

Financial Condition Reports in General Insurance - The Latest Steps

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Overview

- Background & purpose
- Development of standards to May 2005
- APRA's GPS 310
- APRA's GGN 310.1
- Scope of FCR
- Discussion points
- Final words







Background & purpose

- HIH Royal Commission recommended an FCR (accepted by Government)
- APRA asked IAAust to develop standards
- Overview of key risks and issues facing insurer
- Important input into decision-making by Board/senior management in respect of operations of insurer







Development of standards to May 2005

Item	Action	Date	Outcome
1	Formation of FCR for GI Taskforce	Dec 2002	Production of IAAust standards
2	HIH Royal Commission Report	Apr 2003	Recommendation for FCRs (#41)
3	Discussion Draft PS3XX	Nov 2003	Presented at IAAust GI Seminar
4	APRA Stage 2 Reforms	Nov 2003	Proposal for FCRs (#2.13)
5	Consultation with members, APRA, ICA, accountants	2004	Modification of IAAust standards in response to input
6	Discussion Draft PS305/GN355	Feb/Mar 2005	Horizons meetings with membership
7	APRA GPS 310/GGN 310.1	May 2005	Requirement for FCRs (#26) Submissions by 5 Aug 2005 Release date proposed Jan 2006







APRA's GPS 310

Approved Actuary's primary roles

- Advise on valuation of insurance liabilities (LVR)
- Objective assessment of overall financial condition (FCR)
- Advise on other matters insurer considers appropriate

Timing issues

- Use of FCR and LVR in preparing statutory accounts
- LVR to the Reviewing Actuary for peer review
- FCR and LVR to APRA with yearly statutory accounts

Exempt insurers

- Require no Approved Actuary, FCR, LVR, no peer review, but must still value liabilities according to GPS 310.2
- Exempt if gross liabilities < \$20m, no material long tail liabilities, attest criteria to be met in next 12 months







APRA's GGN 310.1

- FCR must assess key risks and issues impacting financial condition of insurer
- Insurance group may submit a single over-arching FCR
- Consideration of financial position of corporate group to which the insurer or insurance group belongs
- For foreign insurers require FCR for Australian branch operation, with consideration of H.O. financial position
- Reasonable steps to verify the consistency, completeness and accuracy of data provided with financial and other records
- Where the Approved Actuary is relying on work undertaken by other actuaries, satisfaction as to assumptions and methods
- Level of detail in FCR depends on size and complexity of operations of insurer and considerations of materiality







Scope of FCR (ref GPS 310 par 44)

- Review of the insurer's recent experience;
- Summary of the key results of LVR;
- Assessment of adequacy of past estimates for insurance liabilities;
- Outline and assessment of asset and liability management (was "matching" in Nov03 Stage 2 Reforms), including insurer's investment strategy (was also "assess suitability of assets");
- Assessment of current and future capital adequacy with discussion of insurer's approach to capital management;
- Advice in respect of premium adequacy (was "premium setting");
- Assessment of the suitability and adequacy of reinsurance arrangements; and
- Assessment of the suitability and adequacy of risk management framework (was "systems and controls").







Discussion points

- Commentary on insurer's non-insurance liabilities, in particular any known contingent liabilities (ref GGN 310.1 #19c)
- Commentary on asset valuation methods used by the insurer and on any significant changes (#19d)
- Continuous compliance with MCR over the past year (#22)
- Assessment of capacity to meet the MCR and capital targets over the next three years, including quantitative and qualitative stress and scenario testing (#23)
- Documentation of reinsurance arrangements and existence and impact of any limited risk transfer arrangements (#28, #29)
- Commentary on adequacy of risk management framework of insurer (#30)







Final words

- IAAust PS305 to be revised, taking regard of:
 - Horizons meetings discussions and submissions
 - Issues of consistency with APRA GGN 310.1, which may be withdrawn once sufficiently covered by IAAust standard (p18)
- FCR requirements from beginning of financial year after Jan 2006 (p7)
- Reports due to APRA covering prior financial years included (p7)