INSTRUCTIONS TO CANDIDATES

General Instructions

1. This examination has a total of 80 points.

   This exam consists of 9 questions, numbered 1 through 9.

   The points for each question are indicated at the beginning of the question. Questions 8 and 9 pertain to the extension readings and/or the Case Study, which is enclosed inside the front cover of this exam booklet.

2. Failure to stop writing after time is called will result in the disqualification of your answers or further disciplinary action.

3. While every attempt is made to avoid defective questions, sometimes they do occur. If you believe a question is defective, the supervisor or proctor cannot give you any guidance beyond the instructions on the exam booklet.

Written-Answer Instructions

1. Write your candidate number at the top of each sheet. Your name must not appear.

2. Write on only one side of a sheet. Start each question on a fresh sheet. On each sheet, write the number of the question that you are answering. Do not answer more than one question on a single sheet.

3. The answer should be confined to the question as set.

4. When you are asked to calculate, show all your work including any applicable formulas.

5. When you finish, insert all your written-answer sheets into the Essay Answer Envelope. Be sure to hand in all your answer sheets because they cannot be accepted later. Seal the envelope and write your candidate number in the space provided on the outside of the envelope. Check the appropriate box to indicate Exam ERM-INV.

6. Be sure your written-answer envelope is signed because if it is not, your examination will not be graded.

Tournez le cahier d’examen pour la version française.
CASE STUDY INSTRUCTIONS

The case study will be used as a basis for some examination questions. Be sure to answer the question asked by referring to the case study. For example, when asked for advantages of a particular plan design to a company referenced in the case study, your response should be limited to that company. Other advantages should not be listed, as they are extraneous to the question and will result in no additional credit. Further, if they conflict with the applicable advantages, no credit will be given.
1. (5 points) You are an actuary at Myers Insurance Company, which offers a wide range of property and casualty insurance products. You have determined that the company’s concentration risk limits have been breached. You have recommended to management that they explore the option of transferring some of the risk to a third party.

Management is only willing to consider reinsurance that attaches at the risk limit.

(a) (1 point) Explain how reinsurance could be used to address Myers’ breach in risk limits.

Myers has the option of entering into one of the following two reinsurance agreements:

I. Hayden Re: Surplus reinsurance with $60 retention and $240 capacity
II. Tarpon Re: Excess of loss reinsurance with priority $50 and $100 capacity

Hayden Re has an AA credit rating, and Tarpon Re has an A- credit rating.

(b) (0.5 points) Compare and contrast surplus reinsurance with excess of loss reinsurance.

(c) (1.5 points) Calculate Myers’ retained claim for each of the following scenarios. Show your work.

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Sum Insured</th>
<th>Size of Claim</th>
<th>Retained Claim Agreement I</th>
<th>Retained Claim Agreement II</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>$100</td>
<td>$20</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>$300</td>
<td>$200</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

You have determined that entering into either one of these agreements will bring Myers back within its concentration risk limits.

(d) (2 points) Outline the considerations that would factor into making a recommendation between the two reinsurance options.
2. (8 points) Calusa Insurance Solutions is a large multi-line insurance company that offers life, health, property and casualty, and pension products. Calusa is undergoing changes within each insurance division, and management is concerned with the risks resulting from these changes.

(a) (2 points) Calusa’s Life Insurance division specializes in term life insurance. Currently all of Calusa’s term products use the same underwriting process. The underwriting process is very thorough, requiring a full medical examination. Calusa is considering the addition of a “simplified issue” term product. The simplified issue product would only require an applicant to answer a few questions regarding medical history, with no verification of the answers required. If an applicant answers the questions in an acceptable manner, the policy is issued. All approved applicants of the same age and gender receive the same premium rates.

(i) Describe the main risk that would be introduced by the simplified underwriting product.

(ii) Propose strategies to manage the risk identified.

(b) (2 points) Calusa’s Pension division offers a pension product to small and mid-size companies with defined benefit pension plans. The current pension product provides guaranteed immediate annuities to pension plan participants at their retirement, with level monthly payments for life. Calusa is considering the addition of a new pension product with a Cost of Living Adjustment (COLA) feature.

(i) Describe the main risk that would be introduced by the COLA feature.

