

Draft Educational Note

Valuation of Universal Life Policy Liabilities

Committee on Life Insurance Financial Reporting

November 2006

Document 206148

Ce document est disponible en français
© 2006 Canadian Institute of Actuaries

Educational Notes do not constitute standards of practice. They are intended to assist actuaries in applying standards of practice in respect of specific matters. Responsibility for the manner of application of standards in specific circumstances remains that of the member in the Life Insurance Practice Area.

Memorandum

To: Members in the Life Insurance Practice Area
From: Tyrone G. Faulds, Chairperson
Committee on Life Insurance Financial Reporting
Date: November 30, 2006
Subject: Draft Educational Note – Valuation of Universal Life Policy Liabilities

The Committee on Life Insurance Financial Reporting (CLIFR) has developed the attached Educational Note – Valuation of Universal Life Policy Liabilities. This educational note presents considerations and examples of the application of the Standards of Practice (SOP) to the valuation of Universal Life (UL) policy liabilities in Canadian financial statements prepared in accordance with Generally Accepted Accounting Principles (GAAP).

CLIFR is currently reviewing the SOP sections 1700 and 2300 in connection with the wording of section 6 of this educational note. This section deals with the provisions for income taxes and other taxes not related to income. In providing for these taxes, the actuary is reminded of paragraph 2340.15 of SOP, which says that “The best estimate would be for continuation of the tax regime at the balance sheet date, except that the best estimate should anticipate a definitive or virtually definitive decision to change that regime. The margin for adverse deviations would be zero.” However, the actuary would also consider the CIA educational note “Future Income and Alternative Taxes” published in 2002, which advises that “where beneficial differences (permanent or temporary) rely on a favourable tax interpretation, the actuary would consider the risk of an adverse interpretation by tax authorities (potential “limited shelf life”)”.

An example of such a situation is with the use of unit trusts (e.g., Exchange Traded Funds) as an alternative to investing directly in equities to match policyholders’ account balances. Unit trusts are funds that track or replicate a specific index and are listed on major Canadian and US stock exchanges just like individual equities, but that have a materially different (and beneficial) tax treatment under current Canadian tax law than direct investments in equities. An interpretation of the SOP would suggest that this favourable tax treatment be projected to continue forever. Notwithstanding this, CLIFR’s view is that this tax treatment may have a potentially limited shelf life, and that the actuary would consider assuming that this benefit does not continue forever. (For example, the actuary might assume that favourable tax treatment persists for a limited period of time such as 5 to 10 years).

CLIFR is likely to recommend changes to the CIA SOP to address this and related tax issues.

The guidance in this educational note represents a majority view of members of CLIFR with respect to appropriate practice consistent with the SOP. This educational note has met the requirements of Due Process for Approval of Practice-Related Material other than Standards of Practice. However, in accordance with paragraph 1220.04 of the SOP, this note is “not binding.” It received final approval for distribution by the Practice Council on November 29, 2006.

As outlined in subsection 1220 of the SOP, the “*actuary should be familiar with relevant educational notes and other designated educational material,*” considering that a practice described “*for a situation is not necessarily the only accepted practice for that situation and is not necessarily accepted actuarial practice for a different situation.*”

I would like to thank the members of CLIFR who were primarily responsible for the development of this draft educational note: Ralph Ovsec, Hélène Pouliot, Les Rehbeli, Nazir Valani and Anne Vincent.

TGF

TABLE OF CONTENTS

1. INTRODUCTION.....	6
2. VALUATION METHOD.....	6
2.1 General Approach to Valuation	6
2.2 Term of the Liability	6
2.3 Needed Assumptions	7
2.4 Policyholder Reasonable Expectations	7
2.5 Policyholder Behaviour	8
2.6 Projected Cash Flows.....	9
2.7 Modelled Cash Flows	9
2.8 Approximate Methods	9
3. ECONOMIC ASSUMPTIONS.....	9
3.1 General.....	9
3.2 Scenario Testing: Interest Rate Risk.....	11
3.3 Scenario Testing: Non-Fixed Income Assets.....	11
3.3.1 <i>Risks Related to Investment in Equity</i>	11
3.4 Considerations for Investments Backing Policyholders' Fund.....	13
3.4.1 <i>Non-Fixed Income Assets: Investment Returns</i>	14
3.5 Considerations for Investments Backing Insurance Component	14
3.6 Inflation.....	14
4. NON-ECONOMIC ASSUMPTIONS.....	14
4.1 Mortality Assumption	14
4.2 Expense Assumption.....	15
4.3 Policy Lapse Assumption	15
4.4 Expected Premium and Partial Withdrawal Assumptions	17
4.5 Transfer of Funds and Premium Deposit Allocation Assumptions	18
5. POLICY COMPONENTS RELATED TO EXPECTED ASSUMPTIONS	19
5.1 Policyholders' Credited Rate	20
5.2 Cost of Insurance (COI) Charges.....	21
5.3 Expense Charges and Premium Loadings.....	21
6. TAX CONSIDERATIONS.....	21
6.1 Canadian Investment Income Tax (IIT).....	22
6.2 Canadian Tax Treatment of Unit Trusts (e.g., Exchange Traded Funds).....	22
6.3 Foreign Withholding Tax.....	23
6.4 Exempt Status	23
7. MARGINS FOR ADVERSE DEVIATIONS (MFADS)	24
7.1 Interest Rate Risk	24
7.2 Mortality Assumption	24
7.3 Policy Lapse Assumption	25

7.4	Expected Premium and Partial Withdrawal Assumptions	25
7.5	Transfer of Funds and Premium Deposit Allocation Assumptions	25
7.6	Policy Components	26
7.7	Equity Returns	26
7.8	Aggregate Provisions for Adverse Deviations (PfADs)	26
APPENDIX A – SAMPLE UL VALUATION PROCESS		27
APPENDIX B – APPLICATION OF CALM		29

1. INTRODUCTION

This educational note presents considerations and examples of the application of the Standards of Practice (SOP) to the valuation of Universal Life (UL) policy liabilities for Canadian financial statements prepared in accordance with Generally Accepted Accounting Principles (GAAP).

Universal Life (UL) is the generic name given to a plan of insurance where premiums are deposited into one or more funds and charges for insurance and expenses are deducted from these funds. The timing of premium payments may be fixed or variable and is not necessarily related to the timing of the deduction of insurance and expense charges.

2. VALUATION METHOD

2.1 General Approach to Valuation

The Canadian Asset Liability Method (CALM) of valuation combines the projected liability cash flows and the projected asset cash flows for the policies being valued to calculate a liability in the aggregate for those policies. This section provides guidance on the application of CALM with respect to some elements that are particular or important to the valuation of UL. The appendix illustrates a step-by-step approach that could be followed in calculating the policy liabilities.

The valuation of UL can be particularly complex because it may involve a significant amount of interest scenario testing and because of the possible inter-relationship of some assumptions with policy components.

The degree of risk transfer allowed for in the design of UL is important to the valuation. At one extreme, a UL policy could transfer no risk to the policyholder and be similar, for valuation purposes, to a fully guaranteed non-participating policy. At the other extreme, it could transfer all of the risk to the policyholder and be similar, for valuation purposes, to a traditional participating policy. Most UL policies will fall somewhere between these two extremes.

This paper covers the whole range of possible factors and considerations for valuing UL, some of which will be extremely important to a particular UL segment being valued and some of which will not. The valuation planning process for UL is particularly important (i.e., identifying issues and priorities correctly and concentrating on these facets of the valuation in designing the valuation practice). The appendices describe possible processes for developing the valuation of a UL product, many of the steps of which apply to all valuations but some of which are particularly important or unique to UL. Whether or not this step-by-step process is followed, the key is to develop the methodology and process carefully focusing on the material elements that create the most risk/exposure for the company. The segmentation of UL into relatively homogeneous sub-segments is a particularly important judgment-based decision that would be supported by appropriate scenario testing and analysis.

