PBR: Is it almost 2019 already?!? How ready are you for PBR?

Ben Farnsworth, KPMG LLP Reanna Nicholsen, New York Life

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- **Do not** discuss what you or other entities plan to do in a particular geographic or product markets or with particular customers.
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- **Do** leave a meeting where any anticompetitive pricing or market allocation discussion occurs.
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Biographies – Ben Farnsworth

Ben Farnsworth, FSA, CERA, MAAA, CFA Director, KPMG LLP

Ben Farnsworth is a Director in KPMG's Risk Analytics practice with over 15 years' experience in the life insurance industry. His current areas of focus include financial transformation, business analytics, model validation and risk analysis, and actuarial audits.

He is a Fellow of the Society of Actuaries, Member of the American Academy of Actuaries and CFA charter holder.

Biographies – Reanna Nicholsen

Reanna Nicholsen, FSA, MAAA Corporate Vice President & Actuary, New York Life Insurance Company

Reanna Nicholsen is a Corporate Vice President & Actuary for New York Life Insurance Company and is responsible for the implementation of Principle-Based Reserving. Reanna has worked within the New York Life departments of Financial Risk Management and Individual Annuity Product Pricing.

Reanna is a Fellow of the Society of Actuaries (FSA) and a Member of the American Academy of Actuaries (MAAA).

New York PBR Update



New York PBR

PBR is not yet adopted in New York State

PBR Bill approved by NY State Legislature

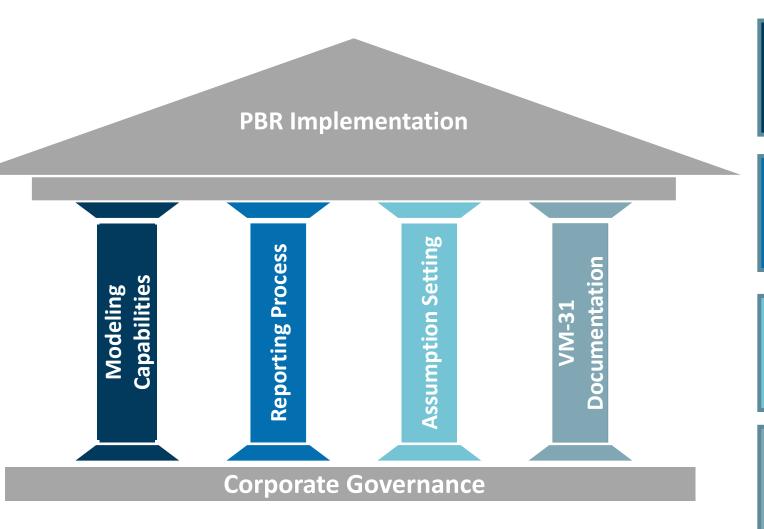
Bill has not yet been passed to the governor for approval

Once (and if) Bill is signed by the governor, NY DFS expected to share proposed PBR calculation

Implementation Strategy: What should we do in the next year?



Pillars of PBR Implementation



Modeling Capabilities

- -Upgrade models / request vendor assistance
- -Assess computing power
- -Consider modeling approximations

Reporting Process

- -Identify data sources
- -Set valuation timeline & consider lags
- -Establish reporting and rollforward process

Assumption Setting

- -Ensure compliance with PBR
- -Review assumption governance
- -Establish frequent experience studies

VM-31 Documentation

- -Draft documentation during implementation
- -Incorporate in valuation processes
- -Gather supporting documentation

PBR Resources

Academy PBR Toolkit

- Model Governance Checklist -> Governance and validation items covering 10 governance categories for companies to consider
- Model Governance Practice Note -> Practice note on models, model risks, and model governance
- Life PBR Practice Note -> Reviews PBR valuation practices in Q&A format

Academy PBA Projections Practice Note

- Reviews common projection methods
- Provides techniques for complexities, including starting assets and mortality grading
- Addresses Simplifications

PBR Assumptions Resource Manual

- Expected to be released in 2018
- Provides PBR assumption development framework and case studies

Beyond Valuation: Projecting PBR Reserves



Why project PBR reserves?

• Future PBR reserves needed for actuarial projections, including: financial planning & forecasting, product pricing, or ALM analysis

Based on actual PBR valuation

Income Statement
Premium Income
Investment Return
Total Revenue
Benefit Outgo
Expenses
Increase in Reserve
Total Expenses
Taxes
Net Income

Projected based on future values & assumptions

12/31/2019	12/31/2020	12/31/2021

Why are nested models needed to project PBR reserves?

