VM-22 Subgroup Discussion Topics

Remaining Tier 2 Comments

- Allow SPIAs to be optional without exclusion test? (page 14)
  - ACLI comments

- Allow PRT to undergo certification method (rather than being ineligible) (page 33)
  - ACLI comments

- Exclusion Test Grouping (page 14)
  - Group with risks with significantly different profiles?
  - Same grouping as general PBR modeling or not?
    - ACLI comments
    - TDI comments

- Denominator for SERT (page 34)
  - Only benefits are also future premiums?
  - ACLI comments
  - TDI comments

- Deterministic Exclusion Test Criteria (page 38)
  - Does the company need to A) only disclose or B) pass the results of the 16 scenarios from the exclusion ratio test to be eligible for the deterministic reserve?
  - TDI comments

- Reinsurance Modeling (page 29)
  - Reflect contractual/other characteristics for considering reinsurance modeling?
  - TDI comments

- Include fair value certification? (page 45)
  - CA OPBR comments
  - TDI comments

- Permit PRT mortality with no or less than full credibility to follow a table from a third-party data provider instead of an industry table if available? (pages 58 & 60)
  - ACLI comments

- Allocation: method 1 or 2? (page 67)
  - ACLI comments

- Floor for contracts without cash surrender value (pages 21-22)
  - Working reserve concept, similar to a requirement in VM-21?
  - Include a floor for the deterministic-type reserve concept?
  - Academy comments
- TDI comments
  - Reserving category for deferred annuities with depleted fund value
    - Payout or accumulation reserving category?