(ii) Propose strategies to manage the risk identified.

(c) (2 points) Calusa’s Property and Casualty (P&C) division has recently experienced employee turnover in the claims department, resulting in experienced employees being replaced by new hires. In addition, Calusa hires temporary employees to assist with data entry during high volume periods.

(i) Describe the main risk associated with Calusa’s personnel practices.

(ii) Propose strategies to manage the risk identified.
2. **Continued**

(d) *(2 points)* Calusa’s Health division is in the process of implementing a new internet-based claims administration system. The new system would result in Calusa data being hosted on third party servers and allow Calusa employees to access this data remotely.

(i) Describe a significant risk associated with the new claims administration system.

(ii) Propose strategies to manage the risk identified.
3. (12 points) In 2012, Dr. Dan opened an animal hospital in a small but growing town near a medium-sized city. Dr. Dan is the hospital’s only veterinarian and is not paid a salary. He started the business with a bank loan and is not competent with cash management of the business. The hospital has not yet earned a profit but is expected to become profitable in 2015. Dr. Dan expects he could sell the hospital for an amount equal to its outstanding debt.

Dr. Dan enjoys the freedom of being his own boss but struggles with the challenges of managing a business. For example, he has had trouble collecting money his clients owe him, and he acknowledges that he does not manage his employees effectively.

Dr. Dan has hired you as a personal advisor to conduct an independent analysis of the following three strategic options:

I. Continue his current business with no change.

II. Sell his hospital and become a staff veterinarian at another animal hospital.

III. Sell his hospital and take a loan to buy a franchise of a MegaPet animal hospital in the nearby city. MegaPet is a chain of animal hospitals housed exclusively inside a national chain of large pet stores.

You are provided the following simplified financial projections in thousands:

<table>
<thead>
<tr>
<th>Calendar Year</th>
<th>Option I</th>
<th>Option II</th>
<th>Option III</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gross Revenue</td>
<td>190</td>
<td>290</td>
<td>388</td>
</tr>
<tr>
<td>Client accounts written off</td>
<td>30</td>
<td>35</td>
<td>40</td>
</tr>
<tr>
<td>Net Revenue</td>
<td>160</td>
<td>255</td>
<td>348</td>
</tr>
<tr>
<td>Debt service</td>
<td>18</td>
<td>18</td>
<td>18</td>
</tr>
<tr>
<td>Fees to MegaPet</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Professional liability ins.</td>
<td>2</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Salaries/wages</td>
<td>75</td>
<td>125</td>
<td>220</td>
</tr>
<tr>
<td>Employee benefits</td>
<td>0</td>
<td>0</td>
<td>10</td>
</tr>
<tr>
<td>Other Expenses</td>
<td>35</td>
<td>45</td>
<td>55</td>
</tr>
<tr>
<td>Total Expenses</td>
<td>130</td>
<td>190</td>
<td>307</td>
</tr>
<tr>
<td>Net Income</td>
<td>30</td>
<td>65</td>
<td>41</td>
</tr>
</tbody>
</table>

You can ignore taxes in your analysis.
3. Continued

You are also provided with the following information regarding the three options:

Option I:
- Projections provide for adding one veterinarian to staff in 2017
- Employee benefits for 2017 are for the second veterinarian only
- Salaries/wages are for support staff in 2015 – 2017 plus the second veterinarian in 2017
- Dr. Dan does not pay himself a salary but receives the hospital’s net income each year

Option II:
- The net income represents the salary Dr. Dan receives as an employee

Option III:
- Projections provide for adding one veterinarian in 2016 and a second in 2017
- Dr. Dan does not receive a salary but receives the net income each year
- In addition to branding, MegaPet will:
  - Supply a state-of-the-art hospital administration computer system
  - Monitor the management reports generated by the administration system and communicate with Dr. Dan about potential problems
  - Provide standard policies and procedures that all their hospitals must follow (including requiring clients to pay for the cost of veterinary services at the time of service)
  - Supply training for all employees
  - Purchase most supplies in bulk and handle payments to suppliers
  - Require that employee benefits be made available to all hospital employees

(a) (3 points) Describe the following risks to Dr. Dan as they apply to Option I:

(i) Liquidity Risk

(ii) Counterparty Risk

(iii) Operational Risk

(iv) Professional Liability Risk (Legal obligations arising out of a professional's errors, negligent acts, or omissions during the course of the practice of his or her craft)

(b) (2 points) Explain how the risks described in (a) change if Dr. Dan elects to pursue Option II.