2.2 Term of the Liability

The term of a UL policy liability is the maturity date of the contract unless, in the opinion of the actuary, the contract is substantially a deferred annuity or deposit contract rather

than a life insurance contract. Examples of deposit contracts would include single premium contracts or highly funded contracts with minimal insurance. In these cases, the term of the liability, as stated in paragraph 2320.22 of the Standards, is determined as for a deferred annuity or deposit contract.

2.3 Needed Assumptions

In addition to the economic and non-economic actuarial assumptions, the actuary makes an assumption, for valuation purposes, about each projected variable policy component. It is important to identify and understand all variable elements that require assumptions. Specific considerations for setting these assumptions are described in sections 4 and 5 below.

Generally, the actuary would consider, in addition to Company and Industry experience, policyholder reasonable expectations, policy pass-through features and policyholder behaviour. The actuary would use sensitivity testing to understand which assumptions are most significant and to try to understand the inter-relationships of the various assumptions and policy elements, including interest rates.

Each assumption requires a Margin for Adverse Deviations (MfAD). Considerations for determining MfADs, specific to UL, are described in section 7 below.

Due to the interrelationship of many of the assumptions, the actuary would choose assumptions that are appropriate in the aggregate such that the resulting aggregate provision for adverse deviations (PfAD) is also appropriate.

2.4 Policyholder Reasonable Expectations

The application of the CALM to UL policies has many elements in common with its application to participating insurance or to adjustable nonparticipating contracts. An important concept in the valuation of such policies is that the liabilities make a provision for the policyholders' reasonable expectations with respect to guaranteed benefits, non-guaranteed benefits, premiums, charges, and credited rates.¹

When the policy elements are fixed by contract, the actuary need only consider whether representations, sales or administrative practices may have created policyholder reasonable expectations that augment the insurer's contractual obligations. When policy elements are not fixed, several factors may serve as a guide to the actuary in selecting the assumed policy elements. One is to consider the insurer's policy, if any, for the adjustment of policy elements. Another is to consider the insurer's past practice with respect to adjusting policy elements. The actuary would also consider what representations and communications (e.g., the sales policy illustrations) have been made to policyholders with respect to the adjustment of those policy elements.

If the insurer makes a change that would alter policyholder reasonable expectations, the actuary would consider whether or not the change was appropriately communicated to policyholders before reflecting it in his valuation. If the insurer decides to change the way it sets non-guaranteed factors of the policy in favour of the policyholders (i.e., improves the policy's performance), this will be readily accepted by policyholders and would be fully reflected in the valuation, resulting in an increase in liabilities. The same is not

¹ Additional guidance on policyholders' reasonable expectations can be found in paragraphs 2320.28 to 2320.34 of the Standards.

necessarily true in the converse situation and the actuary would apply judgment before reducing liabilities.

If there are deviations from its past practice or policy in the insurer's current practice with respect to adjusting policy elements, the actuary would inquire as to whether the insurer plans to restore practice consistent with its policy. If so, the actuary would set assumed policy elements that reflect management's plan, including the time that will be required to implement it. If not, the actuary would consider whether expectations reasonably have been created that the insurer has, in fact, modified its policy, and, if so, how, and would set the policy elements accordingly.

2.5 Policyholder Behaviour

Some UL policies offer great flexibility to their policyholders and, as a result, various elements of UL policies may be chosen or modified by the policyholders subject to the limitations of the contracts. Examples of such flexible features include amount of premium and frequency of payments, increase and decrease in face amount levels, selection of policy fund accounts, transfer of funds between accounts, and partial withdrawals. The actuary considers the extent to which these flexible elements affect the valuation. For example, if all investment options produce the same spread for the insurer, then assumptions such as fund transfers or asset mix become less important, unless there are significant minimum guarantees. This is discussed in more detail below in section 4.5.

In applying the CALM, the actuary considers the flexible elements of the product and takes them into consideration in the valuation. Policyholder behaviour may be reflected explicitly as a separate assumption (e.g., premium persistency), as an addition to an existing assumption (e.g., partial withdrawal included in withdrawal assumption) or implicitly (e.g. use of more conservative assumptions).

Consistent with policyholder reasonable expectations, choices that are currently available to the policyholders would generally be assumed to be available in the future. The actuary would be careful, however, in assuming that current behaviour is indicative of long-term behaviour.

When setting assumptions affected by policyholder behaviour, the actuary would assume that policyholders generally act in their best interests unless evidence exists to the contrary. This is not necessarily the same action or behaviour that most negatively impacts the insurer. It may also, in certain situations, be appropriate to assume some inertia from the policyholders because not all policyholders have the knowledge or the motivation to react appropriately in their own favour. Some examples of policyholder behaviour considerations are provided in section 4.

The actuary would use the best estimate assumption, revised from time to time with any supporting evidence. Where possible, the actuary would use historical experience to set the assumption, and would apply judgment where such experience is not available. The actuary would test the sensitivity of the liability to changes in these assumptions and use this sensitivity as a guide to establish an appropriate MfAD. In general, circumstances where there is less certainty would lead to the use of larger MfADs.

In selecting assumptions affected by policyholder actions, a reasonable grouping of policies could be made. The grouping would apply to products with similar policyholder

behaviour. Considerations to take into account when grouping policies can be found in the educational note titled, “Aggregation and Allocation of Policy Liabilities.”

2.6 Projected Cash Flows

Projection of UL policy features may be complex (e.g., several investment accounts, flexible premiums, bonuses and options). The actuary would be familiar with all policy features and would test that the valuation system accurately reflects them in the projected cash flows. The actuary would also test that the projected cash flows adequately reflect the impact of the different interest scenarios and related changes to assumptions and policy components.

2.7 Modelled Cash Flows

The actuary may choose to use a model office approach instead of a policy-by-policy calculation for a number of reasons (such as complexity of the product or limitations on available resources). The use of a model does not change the underlying valuation process and calculation approach.

Care would be taken such that the model office approach would give results that do not differ materially from the policy-by-policy approach. Therefore, the construction of the model would take into account any policyholder behaviour and expectations (e.g., lapse rates on minimally funded policies vs. lapse rates on maximally funded policies) that would materially affect the amount of the liability. The actuary would also take care where product features such as bonus interest credits that are contingent on the amount of premiums paid or the size of the policyholder funds may result in a material difference in the amount of the liability when modelled as compared to policy-by-policy.²

2.8 Approximate Methods

The valuation of UL policies may be very complex because of the large number of assumptions required and the interrelationships among assumptions. As a result, many actuaries would choose to use approximate methods.

The actuary would justify the use of any approximation such that it would be appropriate and does not materially affect the amount of the policy liabilities. For UL, it is generally more difficult to justify the use of an approximation when there are material differences between experience and the reflection of that experience in policy components (i.e., if the policy does not pass through experience gains or losses, or does so in a limited way).

3. ECONOMIC ASSUMPTIONS

3.1 General

Expected assumptions for investments, asset defaults, reinvestment strategies, and inflation are required as they are for the valuation of any life insurance policy. This section sets out special considerations that need to be taken into account when determining the expected economic assumptions for UL policies under CALM.

² If a model assumes all policies are average funded, bonus interest credits dependent on fund size may not apply. If the actual in-force is made up of some maximum funded policies and some minimum funded policies, then it is quite likely that the maximum funded policies will make up most of the total policyholder funds and that they will receive the bonus interest credits.

