

Title of Exposure Draft: Enterprise Risk Management (Second Exposure Draft) [link](#)

Comment Deadline: November 1, 2024

Instructions: Please review the exposure draft, and give the ASB the benefit of your recommendations by completing this comment template. Please fill out the tables within the section below, adding rows as necessary. Sample for completing the template provided at the following link: <http://www.actuarialstandardsboard.org/email/2020/ASB-Comment-Template-Sample.docx>

Each completed comment template received by the comment deadline will receive consideration by the drafting committee and the ASB. The ASB accepts comments by email. Please send to comments@actuary.org and include the phrase 'ASB COMMENTS' in the subject line. Please note: Any email not containing this exact phrase in the subject line will be deleted by our system's spam filter.

The ASB posts all signed comments received to its website to encourage transparency and dialogue. Comments received after the deadline may not be considered. Anonymous comments will not be considered by the ASB nor posted to the website. Comments will be posted in the order that they are received. The ASB disclaims any responsibility for the content of the comments, which are solely the responsibility of those who submit them.

I. Identification:

Name of Commentator / Company
Thrivent

II. ASB Questions (If Any). Responses to any transmittal memorandum questions should be entered below.

Question No.	Commentator Response

III. Specific Recommendations:

Section # (e.g. 3.2.a)	Commentator Recommendation (Please provide recommended wording for any suggested changes)	Commentator Rationale (Support for the recommendation)
1.1 and 1.2	...actuaries when performing actuarial services with respect to developing, <u>applying</u> , maintaining, or reviewing all or part of an...	Current language doesn't cover application (e.g., applying or using the ERM framework).
2.1	<u>Assets less liabilities and required capital, which is surplus available for the company to use at its discretion.</u>	Isn't a more common definition of available capital the capital beyond any which has been set aside as required (e.g., for risk, regulation, and credit ratings)?
2.17	Scenario analysis may include a narrative (non-financial) description or numerical (financial) calculations.	Numerical calculations can be non-financial (e.g., policyholder counts declining due to a reputational event scenario).
3.8.3	<u>For at least capital and liquidity</u> , when performing actuarial services related to stress testing or scenario analysis associated with capital and liquidity , the actuary should refer to sections 3.8.1 and 3.8.2.	Only capital and liquidity are called out in this section, but stress testing & scenario analysis are used for many other measures.

IV. General Recommendations (If Any):

Commentator Recommendation (Identify relevant sections when possible)	Commentator Rationale (Support for the recommendation)

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3.6.b mentions inherent and residual risk. These should be discussed more, including (1) definitions for each (section 2), and (2) recommended practices when setting each (section 3).	Inherent risks and residual risks are prominent topics that help ERM practitioners prioritize and manage risk.

V. Signature:

Commentator Signature	Date
Caleb Bousu	10/31/2024
Ross Starfeldt	10/31/2024
Brad Williams	10/31/2024
Anna Bearrood Widman	10/31/2024