Question 3 continued on next page
3. Continued

(c) (2 points) Explain how the risks described in (a) change if Dr. Dan elects to pursue Option III.

As his advisor, you suggest that objective analysis of the risks should not be Dr. Dan’s only consideration.

(d) (2.5 points)

(i) Explain why, in the strategic risk management field, scenario analysis is adopted as a qualitative analytical tool, rather than as a quantitative tool.

(ii) Identify three qualitative factors that could influence Dr. Dan’s choice among the three options.

(e) (2.5 points) You do not intend to make a firm recommendation to Dr. Dan regarding his options; instead, you will offer guidance to help Dr. Dan make the decision that is best for him.

Outline the guidance you will offer Dr. Dan as he chooses among the three options.
4. **(5 points)** Cypress is a financial services company evaluating the economic performance of two of its operating units. You are provided the following:

<table>
<thead>
<tr>
<th></th>
<th>Unit A</th>
<th>Unit B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Income</td>
<td>26.1</td>
<td>30.8</td>
</tr>
<tr>
<td>Assets</td>
<td>1,000.0</td>
<td>1,100.0</td>
</tr>
<tr>
<td>Required Economic Capital</td>
<td>220.0</td>
<td>230.0</td>
</tr>
<tr>
<td>Available Economic Capital</td>
<td>225.0</td>
<td>275.0</td>
</tr>
<tr>
<td>Risk Adjustment to Net Income</td>
<td>9.5</td>
<td>13.2</td>
</tr>
</tbody>
</table>

Values are reported in $ millions.

(a) **(2 points)** Calculate the following measures of return for each unit:

(i) ROA

(ii) ROE

(iii) RAROC

(iv) RORAC

(v) RARORAC

Show your work.

(b) **(1 point)** Explain the benefits of using risk-adjusted return measures as compared to traditional measures.

(c) **(2 points)** The CFO of Cypress concludes from your calculations that unit B is underperforming based on the RAROC measure.

(i) Explain why the CFO may be most focused on the RAROC measure.

(ii) Provide arguments to counter the CFO’s conclusion that unit B is underperforming.
5. (10 points) Acme Corporation, a high tech firm, and Elliott, Inc., a traditional manufacturer of high-end furniture, each has outstanding zero coupon debt of $100 million maturing in three years. This is the only debt outstanding for each company.

You intend to use the Merton model to evaluate the debt.

The companies currently have the following characteristics:

<table>
<thead>
<tr>
<th></th>
<th>Assets</th>
<th>Expected Growth Rate</th>
<th>Volatility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acme</td>
<td>$175M</td>
<td>0.12</td>
<td>0.36</td>
</tr>
<tr>
<td>Elliott</td>
<td>$250M</td>
<td>0.04</td>
<td>0.29</td>
</tr>
</tbody>
</table>

(a) (2.5 points)

(i) Explain how the payoffs to Acme’s bondholders and stockholders can be viewed in terms of puts and calls.

(ii) Graph the payoffs to Acme’s stockholders as a function of the potential asset values at the end of year three. Label your graph.

(iii) Graph the payoffs to Acme’s bondholders as a function of the potential asset values at the end of year three. Label your graph.

(b) (2 points) Show that the probability of default at the end of year three using the Merton model is:

(i) 12.2% for Acme

(ii) 3.5% for Elliott.

(c) (0.5 points) First, assume that there is no dependence between the two companies.

Calculate the probability that both companies will default at the end of year three. Show your work.
5. Continued

(d) (5 points) Next, assume that the asset values at time 3 of the two companies are linked by a Clayton Copula with parameter $\alpha = 2$.

The Clayton Copula has a generalized function:

$$C_\alpha(F(x_1), F(x_2), \ldots, F(x_N)) = \left[\sum_{n=1}^{N} (F(x_n))^{-\alpha} - N + 1\right]^{-\frac{1}{\alpha}}$$

(i) Show that the probability that both companies will default at the end of year three using the Clayton Copula is 3.4%.