Policyholder behaviour with respect to the investment account options under UL contracts may be complex to model. A UL portfolio may contain several types of investments. Policyholders often have a large selection of funds that they can choose to invest their policy funds. Crediting rates on equity funds are sometimes linked to an index. The assets backing these policy funds may be closely matched and new deposits follow current policyholders' current choices. The insurer may have a separate investment policy for the assets backing the insurance cash flows. Those two investment policies may be subject to different limits. For these reasons, the assets supporting the policy fund component are often kept separate from the assets supporting the insurance component. Other separations might be done (e.g., Level Cost of Insurance (LCOI) vs. Yearly Renewable Term (YRT) cost of insurance or some product features.)

If the policyholder controls the investment decisions (e.g., policyholder fund), the actuary would assume investment according to the expected policyholders' fund selection. If the insurer controls investment decisions (e.g., insurance component), the actuary would assume investment according to the insurer's investment policy.

Paragraph 2330.12 of the Standards states:

“For a prescribed scenario, if the net cash flow forecasted for a period is positive,...., the actuary may assume reinvestment in non-debt investments

not to exceed their proportion of investments at the balance sheet date if the insurer controls investment decisions and if such reinvestment is consistent with its investment policy, or

in the proportion expected to be selected by policyholders if policyholders control investment decisions.”

When using non-debt investments, the actuary would normally assume that the proportion of non-debt investments at each duration would be in accordance with the insurer's current investment policies (regardless of whether net cash flows for the period are positive or negative). The review would be performed without considering any business issued after the valuation date (new sales) even for a valuation done on a going concern basis as stipulated in paragraph 2130.02 of the Standards.

This may create a situation where the actuary needs to divest non-debt investments. This disinvestment is not limited to non-debt instruments acquired after the valuation date.

The actuary would pay particular attention to the following situations:

- The current investment position is not the same as the current investment policy;
- The overall investment limits may apply to more than one block of business for which separate CALM projections are done. The separate liability amounts may vary significantly over time and/or the maturity of the blocks may be very different, creating situations where it is more difficult to verify the application of the investment policy's limits;
- The investment policy may include limits that vary over time. As an example, an investment policy may assume that investment in non-debt investments may be 20% of the total asset portfolio but reduces to 0% if the cash flows are within a certain number of years of maturity.

3.2 Scenario Testing: Interest Rate Risk

Both deterministic and stochastic modeling to provide for interest rate risk can be used under CALM. In this educational note, an interest scenario refers to a scenario in both applications, unless otherwise noted.

Stochastic modeling is helpful in assessing exposure to certain risks, such as interest guarantees and bonuses linked to interest rates. For example, providing for an interest guarantee or a bonus in a deterministic application may not provide appropriately for these features. Typically an interest rate scenario would either always trigger the interest rate guarantee or never trigger it. In the presence of material interest rate guarantees or bonuses, the actuary would consider stochastic modeling to determine an appropriate provision. Unfortunately, the complexity of UL modeling may present challenges in the application of stochastic modeling. If stochastic modeling proves impractical, the actuary would, at a minimum, test additional scenarios that are appropriate to the circumstances.

Guidance on stochastic modeling can be found in other CIA publications, such as:

- Selection of Interest Rate Models (Educational Note released in December 2003);
- Use of Stochastic Techniques to Value Actuarial Liabilities under Canadian GAAP (Research Paper released in August 2001).

3.3 Scenario Testing: Non-Fixed Income Assets

In the presence of substantial equity investments supporting the policy liabilities (backing the policyholders' fund or the insurance component), the actuary may choose to determine the Provision for Adverse Deviations (PfAD) on non-fixed investment returns by scenario testing instead of by applying the methodology described in paragraph 2340.13 of the Standards. The actuary is reminded that the provision resulting from applying the methodology in paragraph 2340.13 constitutes a minimum provision if scenario testing is not employed.

If scenario testing for non-fixed income investment returns is used, the actuary would determine two sets of scenarios to be tested: interest rate scenarios and equity scenarios. Where a relationship can be demonstrated or plausibly postulated to exist between another assumption and the forecasted interest rates, it may be appropriate to take such a relationship into account in the cash flow projections. However, the actuary would be very careful when deciding to vary the non-fixed interest assumption with the interest rate scenarios. Although many believe that such a relationship between equity returns and interest rates exists, there is little guidance on the subject at the moment.

If a relationship between interest rates and equity returns is assumed, it would be good practice to test both interest rate scenarios and equity scenarios independently to understand the effect of the assumed relationship.

3.3.1 Risks Related to Investment in Equity

To identify the equity risk contained within the product properly, the actuary may consider the assets supporting the policyholders' fund separately from the assets supporting the insurance and expense cash flows. A further refinement is to model the cash flows that are related to equity risks (e.g., the equity fund, fee income and expenses that are proportional to the equity fund) separately from the other cash flows.

Following are some of the risk elements that actuaries would consider when valuing policies that are backed by equity investments.

Market Risk

Market risk is the risk that equity markets will move in a direction that is detrimental to the insurer. For instance, if an insurer were relying on the proceeds from a sale of equities to provide for cash flows that have to be met on a life insurance product, a fall in equity values would result in the insurer having to find resources from elsewhere to meet these cash flows.

Basis Risk

If an insurer issues a product that provides equity returns to policyholders (say, returns linked to the S&P 500 index), and matches this with a basket of assets designed to mimic the returns on the S&P 500 index, then it is possible that the asset returns will be different from those credited to policyholders. The difference will be either a profit or loss to the insurer.

To match appropriately, scale is often a consideration. For example, there may be minimum size requirements to purchase certain instruments. These types of constraints may result in lags which would add to the basis risk.

There will also be basis risk if a financial instrument is used to hedge, say, fee income where the financial instrument has returns different from the underlying funds.

The insurer may use financial futures to hedge liabilities to policyholders. The returns from a future may not be the same as the returns on the underlying asset. For instance, an insurer credits TSE 300 returns to policyholders and aims to meet this liability by investing in a TSE 300 future. The price at which the future is bought will not be the same as the current level of the index, and there is a further risk if the future is sold before it matures. The difference in returns made on the future and the underlying asset will depend on the prevailing level of interest rates and dividend income on the underlying assets at the time the future is bought or sold. A risk management strategy that depends on buying futures at a later date would consider the potential costs of hedging.

In some cases, the insurer may purchase options instead (for example, if a product has guaranteed the higher of, say, zero or the returns on the TSE 300). If the insurer intends to hedge using traded options, the potential costs of changes in market volatility and interest rates, as well as the possibility that an option may not be available at the required date (say, due to liquidity constraints), would be considered.

The actuary would also consider the risk that a particular traded derivative will not be available at a later date. For instance, the exchange may discontinue a particular series of options or futures.

Currency Risk

If foreign market index returns are credited to the policyholders' account, the insurer could be exposed to currency risk. The degree of currency risk depends on whether or not the return credited to the policyholders and the asset return earned by the insurer are of the same currency. Currency swaps may help hedge any currency risk.

The expected assumption for future currency exchange rates is prescribed in paragraph 2340.17 of the Standards. In addition, the actuary would establish a MfAD.

Counterparty Risk

Counterparty risk refers to the risk that a party to a financial transaction will not meet its contractual obligations.

Over-the-counter derivative contracts tend to exhibit greater counterparty risk than traditional fixed income securities. This is primarily due to the wide range of potential cash flows payable under such contracts (with the exception of exchange traded derivative securities such as relatively short-term futures and options). The counterparties are typically banks. Credit analysis for hedging instruments generally focuses on an actual default of the counterparty or a failure by the counterparty to honour its contractual obligations.

