

**CLRS**  
*IFRS 17: What's the Punchline?*

September 2022

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### Introduction



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## Agenda

Topic	Time
1 - Overview of IFRS 17	10
2 - Premium Allocation Approach (PAA)	10
3 - General Model (GMM)	20
4 - Level of Aggregation	10
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# 1

## Overview of IFRS 17

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## What is IFRS 17?

IFRS17 is the new International Financial Reporting Standard (IFRS) for insurance contract accounting, effective 01/01/2023.

On 18 May 2017, the International Accounting Standards Board (IASB) finished its long-standing project to develop an accounting standard on insurance contracts and published IFRS17, 'Insurance Contracts'. On 23 June 2020, the IASB modified IFRS 17 for selected changes requested by industry.

IFRS17 replaces IFRS4, which currently permits a wide variety of practices. IFRS17 will fundamentally change the accounting by all entities that issue insurance contracts.

For insurers, the transition to IFRS17 will have significant impact on financial statements, key performance indicators, financial reporting process and operations.

The standard applies to annual periods beginning on or after 1 January 2023, with earlier application permitted if IFRS15, 'Revenue from Contracts with Customers', and IFRS9 'Financial Instruments', are also applied.




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### IFRS 17 – The basics

<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Who/Where affected?</b>	<b>What's required?</b>	<b>When?</b>	<b>Why?</b>
Applies to insurance contracts issued, reinsurance contracts, and certain investment contracts issued by entities applying IFRS	Current value measurement model, with recognition of profit from a 'group of insurance contracts' over the period the entity provides insurance coverage and as the entity is released from risk	1 January 2023, requiring retrospective adoption, but with options if impracticable; comparative balance sheets needed for both December 31, 2023 and 2022; earlier application permitted	To drive consistency and comply with IASB guidance; IFRS 4 was an interim standard that allowed entities to use a wide variety of accounting practices reflecting local accounting practices and variations of those practices

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### IFRS 17 – Measurement models

	General model (GMM)	Premium allocation approach (PAA)	Variable Fee Approach (VFA)
<b>Why is it needed?</b>	Default model for all insurance contracts	To simplify for short term contracts with little variability	To deal with participating business where payments to policyholders are linked to underlying items like assets
<b>Types of contract</b>	<ul style="list-style-type: none"> <li>P&amp;C insurance contracts</li> <li>Reinsurance</li> </ul>	<ul style="list-style-type: none"> <li>Some P&amp;C insurance</li> <li>Contracts with coverage periods less than 1 year</li> <li>Some Reinsurance</li> </ul>	<ul style="list-style-type: none"> <li>Unprofitable contracts</li> <li>Variable annuities with certain equity indexed contracts</li> <li>Contract insureds 80% or more</li> <li>Life with investment contracts</li> </ul>
<b>Mandatory?</b>	Mandatory	Optional	Mandatory

*VFA is generally not applicable for P&C*

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### Scope of IFRS 17 – Separation of non-insurance components may be required

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graph TD
    Q1{1. In scope of IFRS 17?} -- No --> A1[Guidance in other IFRS]
    Q1 -- Yes --> Q2a{2a. Embedded derivatives?}
    Q1 -- Yes --> Q2b{2b. Distinct investment components?}
    Q2a -- Yes --> A2[Separate not closely related embedded derivatives and distinct investment components]
    Q2a -- No --> Q3{3. Are there distinct service components?}
    Q2b -- Yes --> A2
    Q2b -- No --> Q3
    Q3 -- Yes --> A3[Separate distinct service components]
    Q3 -- No --> A4[Remaining host contract]
    A2 --> Q4{4. Determine the level of aggregation}
    A3 --> Q4
    A4 --> Q4
    Q4 --> Q5{5. Determine the measurement model (general measurement model, premium allocation approach, variable fee approach)}
    
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### Questions for Audience

What's the effective date of IFRS 17?

- A. 1/1/2022
- B. 1/1/2023
- C. 1/1/2024
- D. 1/1/2025

What model will the majority of P&C contracts fall under?

- A. General Model
- B. Premium Allocation Approach
- C. Variable Fee Approach

What are your IFRS reporting requirements?

- Group reporting
- Local regulatory reporting
- No IFRS Reporting requirements

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## Premium Allocation Approach (PAA)

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### Polling Question

Has your organization started performing PAA eligibility testing?