 Nested models are needed to because assumptions will differ between actuarial projections (outer loops) and PBR valuations (inner loops), or may change over time.

Liability Assumptions

- Credibility
- Mortality improvement

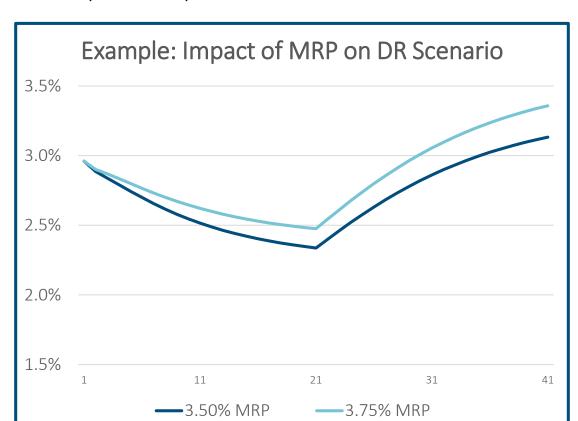
Asset Assumptions

- Interest and equity scenarios
- Corporate credit spreads
- Asset default cost rates

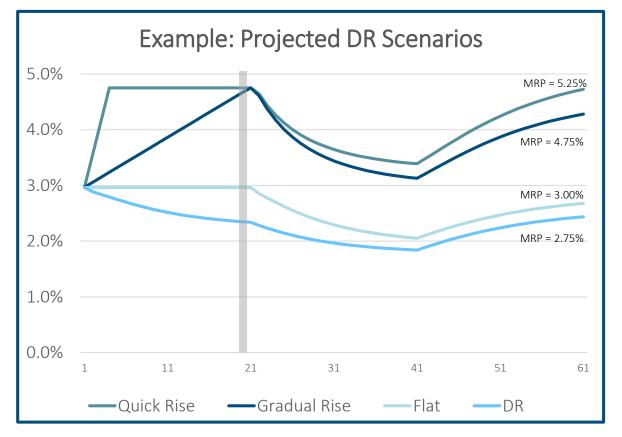
Example: Projected Interest Rates

Historical interest rates affect the mean reversion parameter and prescribed PBR scenarios

• 20-yr Treasury MRP fell from 3.75% to 3.50% in 2018



Projected outer loop scenario will drive PBR scenarios

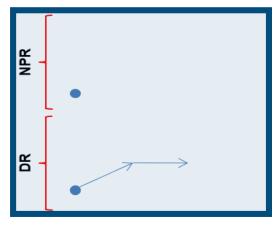


Using nested models to project PBR reserves

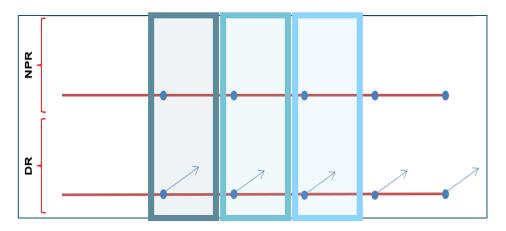
 Nested models are needed to project PBR reserves, since PBR cash flows will not be consistent with company best estimate cash flows.

Income Statement	12/31/2018
Increase in Reserve	Valuation Run





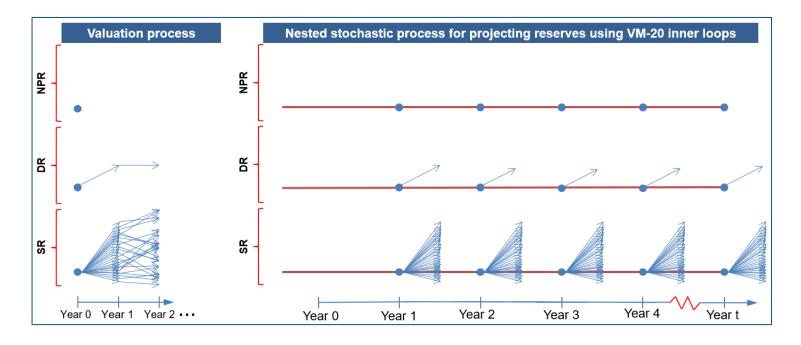
Point-in-time valuation



Inner Loop Projections

How to build nested models





Validation of nested models

Additional challenges to validate inner loop calculations

- Does modeling platform store all inner loop cash flows?
- Balance between minimizing stored output and transparency

Methods to validate

- Set up validation "outer loop" to validate results in future inner loops
- Establish key variables/output to store in inner loops to replicate results
- Sensitivity tests to confirm expected movements
- Confirm "counts" to ensure no lost policies, assets, or cash flows
- Establish controls similar to valuation for projected valuations as well