If the contracts are exchange traded, there is negligible counterparty risk. Exchange traded options are standardized and are available with adequate liquidity and variety but only for short durations.

Liquidity Risk

Liquidity risk arises when there is limited ability to hedge, close out, or sell a financial risk position. This risk refers to the inability to buy or sell assets quickly at a fair price. The risk may be more important if continuous asset re-balancing is needed as in the case of a dynamic hedging strategy.

Volatility Risk

Volatility is represented by the standard deviation of the total return of a stock or an index. Volatility risk is the risk associated with changes in volatility. Option prices are very sensitive to volatility. A hedging strategy that requires future purchases of options may be exposed to increased volatility risk.

Taxation

For valuation purposes, the actuary would assume that the current (or substantially enacted) tax environment and tax rates would persist into the future for all classes of assets and all classes of income (e.g., bond interest, dividends from stocks, and capital gains or losses).³ There is a risk that particular tax situations, especially those that are overly favourable to the insurer, may not continue indefinitely. This is discussed in more detail in section 6.

3.4 Considerations for Investments Backing Policyholders' Fund

Matching may be difficult when the GAAP liability is less than the amount of funds in the investment option (e.g., UL contracts with YRT cost of insurance (COI) charges). Unless the company accepts the mismatch position, inter-segment notes may be used to improve the overall matched position of the policyholders' fund and the insurer's assets.

Equity pass-through products are not immune to the need for special attention. On the contrary, these products often require special attention, particularly in the areas of policyholder behaviour and valuation of underlying assets (options).

³ Paragraph 2340.15 of the Standards.

3.4.1 Non-Fixed Income Assets: Investment Returns

The actuary would project the investment returns for the assets supporting the policyholder funds. Policyholders may have several funds from which to choose. The actuary might blend some or all of the equity-linked funds in setting the expected investment return assumption by making assumptions about policyholders' fund mix in future years. Alternatively, the actuary might model each equity fund separately and make explicit assumptions about fund transfers made by policyholders to achieve a target mix in future years. In this case, the actuary would make an assumption about the extent to which these funds are correlated.

Section 4.5 gives additional guidance on future policyholders' fund mix and fund transfer assumptions.

3.5 Considerations for Investments Backing Insurance Component

When the GAAP liability is less than the amount of funds in the investment option (e.g., UL contracts with YRT COI charges and minimal interest rate guarantees and the policyholder funds are matched with an equal amount of assets), the insurance funds are then backed by negative assets that are equivalent to the present value of future gains (e.g., mortality charges less mortality costs, expense charges less actual expenses, actual crediting spreads less actual expenses covered by spread, etc.).

A sizeable insurance component may build up for UL contracts with Level COI charges. The resulting insurance cash flows usually have a very long duration and could be supported by long-term fixed income assets or by non-fixed income assets. If the latter situation is assumed, the actuary would then consider the risks described in section 3.3.1 above. The prescribed scenario reinvestment assumption may limit the use of non-fixed income assets for valuation purposes.

3.6 Inflation

The SOP require that the inflation rate be related to the interest rate scenarios. In the case of UL policies, the inflation rate may have an effect on policyholder benefits such as death benefits and critical illness benefits linked to the Consumer Price Index (CPI).

4. NON-ECONOMIC ASSUMPTIONS

Expected assumptions for mortality, expenses, and policy lapse will be required as they would be for the valuation of any life insurance policy. This section is primarily concerned with the special features of UL policies that would be taken into account when setting the expected assumptions. For example, UL policies require a premium persistency assumption.

4.1 Mortality Assumption

Some UL policy designs create a possibility for anti-selection that is not usually found in other policy types.

The actuary would consider the possibility of anti-selection when policyholders treat the plan as a YRT policy, and pay the minimum amount of premium necessary to keep the contract in force. Evidence of this activity could require an assumption for anti-selection, particularly when combined with high lapse experience.

Usually, mortality studies of standard underwritten policies exclude mortality from extended term and reduced paid-up non-forfeiture options. (These are options under which policyholders stop making premium payments and instead use the existing cash value of the policy to pay for future premiums for a limited term or to buy a paid-up life policy for a reduced sum assured). The mortality under these options has generally been seen to be higher than mortality of similar policies issued at standard rates. Under UL policies, it may not be possible to separate the coverages that would fall under these non-forfeiture options. The actuary would judge the extent to which this might affect the overall mortality result of UL policies.

If the policy allows increases in the amount at risk without underwriting, the policyholders that elect the increased coverage might exhibit higher mortality than that of policies where no election is made. This may occur due to either an increase in coverage or by a partial withdrawal that does not result in a decrease in coverage. The actuary would judge the extent to which this anti-selection might affect the mortality assumption.

4.2 Expense Assumption

UL unit expense assumptions would usually be different from unit expense assumptions on traditional policies for a number of reasons. UL policies generally have additional complexities and policyholder options that require additional administrative effort. The actuary would consider the rate at which policyholder options (premium dump-ins, ad hoc requests to transfer funds between investment funds, changes in amount of insurance, in force illustration requests, etc.) might be exercised when selecting expense assumptions. Other additional expenses (such as exempt testing, annual (or more frequent) policyholder reporting, automatic policy modifications, etc.) would also be considered.

Investment expenses incurred on UL policies may also be different from those incurred on traditional policies due to the wider range of investment choices available to policyholders.

4.3 Policy Lapse Assumption

There are some considerations for lapses of UL policies that are not necessarily applicable to other policy types. Some of these considerations are as follows:

- Policy design features may influence policyholder behaviour, such as surrender charges, persistency bonuses and access to cash values without requiring a full policy surrender;
- Policyholder behaviour may be affected by the taxation aspects of the policy. For example, policies issued on a joint life last survivor basis for estate protection purposes would be expected to have very low lapse rates;
- Policyholder behaviour may also vary under different interest rate scenarios;
- How the policies are being marketed (e.g., maximally funded policies may be marketed as long-term investment contracts, while minimally funded level COI policies, may be marketed as term to 100);
- Form of agent compensation (e.g., commissions may be payable on premium deposits or on fund accumulations, which may provide different incentives to the agent).

The existence of heavy back-end surrender charges may create reluctance on the part of the policyholder to surrender the policy for a period of time. If the back-end surrender charges are severe enough, it may create a cash surrender value cliff, with lower than normal lapse rates prior to the end of the surrender charge period, followed by heaped lapse rates when the surrender charge scale ends. A persistency bonus may create a similar effect. For policies that have level COI charges and where the policyholder can access the cash value without surrendering the policy, the existence of cash values would likely result in partial cash surrenders instead of full policy surrenders.

Some UL policies have significant premium deposits in addition to the minimum premiums required for the continuation of the insurance. These policies may be attractive to the policyholder due to the ability to defer tax on investment income. The policy lapse rate may be affected by this ability to defer tax and by the reluctance to pay tax on surrender of the policy.

UL policies frequently exhibit some of the following characteristics:

- minimum funded policies;
- policies purchased for tax considerations;
- joint last to die;
- presence of persistency bonuses,

and may result in ultimate lapse rates similar to stand alone T-100 products. In these cases, the actuary would review the degree of lapse support within the UL portfolio and assess the applicability of the most recent CIA studies on lapse supported products and of the Lapse Experience under Universal Life Level COI policies.