1. Not started
2. Identified units of account that will require eligibility testing
3. Identified units of account that will require eligibility testing and have started or performed limited analysis
4. Completed quantitative eligibility analysis
5. Not applicable

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### PAA - What IFRS 17 means for most P&C contracts

- The "Premium Allocation Approach" (PAA) option is expected to be applicable to and elected for most property/casualty (P&C) contracts – the IASB views the PAA as a simplification of the General Model for the Liability for Remaining Coverage (LFRM)
- For most P&C contracts, IFRS 17 using the PAA for LFRM is similar to common accounting frameworks in place today, but with several key differences:
  - o Use of "mean" rather than undefined "best estimate" for incurred claims
  - o Discounting of incurred claims through finance
    - > At statement date rates for balance sheet
    - > Option to use rates at incurred loss date for the income statement (OCI Option)
  - o A "risk adjustment" reflecting uncertainty in amount/timing of unpaid claims
  - o Earned revenue pattern based on timing of expected incurred losses, if the expected pattern of release of risk (i.e., decrease of expected incurred losses) during the coverage period differs significantly from the passage of time
  - o Other key differences include (1) exclude deposit component from revenue and claims incurred expense, (2) ceding commissions netted against reinsurance premiums, (3) present DAC net against LFRM, and (4) more granular level of onerous contract testing (akin to UPR deficiency test)

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### PAA eligibility criteria

Paragraph 53

An entity may simplify the measurement of a group of insurance contracts using the premium allocation approach if, and only if, at the inception of the group:

- a. The entity **reasonably expects** that such simplification would produce a measurement of the **liability for remaining coverage** for the group that would **not differ materially** from the one that would be produced applying the General Model; or
- b. The coverage period of each contract in the group (including coverage arising from all premiums within the contract boundary determined at that date) is **one year or less**.

Criterion (a) above is not met if at the inception of the group an entity expects **significant variability** in the fulfillment of cash flows that would affect the measurement of the liability for remaining coverage during the period before a claim is incurred.

**1** What is the unit of account?

**2** What are the coverage units?

**3** What is materiality?

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### Comparison of the Measurement Models

	US GAAP	General Model	PAA	
Unexpired risk	UPR less DAC	Contractual Service Margin Risk adjustment Discounting Expected value of future cash flows	Premium (less acquisition costs) unearned	<b>Qualifying for the PAA</b> Automatically available for contracts with coverage period twelve months or less. Unlikely that all contracts will automatically qualify for PAA model. Mixed measurement models within a reportable segment may make results difficult to interpret.
Expired risk	Undiscounted reserves for past claims (including IBNR)	Risk adjustment Discounting Expected value of future cash flows	Risk adjustment Discounting Expected value of future cash flows	
				<b>Drivers of profit</b> Changes to yield curves may require closer asset liability matching to manage income statement volatility. No prescribed method for measuring the risk adjustment but entity required to disclose methodology and confidence level and expected to be consistent year on year.

\* Size of blocks are for illustrative purposes only  
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### PAA

Why is it a useful simplification of the general model?

LRC is accounted for using an Unearned Premium Reserve methodology (similar to current US GAAP):

- Under the General Model, an entity is required to establish an estimate of the expected value of future cash flows for both the expired and unexpired risk (and determine a CSM).
- Under the PAA, estimating the expected value of future cash flows is required only for the liability for incurred claims unless the contract is deemed onerous (which would then require the measure of the unexpired risk using the General Model framework to quantify the loss amount that must be recognised).

Do not need to calculate a CSM:

- Do not need to determine the estimated lifetime profitability of the contract at issue date.
- No need to continue to solve for unexpired CSM at future valuation dates.

In most cases, there are a reduced amount of calculations needed for the PAA:

- Onerous contract determination simplified (i.e., no need to project future incurred losses unless facts & circumstances indicate that a group of contracts is onerous)
- Discounting is not required if the future cash flows are expected to be postreceived within a year from the date incurred

Companies can leverage current US GAAP reserve estimates, with applicable adjustments:

- Unbiased mean, discounting, risk adjustment.
- System updates are still needed to quantify and track these adjustments through time.

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### PAA eligibility

Key characteristics impacting eligibility

- Coverages in which the pattern of incurred claims is either highly seasonal or otherwise differs significantly from an even release over the coverage period
- Longer coverage period, in general
- Long payout patterns for incurred claims, particularly in higher and/or more volatile interest rate environments
- High level of profitability expected (ie large CSM)

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### Questions for Audience

Which of the following is simplified when using the PAA as compared to the GMM?

- Liability for remaining coverage
- Liability for incurred claims

Which of the following does NOT need to be calculated under the PAA?

- Best estimate of fulfillment cash flows
- Discounting
- Risk Adjustment
- Contractual Service Margin

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# 3 General model (GMM)

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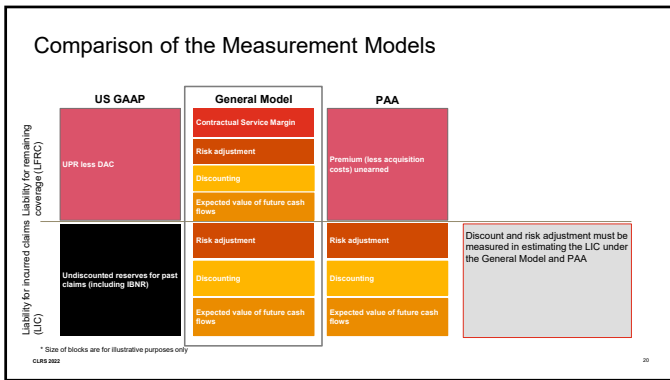
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### Should you use the PAA model?