Projection Simplification Techniques

Proxy Estimate

- Use the NPR or Gross Premium Reserve to estimate DR / SR → Gross Premium Reserve provides economic proxy
- Project reserves at periodic nodes and interpolate in between

Asset Simplifications

- For a non-interest sensitive product, can model liability only to reduce run-time →
 May be helpful for iterative activities such as pricing
- Scenario reduction on either the outer loop or the inner loop

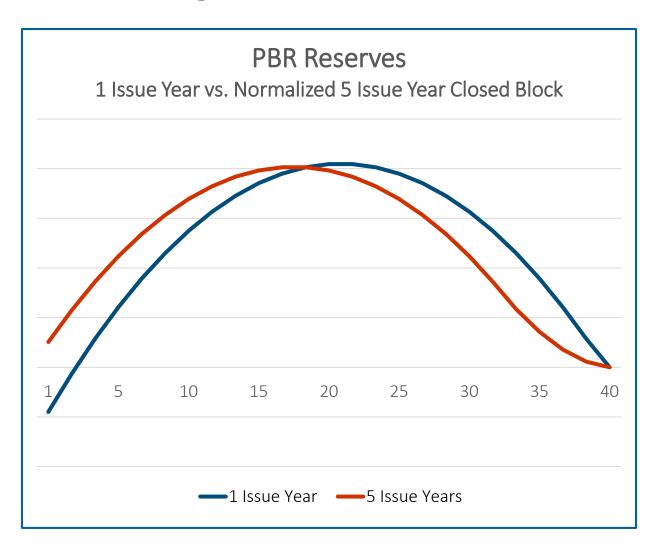
Investment Strategy Guardrail Demonstration

- Use a subset of population or a reduction in scenarios for the projection
- Compare average credit quality outside of the model rather than run model twice

Beyond Valuation: Pricing with PBR Reserves



Pricing Considerations



Periodically check which PBR component prevails

- Consider modeling dominant reserve, but tricky if components switch
- Note segments carrying largest impact (e.g. longer level periods on term)

Consider how many issue years to reflect

- Pricing single year of new business vs. cohort approach
- Product design changes will influence aggregate reserves over time

Cell-level pricing methods

- Model aggregate reserves
- Economic and run-time considerations

Industry Insights



Industry Survey Summary

Companies are faced with multiple new regulatory requirements and accounting change initiatives over the next few years. The respondents to the survey are primarily delaying adoption as long as possible with nearly 70% responding that they would adopt in 2019 or 2020.

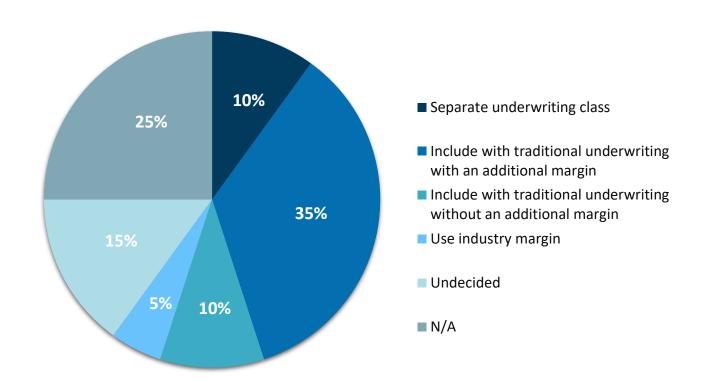
One of the original intentions of a principles based framework was to reduce reliance on reinsurance captives. However, the results of this survey indicate that companies are still evaluating their planned use of reinsurance. 25% of companies responded that they would stop using captives.

Explicit margins on liability assumption is a new concept for statutory reserving. The majority of companies state that a formal policy for setting margins is under development and that margins are primarily set using sensitivity testing rather than a more complex statistical technique.

A fully integrated asset-liability model increases the complexity of the valuation process. About half of the participants indicate they plan to use a single integrated model that projects assets and liabilities. However, over 80% of respondents plan to use the simplification of the 2% collar approach to setting starting assets rather than a direct iteration approach.