If a projection of policyholder fund balances results in a zero balance, an assumption regarding the continuation of the policy beyond that point is required. For policies where there is little incentive for the policyholder to maintain the policy in force, a heaped lapse rate may occur at that point. In setting this assumption, the actuary would consider the potential for anti-selection. If an assumption that all policies lapse when the fund reaches zero does not produce a materially different result, then it would be appropriate to assume that all policies lapse at that point. For policies where there is an incentive to keep the policy in force (e.g., level COI policies), unless the actuary can justify otherwise, the actuary would normally assume that a heaped lapse rate would not occur and that the policyholder would pay sufficient premiums to avoid lapsing the policy due to insufficient funds.⁴

⁴ Many level COI policies allow the policyholder to access the cash value and keep the insurance in force. This means that the decision to keep a minimally funded level COI policy in force will most likely be similar to a decision about a term to 100 policy with no values. An argument for allowing heaped lapses at the point where funds reach zero is that the insurance may not be needed at that point and the policyholder may no longer want to pay for it. However, lapses prior to this time could be below the level expected for term to 100 policies, since no premium is required to pay the cost of insurance. In the absence of experience, it is difficult to determine the impact of these offsetting considerations. Due to the sensitivity of the lapse rate for many of these policies, significant diversity of practice could result if a heaped lapse assumption were permitted without justification based on experience.

Another aspect of the policy lapse rate is the relationship of the credited rate to external interest rates. For example, if an insurer is crediting interest based on portfolio rates, then the policy lapse rates would be sensitive to the external interest rate environment. In this case, the actuary would consider the possibility of higher policy lapses occurring if new money interest rates were to rise. For some policies, there may be a right to transfer funds into other funds. Instead of the policy lapsing in this situation, transferring funds may satisfy the policyholders' investment objectives.

If any of the funds are registered, then those funds will be matured by the latest retirement age. It may not be necessary to terminate the policy at that point if the plan design allows it to continue on a non-registered basis. For policies where there is an incentive to keep the policy in force (e.g., many level COI policies), unless the actuary can justify otherwise, the actuary would normally assume that no additional policy lapses will occur at maturity of the registered funds, if the plan design allows continuation of the policy.

4.4 Expected Premium and Partial Withdrawal Assumptions

An important assumption for the valuation of a UL policy is the future premium deposit assumption. The most sophisticated valuation would determine the situation for each policy individually. It is more likely that policies will be grouped for this assumption. The number of groupings will depend on how the product has been marketed or any other identifying characteristic.

UL policies have a variety of premium requirement features. Some of these features are as follows:

- No specific required premium is payable;
- Premiums are required between minimum and maximum premium ranges;
- Minimum premiums are required for a period of time and then no specific minimum premium is required thereafter;
- There is a specific required premium that must be paid and is guaranteed by the insurer not to change;
- There is a specific required premium that must be paid, but is adjustable by the insurer;
- Premium holidays; that is, a temporary stoppage of premiums.

No premium persistency assumption is necessary when there is a specific required premium payable. In other situations, a premium persistency assumption is needed, subject to the limitations specified in the policy design.

When premiums are flexible, the future premiums that are assumed may produce significant differences in liabilities for different assumptions. The initial premium assumption chosen would be consistent with the information available from the policy administration system. As a check, the actual premium received could be compared to the amount of premium that would have been generated by the future premium assumption applied to the prior period in-force policies. This analysis may be valuable in determining the appropriateness of the future premium assumption.

Low premium persistency rates could be expected if the following are present:

- Marketing material places emphasis on premium flexibility;
- Sales illustrations feature quick-pay premiums or policies are administered to target a specific paid-up date (which could lead to low premium persistency rates in later years);
- Presence of large lump sum premiums in the past;
- Interest rate crediting is based on portfolio rates and new money rates spike upwards.

High premium persistency rates could be expected if the following are present:

- Most business is paid by pre-authorized cheque;
- Marketing material places emphasis on credited interest rates, tax advantages and savings aspects of the plan prior to retirement;
- Interest rate crediting is based on portfolio rates and new money rates decrease;
- Presence of persistency bonuses.

Policyholder behaviour may be influenced by guarantees inherent in the product design. For example, the policy may have a No Lapse guarantee, under which the policy is guaranteed not to lapse under certain conditions, regardless of the policyholder account value. The actuary would be aware of the conditions necessary to bring such guarantees into effect and would consider that the policyholder will act consistently with these conditions.

Policyholder behaviour may be affected by the interest rate scenario. For example, the actuary would assume that, during the period when minimum interest rate guarantees are being credited and are above current market rates, the policyholders would tend to increase premium persistency.

Policyholder behaviour may also be affected by Exempt Testing under the current Canadian income tax rules, to the extent that a high funded policy accumulates a fund balance that fails the Exempt Testing limits. This is discussed further in section 6.4.

The partial withdrawal assumption may be as important as the premium persistency assumption since both affect the size of the fund balance for the policy. Considerations for choosing partial withdrawal assumptions are similar to the considerations for choosing premium persistency assumptions. In addition, the actuary would consider the impact of tax on disposition of proceeds and on death benefits for level face and indexed designs.

4.5 Transfer of Funds and Premium Deposit Allocation Assumptions

Some UL policies have multiple investment fund options and may allow transfers among investment funds. For some policies, material differences in investment spread may exist among the funds, especially when minimum credited rate guarantees exist on certain funds.

When material differences in net spread exist, assumptions for transfers among funds and for the allocation of future premium deposits among funds are likely to have a material

effect on the valuation. The actuary would test the sensitivity of the liability to these assumptions in this situation, using one or more scenarios as appropriate.

It would be appropriate to base the expected premium deposit allocation assumption on actual experience (with consideration for the economic environment), that is on the actual deposit allocation selected by the policyholders. Using the current fund mix as a proxy for the actual deposit allocation may result in an assumption quite different from the expected policyholder behaviour.

In general, the actuary would assume that policyholders will tend to act to the insurer's detriment, to the extent that they expect to benefit. This anti-selection is an important consideration in setting assumptions about allocations among funds. As discussed in section 2.4, however, it may be appropriate in some circumstances to assume that some policyholders do not always act to the insurer's detriment. For example, the actuary may be able to demonstrate that policyholders tend to shift their assets from index linked funds to guaranteed funds as they age, even if this is not necessarily in their best interest. As another example, policyholders may choose to invest in index linked funds in low interest environments because they expect superior returns, even though it would be to the insurer's detriment if the policyholders transferred their funds to the guaranteed accounts with minimum interest rate guarantees. As much as possible, the actuary would use actual company experience to establish such assumptions.

Tax consequences of policyholder actions would also be considered when the policyholder taxation of funds is different (e.g., some policies have both segregated funds and general account funds in the same contract).

The charges debited to the policy on transfer are also taken into account. They could affect the number of transfers in a given policy year.

It would normally be inconsistent with policyholder reasonable expectations to assume that investment fund options that are currently available would be withdrawn in the future.

5. POLICY COMPONENTS RELATED TO EXPECTED ASSUMPTIONS

Policy components consist of charges or credits to the policy. They include COI charges, expense charges, premium loadings, and investment income credited to the policy and any other charge or credit to the policy.

For some UL policies, some of the policy components are guaranteed. For these components, the guaranteed rates would be used in the valuation unless lower charges or higher credits to the policy reflect policyholder reasonable expectations.

For policy components that are not guaranteed, it is necessary to determine a proper set of policy components that are consistent with each scenario and the assumptions used in the scenario.

In order to determine appropriate assumptions for policy components, it is important for the actuary to consider the insurer's philosophy, policies and practices with respect to these items.

5.1 Policyholders' Credited Rate

It may be possible to relate the expected policyholders' credited rate to the assumed asset investment rate when policyholders credited rate guarantees are not present. It may also be possible to relate the expected policyholders' credited rate to the assumed asset investment rate in the case where credited rate guarantees are present (such as linkage to an external index) and asset investments are chosen to match these guarantees.