<p><b>Advantages</b></p> <ul style="list-style-type: none"> <li>Fewer disclosures</li> <li>No CSM required</li> <li>No risk adjustment for LFRG</li> <li>Discounting may be optional</li> <li>Close alignment to current approach</li> </ul>		<p><b>Disadvantages</b></p> <ul style="list-style-type: none"> <li>Fewer profitability insights</li> <li>Some groups may require GMM</li> <li>Changing circumstances (e.g. business mix in future) may require GMM</li> <li>Cash flow modelling needed for eligibility and onerous test</li> <li>Operational impacts of using 2 models</li> </ul>
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### Default model for all in-scope insurance contracts

<ul style="list-style-type: none"> <li>Contractual service margin to prevent gain on policy inception. <b>Unearned profits</b> recognised over coverage period.</li> </ul>	<b>Contractual service margin</b>	<b>Impact</b> <ul style="list-style-type: none"> <li><b>No equivalent today.</b> Unearned profit in the contract, released based on coverage units.</li> <li><b>Methodology could be similar to current practices.</b> Explicit allowance for risk; differences with Solvency II likely.</li> <li>Traditional methods could support cash flow projection; <b>presentation requirements may require additional build effort.</b></li> <li>Methodology similar to current practices, differences in assumptions (e.g. expenses or discount rates) and contract boundaries. <b>Current models and methods can likely be used, especially for LIC.</b></li> </ul>
<ul style="list-style-type: none"> <li><b>Reflect compensation entity requires</b> for uncertainty. Quantifies the value difference between certain and uncertain liability.</li> </ul>	<b>Risk adjustment (non-financial)</b>	
<ul style="list-style-type: none"> <li>Discounting future cash flows using 'top-down' or 'bottom-up' approach for <b>discount rates to reflect characteristics of the liabilities.</b></li> </ul>	<b>Discounting</b>	
<ul style="list-style-type: none"> <li>Estimated cash flows – <b>explicit, unbiased</b> and probability weighted estimate of fulfilment cash flows.</li> </ul>	<b>Expected value of future cash flows</b>	

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### Future cash flows

<ul style="list-style-type: none"> <li><b>Contractual service margin</b></li> <li><b>Risk adjustment (non-financial)</b></li> <li><b>Discounting</b></li> <li><b>Expected value of future cash flows</b></li> </ul>	<b>Expected future cash flows</b> <ul style="list-style-type: none"> <li>Current estimate</li> <li>Probability weighted <b>mean</b> of range of possible outcomes</li> <li>Entity perspective for other cash flow estimates</li> <li>Incorporates all available information in <b>unbiased</b> way</li> <li>Include options, forwards and guarantees related to insurance coverage under existing contract unless separated</li> <li><b>Loss component</b> of the liability for remaining coverage is maintained for onerous contracts <b>under both the general model and the PAA</b></li> </ul>
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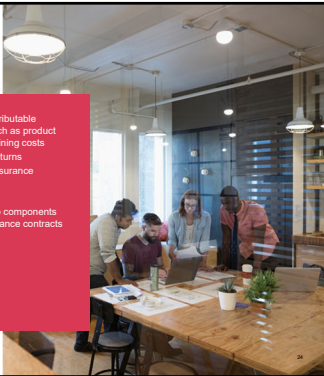
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### Fulfilment cash flows (cont'd)

<b>Included<sup>1</sup></b> <ul style="list-style-type: none"> <li>Premiums and related payments</li> <li>Claims and benefits, including paid in kind</li> <li>Discretionary payments and payments that vary with returns on underlying items</li> <li>Payments from embedded derivatives, including options and guarantees</li> <li>Insurance acquisition cash flows</li> <li>Claim handling costs</li> <li>Administration and maintenance costs</li> <li>Transaction-based taxes and levies</li> <li>Recoveries such as salvage and subrogation</li> <li>Fixed and variable overheads</li> <li>Other costs</li> </ul>	<b>Excluded</b> <ul style="list-style-type: none"> <li>Some not directly attributable acquisition costs, such as product development and training costs</li> <li>Assets investment returns</li> <li>Cash flows from reinsurance contracts held</li> <li>Income taxes</li> <li>Cash flows related to components separated from insurance contracts</li> </ul>
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<sup>1</sup> Only if directly relate to the fulfilment of the contract

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### Discount rates (approach to determining discount rates)

**Contractual service margin**

**Risk adjustment (non-financial)**

**Discounting**

**Expected value of future cash flows**

**General background:**

- Measuring liabilities on a present value basis is theoretically consistent with measurement of assets, therefore providing more relevant information about an insurers financial position
- Discounting must use rates consistent with observable market prices for financial instruments having characteristics consistent with insurance liabilities

**Key question:** How should discount rates be determined for insurance liabilities?

**Common practice today under IFRS 4:**

Expected return on assets held...however, this means the fundamental economics of the business are not necessarily reflected in the IFRS reserves, for example:

