



Further clarification would be appreciated, making it clear whether the intent of the guidance is to direct the Appointed Actuary to opine, regardless of materiality.

COPLFR would also note two additional concerns that seem appropriate for future consideration by AOWG. We do not anticipate AOWG will be able to address these concerns for the 2024 regulatory guidance. However, we would ask whether it would be possible for clarifications to be considered. Then, more significant changes could be considered for 2025 or later.

1. It is our understanding that AOWG is already considering clarifying the meaning of Exhibit B, disclosure #10. Our members have observed some inconsistent interpretations and appreciate any clarification that AOWG would offer.
2. Some items in Exhibit A and B of the SAO do not have direct ties to the Annual Statement, including long-duration UEPR, net amounts from voluntary and involuntary pools, claims made, extended loss and loss adjustment expense, and unearned premium reserves. COPLFR would appreciate the opportunity to discuss how these items are used by regulators. Many Appointed Actuaries are not officers of the insurer for which they are opining. Thus, it may be more appropriate for these items to be disclosed directly by the company in the Annual Statement, rather than designating the SAO as the sole source of disclosure. Given the absence of a “check” back to the Annual Statement, there are inconsistencies in how these items are populated which