(ii) Explain why the maximum possible value for the probability that both companies will default at the end of year three is 3.5%.

(iii) State with reasons whether the Clayton Copula with parameter $\alpha = 2$ is an appropriate model for the joint probability functions for the two distributions in this case.
6. (11 points) Gaia Insurance is a life insurer that has historically sold life insurance and annuity contracts. Gaia has been measuring its economic capital for this business using a parametric VaR of its profits and losses (P&L). VaR is measured using a quarterly horizon with a 95% confidence level. The profits are assumed to be normally distributed with a quarterly mean profit of $5 million and a standard deviation of $8 million.

You have been asked to review alternative calculation methods for VaR.

The following table provides the worst ten ordered quarterly losses for Gaia over the last 100 quarters:

<table>
<thead>
<tr>
<th>Losses ($millions)</th>
<th>13.5</th>
<th>11.3</th>
<th>10.1</th>
<th>9.0</th>
<th>8.2</th>
<th>7.4</th>
<th>6.8</th>
<th>6.2</th>
<th>5.7</th>
<th>5.3</th>
</tr>
</thead>
</table>

(a) (1.5 points) Calculate the following risk metrics for Gaia’s life and annuity block at a 95% confidence level over a quarterly horizon:

(i) Parametric VaR

(ii) Empirical VaR

Show your work.

(b) (2 points) You recall the following standard error formulas:

\[
SE(\hat{q}) = \sqrt{\frac{c(1-c)}{Tf(q)^2}}
\]

\[
SE(\hat{\sigma}) = \sigma \sqrt{\frac{1}{2T}}
\]

Calculate a 95% confidence interval for each of the following risk metrics with respect to a sample of 100 observations that have an underlying Normal distribution:

(i) 95% Parametric VaR

(ii) 95% Empirical VaR

Show your work.

(c) (1.5 points) Assess whether the parametric or empirical VaR is the better approach for Gaia’s life and annuity block. Explain your conclusions using your analysis in (a) and (b).
6. Continued

Gaia recently acquired Kismah General, a property insurer.

You have constructed a distribution of annual P&L (in $millions) per $100 million earned premiums based on industry data that you will use to assess the risk exposure of Kismah General. The data has a mean profit of $30 million, a standard deviation of $30 million and the following annual loss tail:

<table>
<thead>
<tr>
<th>Percentile</th>
<th>1st</th>
<th>2nd</th>
<th>3rd</th>
<th>4th</th>
<th>5th</th>
<th>6th</th>
<th>7th</th>
<th>8th</th>
<th>9th</th>
<th>10th</th>
</tr>
</thead>
<tbody>
<tr>
<td>Losses</td>
<td>145</td>
<td>111</td>
<td>86</td>
<td>82</td>
<td>41</td>
<td>21</td>
<td>16</td>
<td>13</td>
<td>11</td>
<td>8</td>
</tr>
</tbody>
</table>

(d) (1 point) Calculate the following risk metrics for Kismah General over a one-year horizon and at a 98% confidence level:

(i) Parametric VaR, assuming losses are normally distributed

(ii) Empirical VaR

Show your work.

(e) (2 points)

(i) Plot the losses predicted by assuming a Normal ($30, 30^2$) distribution for the P&L of the Kismah General insurance block against the historical values at the following percentiles:

1. 90th
2. 95th
3. 99th

(ii) Interpret the results.

For the Kismah General insurance block, you also investigate the use of extreme value theory (EVT), fitting a two-parameter generalized Pareto distribution (GPD) to the tail of the historic loss data. The GPD has the following cumulative distribution function:

\[
F(x) = 1 - \left(1 + \frac{x - u}{\beta} \right)^{-\frac{1}{\xi}}
\]
6. Continued

Using a loss of $41 million as the threshold, beyond which 5% of the dataset remains, you determine that the maximum likelihood estimate of the shape parameter is 0.5 and of the scale parameter is $100.