- Different liability values can be obtained depending on the choice of assets (open to manipulation!)
- Duration mismatches can be hidden from users of the results
- May not meet IFRS 17 requirements to be consistent with insurance liabilities

**Options Under IFRS 17:** Either a top-down or bottom-up approach are allowed

**IFRS 17 requirements:**

- Paragraph 36
- Application Guidance paragraphs B72 – B85
- Basis for Conclusions paragraphs BC185 – BC205

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### Discount rates

Discount rates are applied in IFRS 17 for multiple items:

	Use	Update of assumption
Current (best estimate) discount rates	Used for the measurement of the liability for the reporting period	<b>Updated:</b> Each reporting period
Locked-in discount rates (the discount rate at inception)	<p><b>Set at inception</b></p> <p>Used for (in General Approach)</p> <ul style="list-style-type: none"> <li>Calculation of the impact of assumption changes</li> <li>Interest accretion on CSM</li> </ul>	<b>Not updated:</b> Locked-in at inception

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### Discount rates (top down vs. bottom up)

**Contractual service margin**

**Risk adjustment (non-financial)**

**Discounting**

**Expected value of future cash flows**

**Top down discount rate**

Actual or expected reference portfolio rate	5.0%
Duration mismatches	0.3%
Market risk premium for expected credit losses	(1.0%)
Market risk premium for unexpected credit losses	(0.6%)
<b>Insurance contract discount rate</b>	<b>3.7%</b>
<b>Difference between the two methods not required to be reconciled</b>	

**Bottom up discount rate**

<b>Insurance contract discount rate</b>	<b>3.5%</b>
Liquidity premium	1.5%
Risk free rate of return	2.0%

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## Risk adjustment

**Contractual service margin**

**Risk adjustment (non-financial)**

**Discounting**

**Expected value of future cash flows**

**The risk adjustment**

- Reflects compensation that entity requires for bearing uncertainty. Measures compensation to make entity indifferent between:
  - Range of possible outcomes.
  - Fixed cash flows with same expected value.
- IFRS 17 does not require entities to use any specific technique to estimate the risk adjustment.
- The risk adjustment should only reflect the risks that arise from the insurance contract.

**Key characteristics**

- Company perspective (not exit or fair value since those are market perspectives).
- Diversification (as considered in the original charges).
- Non-hedgeable risks only (e.g. non-financial risks).
- Explicit and not in expected cash flows or discount rates (thou shall not double count).
- No prescribe method (but required disclose implied confidence level).
- Possible methods...

<b>Cost of capital</b>	<b>Confidence level</b>	<b>Conditional tail</b>
Cost of setting up the economic capital required for the lifetime of the portfolio. No prescribed capital or percentage cost.	Value at risk – used to measure the expected loss on the portfolio at the specified confidence level over specified time horizon.	Tail value at risk – Used to measure the expected loss on the portfolio as an average of outcomes occurring above specified confidence level over the specified time horizon.

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## Risk adjustment – Key characteristics

IFRS 17 is non-prescriptive regarding how a Company may calculate its Risk Adjustment for non-financial risk. However, the guidance lays out the following general guidelines when describing the Risk Adjustment:

<p><b>1</b> Risks with low frequency and high severity will result in higher risk adjustments for non-financial risk than risks with high frequency and low severity.</p>	<p><b>4</b> The less that is known about the current estimate and its trend, the higher will be the risk adjustment for non-financial risk.</p>
<p><b>2</b> To the extent that emerging experience reduces uncertainty about the amount and timing of cash flows, risk adjustments for non-financial risk will decrease and vice versa.</p>	<p><b>5</b> Risks with a wider probability distribution will result in higher risk adjustments for non-financial risk than risks with a narrower distribution.</p>
<p><b>3</b> For similar risks, contracts with a longer duration will result in higher risk adjustments for non-financial risk than contracts with a shorter duration.</p>	

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## CSM

**Contractual service margin**

**Risk adjustment (non-financial)**

**Discounting**

**Expected value of future cash flows**

**Contractual service margin (CSM)**

- Represents unearned profit in contract
- Unlocked for changes in fulfillment cash flows related to future services
- CSM cannot be negative, but can be reinstated
- Previous losses have to be reversed before reinstating the CSM
- Released over coverage period based on coverage units
- Coverage units reflect quantity of benefits and expected coverage duration
- Locked in rates should be used for accretion of interest and calculation of changes in cash flows that offset the CSM

**Onerous contracts**

- A group of insurance contracts is onerous if total fulfillment cash flows at the date of inception are a net outflow (negative CSM)
- Losses from onerous contract groups are immediately recognized in profit or loss

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### CSM – Coverage units

- Coverage units are used to determine the CSM portion to be recognised in the P&L. It should accurately depict the different levels of service provided in different periods.
- Determined by considering the quantity of the benefits provided and the expected coverage duration for each contract.