It may be necessary to establish expected policyholders' credited rates unrelated to the asset investment rate in cases where, for example:

- management tends to set rates based on the declared rates of other insurers;
- the policyholders' credited rate is linked to an external index and asset investments do not match these guarantees.

In such cases, if the selection of interest rate scenarios is deterministic, a larger number of interest rate scenarios would be tested subject to any materiality considerations.

The "spread" available in the future is the difference between the assumed investment rate and the policyholders' credited rate, which may be a key element of the valuation. It may be inappropriate to assume that the current level of this spread will continue to be available for the following reasons:

- future competitive pressures may reduce the spread available;
- contractual guarantees, especially minimum credited rates, may reduce the spread available under some interest rate scenarios;
- assets and liabilities may become mismatched, causing a potential decrease in spread.

When projecting a reduction in the spread available, the actuary would calculate the spread such that it would not be inappropriately reduced twice (for example, projected spread is reduced to provide for an interest rate guaranteed and to account for competitive pressures).

Normally, it would not be assumed that the spread will increase in the future unless it results from a crediting rate strategy where the spread is related to the level of interest rates,⁵ or spreads are currently narrow and are expected to increase. Current rates being credited would be assumed to create policyholder reasonable expectations that the current level of competitiveness in the credited rates will continue or that current spreads will continue. In certain circumstances, it would be appropriate to assume that spreads would decline in the future.

In some cases (e.g., if a credited rate decrease has been temporarily delayed), it may be appropriate to assume that the spread will increase, if supported by the existence of a clear plan by the insurer to rectify the situation. However, the actuary would be satisfied that the insurer by its delay has not effectively changed policyholder reasonable expectations. This is meant to be consistent with a planned change in dividend scales for participating policies. However, usually the reaction time for UL credited rate changes is

⁵ For example, the spread may cover for the Investment Income Tax expense that varies with the level of interest rates.

considerably shorter than the reaction time for participating insurance dividend scale changes. Therefore, the actuary would exercise caution in assuming that the spread will increase in the future.

5.2 Cost of Insurance (COI) Charges

For some policies, the COI charges are guaranteed, and the expected COI charges would be equal to the guaranteed rates. For other policy types, it may be possible to relate the expected COI charges to the expected mortality experience, consistent with the valuation mortality assumption. One complication is that the expected COI charges may contain some loading to recover acquisition expenses (e.g., the reverse select and ultimate COI charges scale). The actuary would attempt to quantify how any change in mortality experience will be passed on to the policyholders in the form of revised COI charges.

For policies with adjustable COI charges, if illustrations projected at various interest rates do not adjust the level COI charges, the actuary would assume that policyholder reasonable expectations are that COI charges are not adjustable for interest rate changes. However, if management has taken action to change these expectations, the actuary could assume that the level COI charges are adjustable for interest to the extent that the expectations have been changed. Even if management has the ability to change COI charges, the actuary would consider the likelihood of such management action, including any historical precedents.

5.3 Expense Charges and Premium Loadings

For some policies, the expense charges and premium loadings are guaranteed, and the expected charges and loadings would be equal to the guaranteed rates. For other policy types, the actuary would quantify how any change in administrative expenses would be passed on to the policyholders.

For policies with adjustable expense charges or adjustable premium loadings, if illustrations do not adjust these charges or loadings, the actuary would assume that policyholder reasonable expectations are that they are not systematically adjustable. For example, if illustrations project level expense charges, the actuary would assume that expense charges are not increased for inflation. However, if management has taken action to change these expectations, the actuary would assume that the charges or loadings are adjustable to the extent that the expectations have been changed. Even if management has the ability to change expenses, the actuary would consider the likelihood of such management action.

6. TAX CONSIDERATIONS

The valuation of the policy liabilities would provide for projected income taxes and other taxes not related to income, as specified in subsection 2320 of the Standards. In providing for these taxes, the actuary would consider the CIA educational note “Future Income and Alternative Taxes” published in 2002. Given the nature of Universal Life plans particular attention is given to the following guidance in that note:

“If beneficial differences (permanent or temporary) rely on a favourable tax interpretation, the actuary would consider the risk of an adverse interpretation by tax authorities (potential “limited shelf life”).”

This section is primarily concerned with tax issues that are specific to the valuation of UL policy liabilities and that are not discussed in the CIA educational note “Future Income and Alternative Taxes.”

6.1 Canadian Investment Income Tax (IIT)

The policy liabilities for Canadian policies would include a provision for future Investment Income Taxes (IIT) payable under Part XII of the Canadian Income Tax Act. The IIT in each future year is related to the tax reserve determined for IIT purposes, associated with the policy in each future year, as well as the five year rolling average bond interest rate (currently, this is defined as Series V122487. It was previously defined as Series B14013). The actuary would calculate the projected tax reserve for this calculation consistently with the tax reserve basis used in the annual filing of the Part XII Investment Income Tax return.

The actuary would project tax reserves consistently with the economic scenario. This is especially important if the IIT cash flows are not explicitly projected in the valuation. For example, if the provision for IIT is approximated by a reduction in available spread, the actuary would review the appropriateness of that assumption for each interest scenario.

The actuary would consider the extent to which the Management Expense Ratio (MER) charged on policyholder funds can be adjusted to recover unexpected variations in IIT. Even if the policy contract allows for IIT to be explicitly recovered, the actuary would consider whether the insurer has exercised this right in practice, and if not, whether the insurer has created a reasonable expectation that variations in IIT will not be recovered.

6.2 Canadian Tax Treatment of Unit Trusts (e.g., Exchange Traded Funds)

The insurer may attempt to support the policyholders’ account balances with matching assets. One asset class that may be used for this purpose is unit trusts, which include, for example, Exchange Traded Funds (ETFs). These are funds that track or replicate a specific index and are listed on major Canadian and US stock exchanges just like individual equities. The actuary is reminded that under current Canadian tax law, investments in unit trusts have a tax treatment materially different from a direct investment in equities. Under existing tax laws and regulations, unit trust investments are not mark-to-market property, unlike equities. Unit trusts are flow-through entities for tax reporting purposes. From the unit trust’s perspective, its investments would generally be considered as capital property and the unit trust’s income, including dividends from taxable Canadian corporations, and any capital gains or losses that the unit trust realizes, would retain their character in the flow-through reporting of such amounts. Whether or not the insurers’ investment in unit trusts is considered capital property generally depends on the facts and circumstances of the company. The actuary would seek appropriate advice from tax professionals in this regard.

Under current tax law, dividends from taxable Canadian corporations are not included in taxable income and only 50% of the capital appreciation on capital property is included in taxable income but only upon realization (i.e., on disposition). Such dividend income and the 50% of capital appreciation on capital property would constitute permanent differences in that they are included in statutory income but permanently excluded from taxable income. Where an amount of capital appreciation is reported for statutory

purposes in a different year or years than it is for income tax purposes, a temporary difference exists.

The valuation of policy liabilities would account for both the permanent and temporary differences arising from the investment in unit trusts. This would result typically in a reduction in policy liabilities, to the extent of the tax-free nature of Canadian dividends and the treatment of capital appreciation.

The actuary would make a number of assumptions in computing the tax implications of these investments in unit trusts. These might be directly available from modeling performed by the actuary, or a specific assumption might be made. Some of the assumptions include, for example:

- The annual yields available from the unit trust, separated between a capital appreciation component and the dividend component;
- The proportion of Canadian dividends earned by the unit trust (as Canadian dividends are not included in taxable income);
- The proportion of the unit trust's capital appreciation that is assumed to be realized annually.