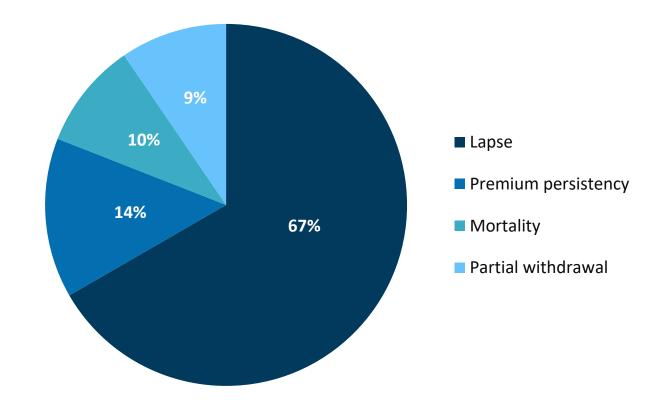
Plan to determine mortality credibility for policies issued under an accelerated underwriting framework

- Range of practices that companies plan to use
- Leading choice for accelerated underwriting is to include with traditional business with additional margin
- Anticipate this evolving as accelerated underwriting blocks grow and PBR processes evolve



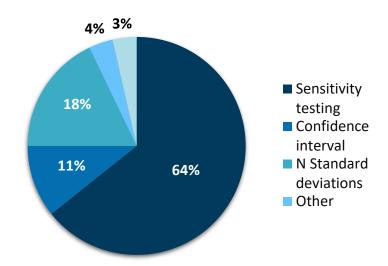
Dynamic liability assumptions for the stochastic reserve

- Majority plan to apply dynamic adjustments to lapse assumptions
- Consistent with principal based valuation for variable annuities
- Industry will need to monitor if additional dynamic multipliers are appropriate in the future



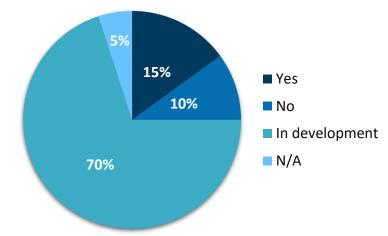
Method to determine margin on assumptions

 Margins will primarily be set using sensitivity testing initially rather than a more complex statistical technique



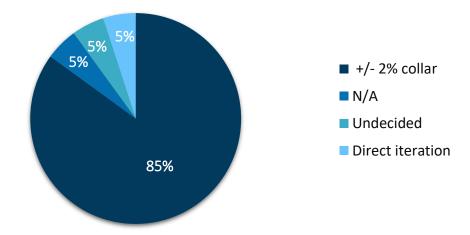
Is there a formal policy in place for setting margins?

- Majority responded that the policy was in development.
- Opportunity to develop a governance structure that represents leading practices and complies with the guidance in VM-31.



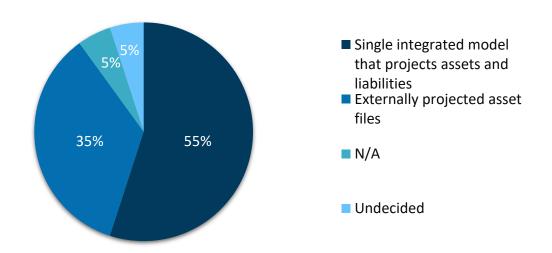
Approach to set starting assets

 Over 80% of respondents plan to use the simplification of the 2% collar approach to setting starting assets rather than a direct iteration approach



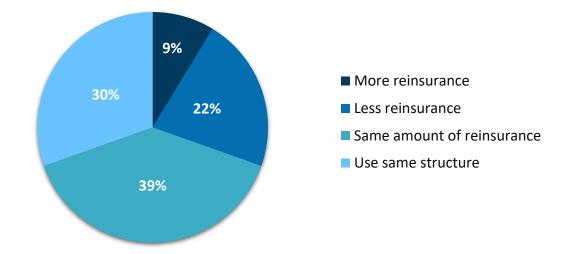
Plan to model assets under PBR

- About half of the participants indicated they plan to use a single integrated model that projects assets and liabilities.
- Fully integrated asset-liability model increases the complexity of the valuation process.



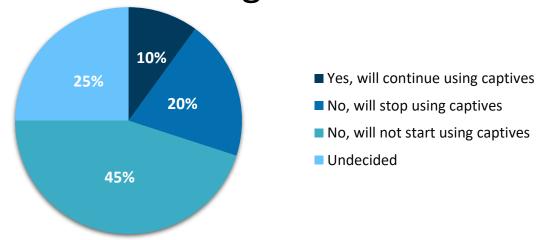
How is reinsurance expected to change under PBR?