#### Determining the 'quantity of benefits'

Quantity of Benefits requires the entity to consider expected benefits **received by the policyholder**, and not the **cost of providing these benefits**.

Options include (but not limited to):

- Maximum contractual cover.
- Amount the entity expects a policyholder can validly claim in each period.

**Quantity of Benefits based on premiums or expected cash flows could be appropriate if they provide a reasonable proxy for services provided in the period.**

Judgment is required to determine a quantity of benefits that meet the measurement objective of the standard.

#### Implementation considerations:

- Coverage units are not easily determinable for all products
- Many life products typically look to a face value amount

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### Questions for Audience

Which building block prevents gain on policy inception and ensures profit is recognized over the coverage period?

- Best estimate of fulfillment cash flows
- Discounting
- Risk Adjustment
- Contractual Service Margin

What is the term for the quantity of benefits that is used to amortize the CSM over the coverage period?

- Cash flows
- Coverage units
- Acquisition expenses
- Revenue recognition

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## Level of aggregation

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## Level of Aggregation

1. **Objective**
- Profitable vs onerous contracts
  - No CSM at the end of the coverage period
2. **Considerations**
- Portfolios must be comprised of contracts with similar risks that are managed together
  - Within a portfolio, contracts are grouped at a more granular level based on profitability and issue date considerations
  - The characteristics of the contracts comprising a particular group will determine the appropriate measurement model to be used (Premium Allocation Approach or General Model)
  - The overall aggregation decision will determine the recognition and amortization of Contractual Service Margin (CSM)

### 3. Aggregation requirements\*

Top-down approach: Start at portfolio level (similar risks, managed together)

3 groups at inception \*\*\*:  
• Onerous  
• Profitable with no significant risk of becoming onerous; and  
• Other profitable contracts

Risk of contracts becoming onerous:  
• Internal reporting  
• Sensitivity of fulfillment cash flows

Requires that a group shall not include contracts issued more than one year apart

### 4. Effect of regulation

Some laws or regulations prevent insurers from pricing for certain risk indicators (e.g., gender)

If a law or regulation specifically constrains  
• insurer's practical ability to set a different price or level of benefits for policyholders with different characteristics  
• then ignore that characteristic for grouping (e.g., male or female drivers)

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## The requirements

### What are the requirements?

A portfolio of insurance contracts are contracts

- Subject to similar risks
- Managed together as a single pool.

And then apply grouping below the portfolio: A group of contracts

- That are onerous at initial recognition,
- That at recognition have no significant possibility of becoming onerous.
- Remaining contracts in the portfolio.

An entity shall not include contracts issued more than one year apart in the same group.

Note that aggregation occurs on inception and that it never changes.  
Note that the IFRS 17 OCI option can be elected at portfolio level.

### Example:

Portfolio 1			Portfolio ...			Portfolio x		
Onerous	Profitable	Insolvent	Onerous	Profitable	Insolvent	Onerous	Profitable	Insolvent
Yr 1	Yr 1	Yr 1	Yr 1	Yr 1	Yr 1	Yr 1	Yr 1	Yr 1
Yr 2	Yr 2	Yr 2	Yr 2	Yr 2	Yr 2	Yr 2	Yr 2	Yr 2
Yr x	Yr x	Yr x	Yr x	Yr x	Yr x	Yr x	Yr x	Yr x

Total duration > 1 year  
Duration of 1 year or less

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## Level of Aggregation - Guidance - Paragraph 24

An entity shall apply the recognition and measurement requirements of IFRS 17 to the groups of contracts issued determined by applying paragraphs 14–23. An entity shall establish the groups at initial recognition, and shall not reassess the composition of the groups subsequently. To measure a group of contracts, an entity may estimate the fulfillment cash flows at a higher level of aggregation than the group or portfolio, provided the entity is able to include the appropriate fulfillment cash flows in the measurement of the group, applying paragraphs 32(a), 40(a)(i) and 40(b), by allocating such estimates to groups of contracts.

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### Level of Aggregation - To What Degree does it Really Matter?

- Regardless, because of Paragraph 24, companies may utilize the same (or very similar) reserve segmentation as is used today under US GAAP.
- Allocation based on unit of account needed if:
  - General model – CSM determination and amortization
  - Onerous contracts – recognition of loss in P/L
  - Presentation of groups in asset vs. liability positions
- When is allocation back to unit of account not needed?
  - PAA eligible
  - Not onerous

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### Why is it so important?

#### Profit emergence

- For general model groupings, CSM is calculated at the group level. For PAA groupings, profit emergence considers seasonality within a group. Therefore, the level of aggregation is one of the key drivers of profit emergence
- Enhanced granularity could have adverse financial impacts resulting in potentially more onerous contracts. Losses on onerous contracts are recognised immediately in P&L
- Losses due to unfavorable assumption updates could be recognised faster under IFRS 17 than under IFRS 4. IFRS 4 allows a higher level of aggregation for Liability Adequacy Testing (LAT)

#### Operational considerations

- Level of aggregation requirements will result in operational challenges for adopters. New capabilities and enhancements to the data and systems architecture will be required to store and process large volumes of data
- Maximising the number of contract groupings that qualify for PAA can reduce operational complexity

#### Financial reporting impacts

- Decisions on the level of aggregation will impact valuation, but also financial reporting and disclosure requirements. A particular reporting challenge is that groups of contracts in an asset position are not offset by those in a liability position
- The appropriate level of aggregation will result in better information on performance, profitability and drivers of change providing management the ability to make well informed decisions

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### Questions for Audience

What is the term for a group of contracts where expected cash outflows exceed expected cash inflows?

