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

**Amendment Proposal Form**

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

Staff of Office of Principle-Based Reserving, California Department of Insurance,
 Minor correction to descriptive language in VM-A and VM-C.

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

 Valuation Manual (January 1, 2019 edition), VM-A and VM-C

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

See attached Appendix. These proposed changes are for clarification only and as such are **non-substantive.**

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

See attached Appendix.

NAIC Staff Comments:

|  |  |  |  |
| --- | --- | --- | --- |
| **Dates:** Received | Reviewed by Staff | Distributed | Considered |
| 12/3/18 |  |  |  |
| **Notes:** VM APF 2018-64 (CA APF-CQ) |

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#### Appendix

#### ISSUE:

VM-A and VM-C list many requirements, not all of which pertain to reserves. Thus the introductions to them should be characterizing the items listed as “requirements”, not “reserve requirements”. (The title of VM-A already is correct in this regard.)

#### SECTIONS:

VM-A and VM-C

#### REDLINE:

## **VM-A: Appendix A – Requirements**

Unless otherwise noted, this appendix references the following requirements from Appendix A of the AP&P Manual.

## **VM-C: Appendix C – Actuarial Guidelines**

**Guidance Note:** This appendix references the following requirements from Appendix C of the AP&P Manual.

#### REASONING:

Clarity.