The actuary would perform sensitivity testing to understand the impact that these variables have on the policy liabilities.

6.3 Foreign Withholding Tax

Some of the policyholders' account balances may be invested in foreign (non-Canadian) assets, that may be subject to a withholding tax by the local tax authorities. The actuary would be aware of these situations, and would note that these withholding taxes cannot be deducted from Canadian taxable income (i.e., are unrecoverable), under current tax laws. Further, the actuary would determine whether this withholding tax is recoverable directly from the policyholders under the policy contract. The actuary would provide for any withholding tax that is not recoverable. Such a provision would result in temporary differences between statement and tax reserves, and this temporary difference would also be included in the policy liabilities.

6.4 Exempt Status

In most jurisdictions, life insurance policies are generally exempt from tax, provided that the policy can be demonstrated to qualify as a life insurance contract as opposed to an investment contract. To qualify as life insurance in Canada, for example, a UL policy would typically have to pass an Exempt Test, which measures the relationship of the policyholders' fund balance with the sum assured. If the policy fails the Exempt Test, then investment build-up in the fund would become taxable to the policyholders, unless the policy is modified to pass the test (for example, by increasing the sum assured).

In valuing the policy liabilities, the actuary would consider whether the policy was intended to be tax-exempt or not. The actuary would normally assume that this treatment persists throughout the valuation. For example, if the policy was intended to remain tax exempt, then the actuary would perform an Exempt Test at each future point in the valuation and assume that appropriate action takes place such that the policy remains exempt under the valuation scenario being tested. For example, the actuary could assume

that the sum assured is increased in this situation. Or, the actuary might assume that excess funds are transferred into side funds that are taxable to the policyholders. These side accounts may have different investment characteristics and may therefore result in different spreads to the company. As well, there may be increased expenses due to additional tax reporting requirements.

7. MARGINS FOR ADVERSE DEVIATIONS (MfADs)

In addition to the regular considerations regarding MfADs for mortality, expense, asset default for fixed income assets, cash flow default for non-fixed income assets, and policy lapse, some additional considerations with respect to MfADs apply to the valuation of UL policies. This includes changes in policyholder behaviour, basis risk (where assets are invested differently from investment return credited), and options that may have been granted to the policyholders where the policyholders are likely to select against the company.

The level of margin would be appropriate to the risk or uncertainty present, and would be determined consistent with methodologies for setting assumptions on MfADs discussed elsewhere in the CIA Standards of Practice and in the educational note on Margins for Adverse Deviations released in November 2006.

Given the nature of some of the policyholder options, the valuation assumptions may not always be the sum of a best estimate assumption plus a MfAD, but would be determined by substituting an alternative choice for these assumptions that produces a higher policy liability than the liability resulting from the use of the expected assumption. In these cases, the actuary would use judgment in determining reasonable alternative assumptions. It would be reasonable to produce, through sensitivity testing, a range of results from which to choose and to compare the resulting provisions with other provisions related to assumptions presenting similar risk or uncertainty.

7.1 Interest Rate Risk

Risk due to changes in interest rates would largely be addressed through the scenario-testing process. The actuary would consider the need to test additional scenarios as described in paragraph 2330.29 of the Standards.

Generally, the forecasted net cash flow arising from UL policies is sensitive to the interest rate scenario. In addition, many UL policies have a significant amount of uncertainty in liability cash flows due to uncertainty with respect to policy lapses, partial withdrawal of cash values, premium persistency, transfer of funds, premium allocation and any other assumptions that may be required. Therefore, matching of assets and liabilities may be less certain than it would be for policies with more predictable liability cash flows. To the extent that this uncertainty exists for the policies being valued, additional scenarios would be tested and larger PfADs would be made.

7.2 Mortality Assumption

Certain circumstances may create a situation where a decrease in mortality rates increases the policy liabilities. The policies affected are often referred to as death-supported policies. Section 2.3 of the educational note on Aggregation and Allocation of Policy Liabilities provides advice in this regard. The actuary is reminded that the application of a MfAD would result in an increase to the value of the liability, and that it would be

appropriate for the actuary to assume a negative mortality MfAD if this is necessary to produce a positive mortality PfAD at the chosen level of aggregation.

Death-supporting can occur when the amount ceded under a reinsurance treaty, currently or prospectively, exceeds the direct net amount at risk. This situation is not specific to UL policies, but is not uncommon with level COI UL policies when high percentage quota share YRT reinsurance arrangements ceding a level net amount at risk have been used.

7.3 Policy Lapse Assumption

Special considerations for UL policies that lead to a high margin situation include:

- Premium persistency rates show great volatility;
- The existence of persistency bonuses;
- Credited rate structures such as “bucketing” (higher credited rates for higher fund amounts); and
- Minimum crediting rates.

7.4 Expected Premium and Partial Withdrawal Assumptions

Due to the interaction of the many variables in UL policies, sensitivity testing may be required to determine the correct application of MfADs for these assumptions. For example, lower premium persistency may increase the liability for some policies while a higher premium persistency may increase the liability for other policies. Moreover, the correct application of the margin may be different for different economic scenarios.

Expected premiums may vary with different economic scenarios. The policy design may encourage dump-ins of premiums when rates are rising, or conversely, a reduced level of premium funding when interest rates are low. Particular consideration would also be given to the run-off of any back-end loads on deposits, and the effect this may have on expected lapses.

No MfADs are necessary when there is a specific required premium payable or when there is no partial withdrawal feature. In other situations, MfADs would be needed, subject to the limitations specified in the policy design.

Given the nature of these assumptions, the MfAD would often be applied by substituting an alternative choice for these assumptions which produces a higher liability than the liability resulting from the use of the expected assumption. The actuary would use judgment in determining reasonable alternative assumptions. Refer to the introduction of this section for additional considerations.

7.5 Transfer of Funds and Premium Deposit Allocation Assumptions

For policies where transfer of funds and premium deposit allocation assumptions are necessary, MfADs would be required for these assumptions. Given the nature of these assumptions, the MfAD would be applied by substituting an alternative choice for these assumptions that produces a higher liability than the liability resulting from the use of the expected assumption. The actuary would use judgment in determining reasonable alternative assumptions. Refer to the introduction of this section for additional considerations.

The actuary would consider the impact of the alternative assumptions on the aggregate provision. It may be appropriate to have an explicit provision of zero for the following reasons:

- Provision may be provided elsewhere (e.g., in the crediting rate assumptions or by varying the transfer of funds and premium deposit allocation assumptions with the interest rate scenarios); and
- There are no material differences in net spreads assumed on the different investment funds.

7.6 Policy Components

For policy components that are not guaranteed, the use of a margin may be appropriate to reflect the uncertainty of the assumption. For example, a margin may be added to the policyholders' credited rates to account for potential market pressure to increase credited rates.

7.7 Equity Returns

If the interest rate testing described above does not involve testing of alternate equity scenarios, then a margin on expected equity returns would be needed. Elements include:

- A 5 to 20% margin on annual dividend and 20% margin on capital appreciation;
- A 30% immediate drop in market value of diversified North American equities, to occur at the worst time (25% to 40% for other portfolios);
- Margins for tracking error.

Determining the appropriate time for the immediate drop in equity market values, as well as the direction of the 20% margin, may require sensitivity testing, as there may be a variety of opposing factors involved that influence the outcome. Lower equity returns may result in lower bonuses being paid out, therefore, increasing the spread on policyholders equity funds, but reducing the asset base upon which the spreads are collected. To the extent that equities are also supporting liabilities in excess of the policyholder's fund, lower equity returns would normally increase liabilities. Finally, the effect of income tax would be considered, depending on the types of investments that support the liabilities.