- Onerous
- Deficient
- Negative
- Adverse

A group should not include contracts written more than how many years apart?

- 1
- 2
- 3
- 5

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# 5 Ceded Reinsurance

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**Reinsurance contracts**  
Introduction

```

    graph LR
      Policyholder[Policyholder] -- Premiums --> Insurer[Insurer]
      Insurer -- Claims --> Policyholder
      Insurer -- Premiums --> Reinsurer[Reinsurer]
      Reinsurer -- Claims --> Insurer
  
```

- Insurance contract held.
- Insurance contract issued
- Reinsurance contract held
- Reinsurance contract issued

**Accounting:**

- Reinsurance contracts issued = Insurance contracts issued
- Reinsurance contracts held => Special requirements

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**Overview & Challenges**

**Reinsurance contracts issued (i.e., assumed) = insurance contracts issued**

- Note that ceding commissions are netted against premiums, with the net amount treated as revenue under the contract
- Investment components and certain other cash flows are accounted for on a net basis

**Reinsurance contracts held (i.e., ceded reinsurance) -> special requirements**

- F/S presentation is gross (i.e., not netted on the balance sheet or the income statement), thus measurement (& other considerations) are separate for ceded reinsurance.
- This can create challenges:
  - Consistency with gross cash flows - level of aggregation, contract boundary, measurement model, CSM release pattern (if General Model), onerous contract measurement
  - Risk attaching contracts, even when the underlying contracts have coverage periods of 1 year or less, would need to be tested for PAA eligibility
  - Investment components and net presentation of certain other cash flows – identification, measurement, tracking
  - Program structures with special considerations for net impacts

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## Reinsurance contracts

Measurement and recognition

### Initial recognition date

- Non-Proportional Reinsurance
  - When the coverage period of the reinsurance contract begins, or when the entity recognizes an onerous group of underlying contracts (if the reinsurance contract was entered into before that date), whichever is earlier
  - Proportional reinsurance
    - As above, except never before the first underlying insurance contract is recognized.

### Onerous gross insurance contracts

- When a loss component is booked on gross insurance contracts underlying ceded reinsurance contracts held, a ceded loss recovery component is measured by multiplying the underlying gross loss component by the percentage of gross claims expected to be recovered from the reinsurer

### Cash flows measurement

- Assumptions consistent with underlying insurance contracts
- Non-performance risk affects cash flows.
- Risk adjustment needs to reflect risk transferred to reinsurer (for held contracts)

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## Reinsurance

Why reinsurance is an issue?

### Some IFRS 17 'basics' are a challenge for reinsurance

There are some basic reasons as to why reinsurance is more challenging to value in the IFRS 17 world, and it is not all down to IFRS 17 requirements. It has a lot to do with how we do things today.

IFRS 17 requirement	What we do under IFRS 4	Implementation issue
Reinsurance held asset/liability must be valued (and shown) separately.	We present our results net of reinsurance.	Companies may not have the data or processes set up to do the reinsurance held at the level of granularity required.
Valuation must be at a unit of account level which reflects the profitability of the contracts (insurance and reinsurance).	We aggregate, mixing loss making and profitable contracts.	Companies may not have the data or processes set up to do the reinsurance calculations separately for reinsurance held at the level of granularity required.
Gains are spread over the coverage period, while losses are recognised immediately.	We apply this requirement at the net of reinsurance level.	Companies will have to apply this requirement at the unit of account level and separately for reinsurance. For example, we will have to recognise gross losses up front, but defer an associated loss recovery component corresponding to a reinsurance policy.

In addition, there are some IFRS 17 requirements on the models that can be used, the calculation of the CSM and specific reinsurance requirements that mean a generic/automated approach to valuing reinsurance contracts will be more challenging.

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## Reinsurance

Why reinsurance is an issue?

### Examples of potential differences and mismatches

Feature	Impact
Underlying measured using PAA	• Risk attaching reinsurance will not automatically be eligible for PAA, even when the underlying contracts are automatically eligible.
Loss component recognition	• Losses from 'Loss'-making underlying contracts need to be recognised immediately, but any off-setting profit from reinsurance needs to be deferred.
Multiple underlying units of account	• Multiple underlying units of account feed fully or partially into a single reinsurance unit of account (assuming no separation) – Wide-ranging implications.

(\*) Subject to change following July 2019 Exposure Draft

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## Reinsurance

Why reinsurance is an issue?