Using the GPD for the tail losses, the estimated VaR at the \( c^{\text{th}} \) level of confidence is:

\[
\hat{\text{VaR}} = u + \left( \hat{\beta} / \hat{\xi} \right) \left[ \left( N / N_u \right) (1 - c) \right]^{-\hat{\xi} / \hat{\xi}} - 1
\]

(f) \( (1 \text{ point}) \) Calculate the 98\(^{\text{th}}\) percent quantile estimator of VaR using your fitted Generalized Pareto model. Show your work.

(g) \( (2 \text{ points}) \) Recommend the most appropriate method for estimating VaR from those computed in (d) and (f) to use for the Kismah General insurance block. Justify your choice with reference to specific results from your analysis.
7. (9 points) You are an actuary at Bunche Mutual. Bunche’s models are developed and maintained by the pricing actuaries. These models are then provided by the various pricing actuary teams to the corporate risk actuaries and converted for internal capital purposes. While the pricing actuaries have a strong sense of ownership over their models, they are not knowledgeable about the internal capital model results.

The corporate risk actuaries set capital using 90% CTE. Some of the assumptions in the Economic Capital (EC) model have not been changed since the model was developed five years ago.

You have been asked to validate the EC model based on the following three principles:

I. Model design and build need to be consistent with the model’s intended purpose

II. Ensure appropriateness of established model governance

III. Validate the model components

(a) (1.5 points) Describe potential areas of concern with model governance (Principle II) at Bunche.

(b) (2 points) You are validating the model parameters for the following risks:

(i) Pandemic Risk

(ii) Operational Risk

(iii) Expense Risk

Identify an appropriate estimation method for parameterizing each of the risks listed above. Explain your response.
7. **Continued**

Your manager tells you that the only assumptions you need to validate are mortality and lapse.

(c) *(2.5 points)* The mortality assumption currently used in the model was provided by a consultant five years ago and has not been updated since. There have been changes to the product designs and mix of business in the last five years.

(i) Identify key considerations that should be taken into account in updating Bunche’s mortality assumption.

(ii) Explain how to apply each of Principles I, II, and III to the mortality updating process.

(d) *(3 points)* Outline the process you would follow to determine if your manager’s focus on validating only the mortality and lapse assumptions in the EC model is appropriate.
Questions 8 and 9 pertain to the Case Study and/or extension readings. Each question should be answered independently.

8. (11 points) You have been asked by the Pension Committee to assist in enhancing the risk management processes of SLIC’s Defined Benefit Plan (the “Plan”). In an effort to focus on Plan surplus risk, you are going to adjust the current Strategic Asset Allocation process to incorporate the liabilities and model them as a portfolio of bonds.

(a) (1.5 points) Your intuitive approach to modeling SLIC’s DB Plan liabilities is reflected in the following expression for the excess return on liabilities:

\[ R_L - R_f = \beta (R_B - R_f) + \varepsilon \]

Explain to the Pension Committee how each of the terms \( R_B, \varepsilon, \) and \( \beta \) contribute to modelling the Plan liabilities effectively.

(b) (2 points) In order to assess an appropriate risk budget for surplus volatility, you adopt a risk/reward framework that defines a static risk-adjusted change in surplus (RACS) metric over a 1-year horizon:

\[ \text{RACS}_t = \frac{E_t \left[ S_{t+1} - S_t (1 + R_f) \right]}{\sigma_t \left[ S_{t+1} \right]}, \text{ where } S_t \text{ equals } A_t - L_t \]

Demonstrate that RACS is analogous to the Sharpe ratio.

To analyze the current state, you have gathered the following information:

<table>
<thead>
<tr>
<th>Index</th>
<th>Benchmark Asset Allocation</th>
<th>Volatility</th>
<th>Excess Return</th>
<th>S&amp;P 500</th>
<th>MSCI EAFE</th>
<th>Barclay’s Aggregate Bond</th>
</tr>
</thead>
<tbody>
<tr>
<td>S&amp;P 500</td>
<td>45%</td>
<td>15.05%</td>
<td>2.22%</td>
<td>2.27%</td>
<td>2.01%</td>
<td>0.03%</td>
</tr>
<tr>
<td>MSCI EAFE</td>
<td>20%</td>
<td>16.88%</td>
<td>1.60%</td>
<td>2.01%</td>
<td>2.85%</td>
<td>0.03%</td>
</tr>
<tr>
<td>Barclay’s Aggregate Bond</td>
<td>35%</td>
<td>3.73%</td>
<td>0.26%</td>
<td>0.03%</td>
<td>0.03%</td>
<td>0.14%</td>
</tr>
</tbody>
</table>
8. Continued

