**Life Actuarial (A) Task Force/ Health Actuarial (B) Task Force**

**Amendment Proposal Form**

1. Identify yourself, your affiliation and a very brief description (title) of the issue.

Staff of Office of Principle-Based Reserving, California Department of Insurance – Address the topic of prescribed templates.

1. Identify the document, including the date if the document is “released for comment,” and the location in the document where the amendment is proposed:

Valuation Manual (January 1, 2019 edition), Introduction, Section I, A.1

1. Show what changes are needed by providing a red-line version of the original verbiage with deletions and identify the verbiage to be deleted, inserted or changed by providing a red-line (turn on “track changes” in Word®) version of the verbiage. (You may do this through an attachment.)

See attached Appendix.

1. State the reason for the proposed amendment? (You may do this through an attachment.)

See attached Appendix.

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NAIC Staff Comments:

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| --- | --- | --- | --- |
| **Dates:** Received | Reviewed by Staff | Distributed | Considered |
|  |  |  |  |
| APF 2019-58 (CA APF DN) | | | |

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#### Appendix

#### ISSUE:

Now that the concept of a prescribed template has been introduced into VM-31, it should be made clear what the rules are surrounding making changes to such templates.

#### SECTIONS:

Introduction, Section I, Process for Updating the *Valuation Manual*, Section A.1

#### REDLINE:

1. Substantive Items

Substantive changes to the *Valuation Manual* are proposed amendments to the *Valuation Manual* that would change or alter the meaning, application or interpretation of a provision. All changes to the *Valuation Manual –* or to templates prescribed for use by the *Valuation Manual* *–* will be considered substantive, unless specifically identified as either a nonsubstantive item or an update to a table by simple majority vote of the Life Actuarial (A) Task Force/Health Actuarial (B) Task Force. Any item placed on the Active List as substantive will be exposed by the Life Actuarial (A) Task Force/Health Actuarial (B) Task Force for a public comment period commensurate with the length of the draft and the complexities of the issue, but for no less than 21 days. The comment period will be deemed to have begun when the draft has been placed on the appropriate public NAIC web page. The Life Actuarial (A) Task Force/Health Actuarial (B) Task Force will hold at least one open meeting (in person or via conference call) to consider comments before holding a final vote on any substantive items. Subsequent exposures of substantive items will be for a minimum of seven days. Meeting notices for Life Actuarial (A) Task Force/Health Actuarial (B) Task Force meetings will indicate if a vote is anticipated on any substantive items. Adoption of all changes at the Life Actuarial (A) Task Force/Health Actuarial (B) Task Force will be by simple majority.

#### REASONING:

Help assure readers that there no back doors through which to create new requirements.