### Examples of potential differences and mismatches (cont'd)

Feature	Impact
CSM amortisation	<ul style="list-style-type: none"> <li>Potential for different reinsurance and underlying CSM amortisation profiles due to different recognition dates, exposures, locked-in rates, coverage periods, interactions when unlocking etc.</li> </ul>
Reinsurance valuation needs to allow for future new underlying business.	<ul style="list-style-type: none"> <li>CSM will rely on estimated future business volumes, which may have little relation to actual underlying business.</li> </ul>
Complex contracts with addenda	<ul style="list-style-type: none"> <li>Careful consideration of the detailed terms of the contract is required (e.g. new risk, past/future events etc.)</li> <li>Addenda may not meet the requirement to be treated as separate units of account making valuation more complex.</li> </ul>
Retrospective reinsurance	<ul style="list-style-type: none"> <li>Ceded contract boundary is the claim settlement period regardless of the underlying gross coverage periods.</li> </ul>

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## Investment Components

(Net Cash Flows)  
What are They?

Examples:

- Reinstatement premium (mandatory)
- Ceding/profit commissions
- Retrospectively rated contracts

- An investment component represents the amounts that an insurance contract requires the Company to repay to the policyholder even if an insured event does not occur.
- If an investment components is **not distinct** then it is accounted for under IFRS 17, but the income statement – both revenue and incurred expense – is net of the impact. This net treatment is the same for cash flows that based on premiums and losses and are settled net (such as mandatory reinstatement premiums).
  - Mandatory reinstatement premiums are netted against losses and not considered premium revenue or expense.
  - Profit commissions are typically accounted for in a manner similar to deposits.
  - Sliding scale commissions have a similar impact under IFRS 17.
- If an investment component is **distinct**, then should be separated from the host insurance contract and accounted for under IFRS 9; typically observed with certain life contracts.

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# 6

## Transition

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### Transition

- Effective date is 1 January 2023, but at least one year of comparative numbers required
- Transition is retrospective, so historic data is required.
- Transition is aimed at determining the CSM on the transition date.
- Impact of transition is recognized in opening equity

Approach:

**Full retrospective approach**  
 When historical data exists and hindsight is not required

↓

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If impracticable

**Modified retrospective approach**  
 When not all historical information is available but information about historical cash flows is available or can be constructed

**Measurement at fair value**  
 When no historical information about cash flows is available to determine the CSM

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### Transition Approaches

Required for annual reporting periods beginning on or after 1 January 2023 (applied to in-force policies starting 1 January 2022).

1 Full retrospective	2 Modified retrospective	3 Fair value
<ul style="list-style-type: none"> <li>• At transition, each group of insurance contracts (Unit of Account) should be reported as the sum of the fulfillment cash flows (including onerous contract liability if required), risk adjustment and CSM.</li> <li>• Current CSM = initial CSM at inception and adjusting it to reflect the experience until the transition date at locked-in rates.</li> <li>• Capture the cumulative amount of insurance finance income or expenses recognised in other comprehensive income at transition.</li> </ul>	<ul style="list-style-type: none"> <li>• Closest outcome to full without undue cost or effort</li> <li>• Allowed to adopt each simplification below only if there is insufficient data:                             <ul style="list-style-type: none"> <li>– Grouping of contracts (e.g. more than one underwriting year).</li> <li>– Use of yield curves (e.g. discount rate specified as of Transition instead of at inception of contract).</li> </ul> </li> <li>• Cash Flows estimated at inception = FCF at Transition, adjusted by CF known to have occurred since inception.</li> <li>• Risk Adjustment estimated at inception = RA at Transition, adjusted by expected release based on other similar contracts.</li> <li>• Approach to capture cumulative impact in other comprehensive income at transition.</li> </ul>	<ul style="list-style-type: none"> <li>• IFRS 13 market participant price to transfer the asset or liability = FV at Transition.</li> <li>• Fulfilment CF and risk adjustment liabilities measured based on IFRS 17 measurement approach at Transition date.</li> <li>• CSM balance or loss component at Transition is set as the difference of the above 2 items.</li> <li>• Fair value could be derived by adjusting IFRS 17 fulfilment and risk adjustment liabilities to reflect a market participants viewpoint and include other non-attributed expenses that a market participant would expect to be covered by the premium.</li> <li>• Not required to separate contracts into underwriting year.</li> </ul>

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Practical implementation

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### Presentation and disclosure

Key changes in reporting insurance contracts

**1**

**Income statement**

- IFRS 17 tries to align the presentation of revenue with other industries.
- Investment components and net investment income are exclude from the underwriting result and presented as a separate line item.
- Investment result includes investment income and the discounting of the insurance liabilities
- IFRS 17 provides an accounting policy choice to recognise the impact of changes in discount rates in profit or loss or in other comprehensive income (OCI)

**2**

**Balance sheet**

- IFRS 17 estimates are re-measured in each reporting period.
- The measurement is based on the building blocks of discounted, probability-weighted cash flows, a risk adjustment, and a contractual service margin (CSM).
- Separate lines for:
  - Insurance contract assets and insurance contract liabilities
  - Reinsurance contract assets and reinsurance contract liabilities
  - No separate lines for insurance payables/receivables, policy loans, etc.