The Plan liability of $736 million will be modeled using Barclay’s Long Government & Credit (LG&C) bond index, which has a correlation coefficient of 0.62 with the Plan’s Benchmark asset portfolio and the following characteristics:

<table>
<thead>
<tr>
<th>Index</th>
<th>Volatility</th>
<th>Excess Return</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barclay’s LG&amp;C</td>
<td>7.10%</td>
<td>0.50%</td>
<td>10.20</td>
</tr>
</tbody>
</table>

The liability noise term has a mean return of 0 and a volatility of 2%.

(c) \(2\) points Calculate the following values for the Plan’s Passive Benchmark asset portfolio:

(i) Expected asset portfolio excess return

(ii) Volatility of the asset portfolio return

(iii) Sharpe Ratio

Show your work.

(d) \(2\) points Calculate the following values for the Plan liability portfolio:

(i) Expected liability portfolio excess return

(ii) Volatility of the liability portfolio

Show your work.

(e) \(2.5\) points Given Plan assets of $644 million and Plan liabilities of $736 million, calculate the following values:

(i) Expected dollar excess return on surplus

(ii) Volatility of \(S_1\)

(iii) \(RACS_0\)

Show your work.

(f) \(1\) point Interpret your RACS metric result relative to the Sharpe ratio of the Plan assets for the Pension Committee.
9. (9 points) SLIC’s Chief Investment Officer, Bill, is seeking approval from the VP of HR, Mary, for his proposed changes to the investment strategy of SLIC’s Defined Benefit Pension Plan (the “Plan”).

Bill notes that one of the Plan’s external U.S. Fixed Income managers has been underperforming its benchmarks for the last several quarters. Bill wants Mary to immediately move the funds and the management of these Plan assets over to the Fixed Income team at SLIC. This team has consistently outperformed its benchmarks over this same time period. Bill also notes that such an approach would result in investment management fees being retained within the SLIC family.

Bill recently hired a star manager from a defunct hedge fund who has expertise with a Long/Short U.S. Equity strategy. Bill claims, “The expected returns of this strategy are easily double what the Plan has been earning in the U.S. stock market.” Bill suggests that Mary re-allocate 10% of the Plan’s assets currently allocated to U.S. Equity to seed this new hedge fund strategy for SLIC. Bill asserts, “This will certainly help close the Plan’s funding gap in short order.”

Furthermore, Bill urges Mary to propose a new Statement of Investment Policy and Procedures (SIP&P) to the Board in order to effect these changes as soon as possible. Bill declares, “A narrow window in the market has opened up at this time to make this a highly opportune trade for the Plan. We cannot wait for a new CFO to be appointed and brought up to speed.”

You are an investment actuary at SLIC. Mary has asked for your advice on the governance aspects of Bill’s requests.
9. Continued

In your review, you have identified six key elements related to governance that should be detailed in the SIP&P. Five of these elements are:

I. Specification of who is responsible for:

(i) determining investment policy,

(ii) executing investment policy, and

(iii) monitoring the results of implementation of the policy.

II. A description of the process for reviewing and updating the SIP&P.

III. A description of the responsibility for engaging and discharging external advisors.

IV. A description of the roles and responsibilities of boards and staff.

V. Assignment of responsibility for the determination of asset allocation, including inputs used and criteria for development of input assumptions.

(a) (5 points) Select any three of the five key governance elements listed above, and for each of the three:

(i) Identify requirements in the Plan’s current Statement of Funding Policies and Procedures and SIP&P that apply to the given governance element.

(ii) Identify one of Bill’s recommendations that should be addressed by the specific governance element, and assess whether that recommendation would violate the Plan’s current policies on governance.

(b) (2 points)

(i) Identify and explain a sixth key governance element that is not on the list above.

(ii) Propose a new statement to be added to the SIP&P that would rectify this shortcoming in the Plan’s governance.

(c) (2 points) Recommend a new organizational structure defining roles and responsibilities for investing the Plan’s assets. Justify your recommendation.