXX		XXX
New Inforce: "Theta"	Actual policyholder behavior different from expected behavior		xxx		xxx		xxx		xxx
Unlocking Assumptions	Effect of changes in future expected policyholder behavior		xxx		xxx		xxx		xxx
<ul> <li>New credit spread —</li> </ul>	Effect of changes in other future expected assumptions		XXX	_	xxx	_	xxx	_	XXX
	Balance, end of year, before effect of changes in the instrument-specific credit risk		xxx		xxx		xxx		xxx
<ul> <li>Conclusion: Numerous data and</li> </ul>	Effect of changes in the instrument-specific credit risk	_	XXX		XXX	_	XXX		xxx
	Balance, end of year	\$	GGG	\$	ш	\$	AAA	\$	FFF
assumption requirements.	Reinsurance recoverable, end of year	\$	xxx	\$	xxx	\$	xxx	\$	xxx
Multiple runs required in time for	Balance, end of year, net of reinsurance	\$	XXX	\$	XXX	\$	XXX	\$	xxx
business close.									

December 24 20V2

the of onve

D .....

# Meet Increased Granularity Demands with Scalable Infrastructure



### Transition to Horizontally Scalable Platforms

#### Drivers for Increased Data Volume and Performance Demands

- Granularity: additional level of detail is needed to fulfill regulatory requirements
- Additional Calculations: multiple scenario runs required for close cycle
- Greater Historical Detail: increased breadth of historical data included in analysis



#### Vertical Scaling

Increasing capacity of existing hardware by adding resources

#### **Horizontal Scaling**

Increasing capacity by adding more servers to a clustered system that performs as one unit



# Leverage Cloud Scalability for Cyclical Workloads

Leverage Cloud capabilities to optimize performance-per-dollar

- Scale Up/Down
- Separate Compute from Storage





# Improve Operational Efficiency Through Automation

- Data Quality Reporting
- Workflow validation



# Actuarial Projection Workflow

#### Automate manual processes required to validate a projection run

- Data Input Validation: assess the quality, consistency, uniqueness, and logic of source data ingested
- End-to-End Workflow Validation: validate system processing and transformations are occurring as expected between each step for an individual run



# Data Profiling and Data Quality

Validate that the inputs into the actuarial modeling process are accurate for the intended use

- Data Profiling: leverage descriptive techniques and statistics such as min, max, mean, mode, percentile, standard deviation, frequency, and variation to find unexpected values
- Data Quality Rules: Utilize generic, industry specific, and custom rules to validate the correctness of the data for its intended use

#### **Example Data Quality Rules**

Type of Rule	Description	Example
Basic business rules	Basic business logic rules	Date of a claim cannot be before the date of policy inception
Data-type constraints	Values in a particular column must be of a certain type	Boolean, numeric, date
Range constraints	Numbers or dates should fall within a certain range	<ul> <li>Eligible age for contract must be &gt; 18</li> <li>Minimum premium amounts</li> </ul>
Mandatory constraints	Particular columns cannot be empty	Policy ID must contain a value
Unique constraints	A field, or a combination of field, must be unique across a dataset	Insured ID and Policy ID must be unique



# **Data Quality Monitoring**

Data Quality Monitoring is an ongoing process and should be tracked and managed over time

- **Classification**: The quality of the data is classified as either an incident, exception or an issue
- **Governance:** Roles and responsibilities for managing and resolving issues
- Issue Management Process: Tracking and workflows to resolve data issues
- Root Cause Analysis: Identifying the underlying cause of the data issues
- **Prioritization:** Evaluate impact of data quality issues and identify remediation efforts

Name	Rows Passed	Rows Failed	Passing Fraction	Result	Action Required
Policy Type Validation	87,000	8,000	91.6%	Passed	Continue Run – acceptable # of failures
Unique Policy ID	65,000	30,000	68.4%	Failed	Stop Run - Source system correct unique values error
Eligible Age Range	92,000	3,000	96.8%	Passed	Continue Run – acceptable # of failures
Zip Code NULL	90,000	5,000	94.7%	Passed	Zip Code immaterial to cash flow accuracy



# End-to-End Workflow Validation

Leverage Data Lineage capabilities to identify anomalies occurring in the end-to-end process Data Lineage: traces data from source to destination, identifying every move the data makes and taking into account any changes that occur for full traceability.

- Data Asset Linking: establish links between each data repository that is utilized for an end-toend process
- **Control Metrics**: leverage descriptive statistics on key measures(policy, face amount, term, etc..) to evaluate expected or unexpected behavior between each step in the process
- **Describe Transformation Processing:** provide explanations of transformations that are occurring at each step in the process

<b>Run ID:</b> 43223	Policies	Actuarial Engine	Post Model	Projections
Policy Count(Sum)	30,231	30,231	30,105 🕂	30,105
Face Amount(Sum)	232M	232M	212M 🕂	212M



# Compare change in output between periods and factors contributing to that change



# **Change Analysis**

Compare multiple runs and identify what has changed in the output and the cause of that change

	Mortality	Interest	Inforce	Reserves	Change in Reserves
Run 1	Prior	Prior	Prior	\$XXX,XXX	
Run 2	Current	Prior	Prior	\$YYY,YYY	\$UU,UUU
Run 3	Current	Current	Prior	\$ZZZ,ZZZ	\$QQ,QQQ
Run 4	Current	Current	Current	\$VVV,VVV	\$TT,TTT

Leverage data lineage and data validation testing capabilities to automate run comparisons