- Nearly 70% of survey respondents are not expecting reinsurance to be changed under PBR
- Most plan to have either the same amount of reinsurance or use the same structure

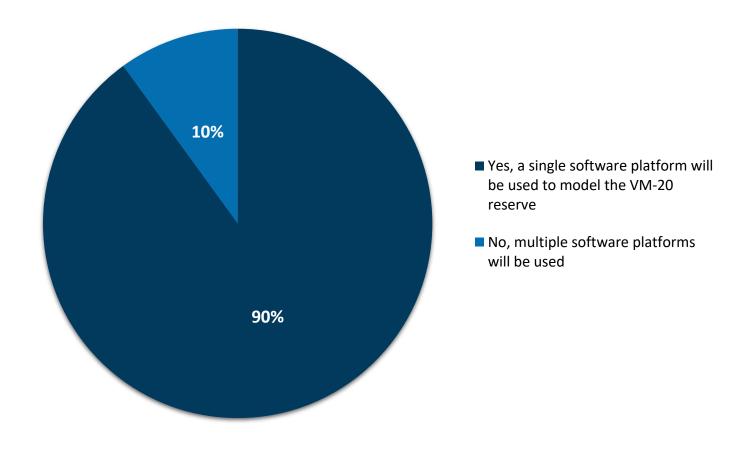


Is financial/captive reinsurance expected to change with PBR?

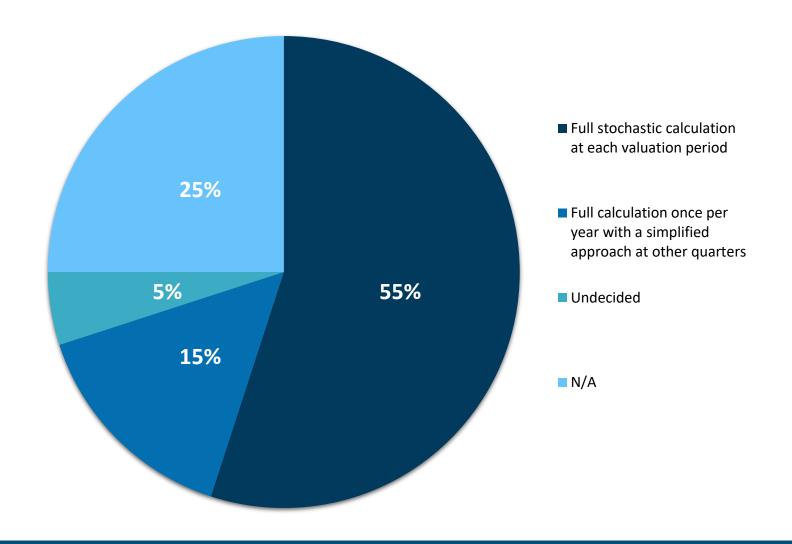
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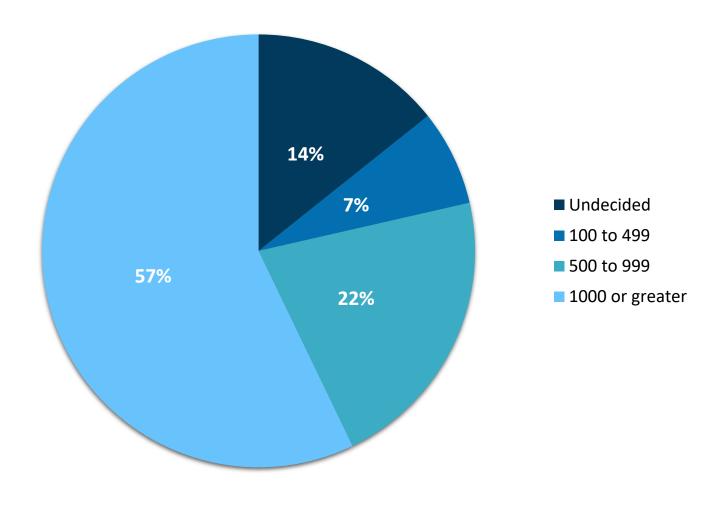
Will a single software platform be used for all components of the reserve?



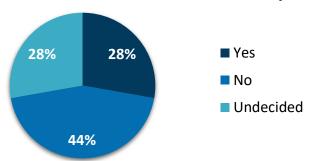
Approach for calculating the stochastic reserve



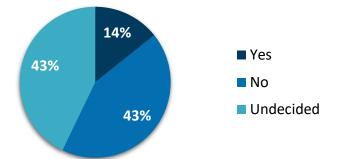
How many scenarios are planned to be used for the stochastic reserve?



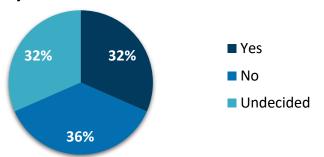
Modeling term conversions in deterministic and stochastic projections



Include whole life term riders that have not been refiled with CSO 2017 in PBR valuation



Modeling any riders with the base policy in the NPR calculation



Emerging Issues



Emerging Issues



Questions?

