

**26 March 2019**

**ASSC review of draft EAN on Actuarial Function for IORP II**

1. Paragraph 3.2 of the draft due process for EANs states

*3.2 The ASSC reviews the exposure draft in terms of language and format (as per the AAE style guide). The ASSC's review should also include consideration of any apparent overlap or conflict between the proposed EAN and existing EANs or ESAPs, where appropriate ESAPs and EANs under development, and any relevant ISAPs and IANs.*

2. Note 14 of the style guide sets out specific additional requirements for EANs as follows:

*Any document proposed as a European Actuarial Note (EAN):*

- a. *Must be written in straightforward language in whatever style and format that suits the need (E.g. question and answer format). The style and format selected by the drafting committee should be acceptable to the Professionalism Committee*
- b. *Must not contain directive words such as "must" and "should", other than in a citation.*
- c. *Must not contain sections such as "**Scope**" or "**Application**" which suggest to the reader that it is a standard*
- d. *Any citation from another document should be quoted verbatim and not paraphrased. The citation should be delimited by quotation marks and the reference (source) given so it is very clear it is a citation.*

3. The style guide also sets out requirements which papers should, as far as possible, follow. Some of these would not be appropriate for an EAN but the following would seem to be relevant:

- **Purpose:** *The purpose of the paper should be made clear in the introductory paragraphs.*
- **Target Audience:** *The group(s) of people expected to read the paper and for whom the paper was written should be stated at the beginning of the paper.*
- **Table of Contents:** *For a paper more than a few pages long, a table is necessary indicating each section with a descriptive title (or a short title with further brief explanatory wording).*
- **Executive Summary:** *A summary of the paper very briefly covering the salient point(s) from each of the main sections and overall conclusion(s) should be available and provided near the top of the paper.*
- **Paragraph Numbering:** *Paragraphs should be numbered for easy cross referencing within the paper and for readers making later comments in correspondence, in further papers or in meetings.*

4. I have reviewed the draft having regard to the above requirements and have discussed the structure of the draft with Cathal Fleming, who led the Task Force which drafted the paper.

5. With regard to the language of the EAN, I confirm that in my view the draft is written in straightforward language and it does not contain directive words such as "should" or "must". There is a frequent use of words/terms such as "may", "could", "might", "may be useful" which make it clear that the actions suggested are not binding guidance.

6. In relation to the format of the draft, I confirm that the **Purpose** and **Target Audience** are covered in the Preface, and that there is no reference to **Scope** or **Application**.

7. There are a number of aspects in which the EAN as currently drafted does not meet the requirements of the style guide:
  - **Citations** from the Directive should be delimited by quotation marks and the exact reference given
  - There is no **Table of Contents**, although the document may be too short to merit this
  - There is no **Executive Summary**, although it is arguable that this would not be appropriate in an EAN
  - There is no **Paragraph Numbering**, other than for the Sections of the paper. For example, the paragraphs in Section 5 should be numbered 5.1, 5.2 etc.
8. These issues can readily be addressed by the Task Force prior to issue of the EAN for member consultation if this is considered appropriate.

On behalf of the ASSC

Philip Shier