7.8 Aggregate Provisions for Adverse Deviations (PfADs)

It is important to note that PfADs would be appropriate in aggregate. The actuary would consider any potential undesirable compounding of PfADs. This is a particularly important consideration for UL policies, that require additional assumptions regarding policyholder behaviour that may not be necessary in the valuation of other products.

APPENDIX A

SAMPLE UL VALUATION PROCESS

The following describes a process that could be used to develop the valuation of a UL product. Many of the following steps apply to valuations of any product type, but some of these steps are particularly important or unique to UL because they focus on the impact of policyholder behaviour on the structure of the valuation process. Whether this step-by-step process is followed or not, the key is to develop the methodology and process carefully, focusing on the material elements that create the most risk/exposure for the company:

- Understand the product design, credited rate setting, adjustment plan, illustrations and market(s);
- Identify the policy elements that have imperfect flow-through (adjustability) and rank them in priority;
- Identify the distinct market or in-force subsets, differentiating between subsets on the basis of expected behaviour under the control of the policyholder (funding level, premium persistency, investment account selection, partial withdrawals, etc.);
- Define an initial set of valuation sub-segments (“round 1”), based on the above considerations. These would be all distinct in-force subsets where the distinction relates to a material risk for which the product doesn’t allow significant flow-through/adjustability;
- Carefully review the considerations and guidance in this Note for the material risks identified in the last step;
- Define the non-scenario-tested assumptions that apply across all subsegments (for example, possibly mortality, certain administration expenses and investment account spreads). Identify the methodology for measuring, monitoring and setting these assumptions. This educational note and others provide guidance for developing these assumptions;
- Develop the projection model for the product. It would materially reproduce the customer illustration software results assuming like inputs or the differences would be explainable;
- Set up the valuation model incorporating the policy projection tool. Conduct scenario testing for all of the policyholder controlled assumptions considered material, keeping the investment spreads and assumptions constant. If some of these policyholder assumptions are deemed to be strongly correlated to economic assumptions, then the relationship needs to be described/defined. This testing would result in a refinement of the valuation subsegments (“round 2”). Identify the methodology for measuring, monitoring and setting these policyholder behaviour assumptions by subsegment. This educational note and others provide guidance for developing these assumptions;

- Understand the investment strategy for the product and create a tool for modeling it. Conduct roll forward scenario testing for each subsegment using the investment model incorporating the linkages/correlations defined in the prior bullet (for example policy bonuses or policyholder account switching which is assumed to be economic scenario dependent). This testing would lead to the final refinements to the valuation subsegments; in particular, additional subsegments may be needed to capture and reflect appropriately the risks associated with the economic assumption correlations. Identify the methodology for measuring, monitoring and setting the scenario dependent assumptions. This educational note and others provide guidance for developing these assumptions; and
- Finalize the assumptions and procedures for valuing the various subsegments. Test the model and process for reasonableness. Establish appropriate controls. If a Policy Premium Method (PPM) style approximation is to be used to value the portfolio, develop and test any approximations that may be needed.

APPENDIX B

APPLICATION OF CALM

The following describes one approach that could be used in applying the Canadian Asset Liability Method (CALM). It is assumed that the actuary would already have followed a process such as that illustrated in Appendix A, to divide the product into appropriate valuation segments. For illustration purposes, it is assumed further that only the interest rates are scenario tested (i.e., equity returns are not scenario tested). Where equity returns are scenario tested, the actuary would consider making an assumption about the correlation between equity returns and interest rates.

This approach could be applied by either ignoring or including income taxes. If income taxes are ignored, then the provision for future taxes would have to be approximated using a separate process.

First determine assumptions and policy components consistent with the expected (base) interest rate scenario (steps 1 to 3):

1. Make assumptions about the expected interest rate scenario without MfADs:
 - All elements of the interest rate scenario (reinvestment interest rate assumptions, rates of general inflation, reinvestment/disinvestment/borrowing strategies,);
 - Rates of income and capital appreciation/depreciation on non-fixed income assets⁶;
 - Mortality assumptions;
 - Expected benefit pattern;
 - Expense assumptions;
 - Policy lapse assumptions;
 - Probability of premium payment and level of premium persistency;
 - Partial withdrawal pattern;
 - Transfer of funds between investment fund options;
 - Premium deposit allocation between investment fund options; and
 - Tax assumptions, such as income tax rates, tax treatment of various asset classes, dividend withholding taxes.
2. Determine the expected policy components consistent with the expected assumptions:
 - Expected premium loading;
 - Expected expense charges;
 - Expected Cost of Insurance (COI) charges;
 - Expected investment rates credited to policyholder funds; and

⁶ SOP provides guidance in subsection 2340.

- Investment or persistency bonus rates.
3. Apply MfADs to the expected assumptions⁷ and to the expected policy components, where applicable, to determine the valuation scenario assumptions. Sensitivity testing may be required to determine the direction in which the MfADs would be applied. The proper application of the margin may be different for different policies and for different durations. For example, margins on partial withdrawal rates might be positive for scenarios where reinvestment rates increase and negative for where reinvestment rates decrease. In addition, sensitivity testing may be required to determine the size of the margins in the presence of policyholder pass-through features.

The effect of income tax would be considered in determining the appropriate direction of margins for expected assumptions, where this is material. For example, SOP require that margins for non-fixed income assets include a 30% drop in market value at the worst time, which might be materially different if determined on an after-tax basis. For example, if the liability is supported with tax preferred assets where the preferential tax treatment is not assumed to continue indefinitely, the timing of the 30% drop could be different than if determined on a pre-tax basis.

Then, for each interest rate scenario⁸, perform the following steps:

4. Determine the assumptions for the interest rate scenario. Revise the valuation assumptions to be consistent with these interest rate scenario assumptions. Policyholder behaviour may vary with the assumptions in each scenario.
5. Revise the expected policy components consistent with the interest rate scenario and review the proper application of the applicable margins. This process would take into account policyholder reasonable expectations and policyholder expected behaviour, including:
 - The insurer's formal or informal policy for making changes to policy components;
 - Policy guarantees, contractual limits or market pressures that may limit the insurer's freedom to make changes;
 - Practical limitations (e.g., systems and administrative) that may impair the insurer's ability to make timely changes;
 - The insurer's recent practice in adjusting policy components; and
 - Illustrations provided to policyholders.
6. Starting with the current policyholder fund balance, current assets, valuation policy components and assumptions, project future policy elements and future asset and liability cash flows. In cases where the credited rates (and/or other assumptions and policy components) are derived on a portfolio basis, this process may need to be done

⁷ Except the interest rate assumption and other scenario-tested assumptions.

⁸ Scenario refers equally to a scenario in a deterministic or a stochastic application.

duration by duration instead of policy by policy.⁹ For some types of policies, policyholder behaviour, credited rates or other policy components may be dependent on elements of the projections. In these cases, steps 4, 5 and 6 would be closely integrated and could involve an iterative approach.

7. Using these asset and liability cash flows, determine the scenario liability amount.
8. Determine the final liability amount based on the scenario testing of steps 4 through 8 as provided under paragraphs 2320.50 and 2320.51 of the Standards.

⁹ Consider a matrix, where the rows are each policy and the columns are each duration. The traditional way of valuing would be to calculate cash flows for each row, then add them up to obtain total cash flows by duration. The process described above would require a calculation of cash flows column by column instead of row by row. After each column is calculated, the aggregate liability cash flow can be combined with the aggregate asset cash flow to determine the fund credited rate for the next duration.