**3**

**Insurance contract revenue**

Insurance contract revenue replaces premiums

Calculated under the GMM as the sum of:

- Expected change in cash flows from claims and expenses (As at the beginning of the year).
- Change in risk adjustment.
- Amortisation of contractual service margin.
- Amortization of acquisition costs.

**4**

**Disclosures**

- IFRS 17 disclosures are more detailed than required under current reporting frameworks, providing additional insight into key judgements and profit emergence and thus allowing for greater comparability across entities.
- Significantly expanded granular reconciliations of changes in each component of insurance contract assets and liabilities, including margins.
- Confidence level of insurance liabilities.

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### Presentation and disclosure

Disclosure

Under IFRS 17 more disclosures will be required compared to IFRS 4

Amounts	Judgements	Risks
<p><b>Balance sheet</b></p> <ul style="list-style-type: none"> <li>Present value of probability-weighted estimated value of future cash flows</li> <li>Risk adjustment</li> <li>Contractual service margin for general model and VFA</li> <li>Liability for the remaining coverage (PAA)</li> </ul> <p><b>Income statement</b></p> <ul style="list-style-type: none"> <li>Underwriting revenue</li> <li>Underwriting expense</li> <li>Finance income/expense</li> </ul>	<ul style="list-style-type: none"> <li>Measurement methods</li> <li>Processes for estimating the inputs</li> <li>Changes in methods and processes</li> <li>Methods used to calculate finance income/expense if OCI option is used</li> <li>Confidence level for risk adjustment measurement</li> <li>Yield curves</li> </ul>	<ul style="list-style-type: none"> <li>Nature and extent of risks</li> <li>Exposure</li> <li>Procedures used to manage risks</li> <li>Concentration of risks</li> <li>Insurance risk: sensitivity analysis, claims development</li> <li>Credit risk</li> <li>Liquidity risk: maturity analysis by estimated timing of cash flows</li> <li>Market risks:                             <ul style="list-style-type: none"> <li>Interest rate risk</li> <li>Foreign currency risk</li> <li>Prices risk</li> </ul> </li> </ul>

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### Presentation and disclosure

How will IFRS 17 impact insurance results?

The new requirements will significantly impact performance measures including top line revenue and the timing of earnings.

**Revenue**

- Timing of revenue is no longer based on premiums received.
- Revenue is determined based on the change in the liability for insurance coverage during the period.
- The portion of premiums related to cash values/surrender values are excluded from revenue.

**Onerous contracts**

- Less making (onerous) contracts are grouped separately at inception.
- Losses are recognised immediately through the P&L.
- No offsetting with profitable contracts, more losses are expected to be recognised.
- Losses recognised for onerous contracts are offset by gains from reinsurance contracts

**Timing of earnings**

- Profits no longer recognised at inception.
- Profits are deferred in the contractual service margin and earned over the life of the contract.
- Subsequent changes in assumptions for future coverage are not recognised immediately, but over the remaining coverage period.

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**Presentation and disclosure**  
Statement of financial position – Example

Assets (Currently)	Assets (New under IFRS 17)	Separate presentation of group of insurance contracts in an asset and liability position
Cash and cash equivalents	Cash and cash equivalents	Separate presentation of group of insurance contracts in an asset and liability position
Financial investments	Financial investments	
Segregated fund assets	Segregated fund assets	
Accrued investment income	Accrued investment income	
Investment property	Investment property	Ceded reinsurance contracts are presented separately from insurance contracts
Investments in associates	Investments in associates	
Receivables from insurance business	Receivables from insurance business	
Reinsurance assets	Insurance contracts assets <sup>1</sup>	DAC, PVF and premium receivable are not separate assets but part of fulfillment cash flows
Deferred acquisition costs (where applicable)	Reinsurance contracts assets <sup>1</sup>	
Property and equipment	Property and equipment	
Goodwill and other intangible assets	Goodwill and other intangible assets	Total assets
Deferred income tax assets	Deferred income tax assets	
Current income tax assets	Current income tax assets	
Other assets	Other assets	
<b>Total assets</b>	<b>Total assets</b>	no changes to presentation
<sup>1</sup> including non-distinct investment and service components		

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**Presentation and disclosure (continued)**  
Statement of financial position – Example

Liabilities and equity (Currently)	Liabilities and equity (New under IFRS 17)	Separate presentation of insurance contracts in an asset and liability position
Insurance contract liabilities	Insurance contracts liabilities <sup>1</sup>	Separate presentation of insurance contracts in an asset and liability position
Insurance accounts payable	Reinsurance contracts liabilities <sup>1</sup>	
Investment contract liabilities	Investment contract liabilities	
Employee benefit obligations	Employee benefit liabilities	Ceded reinsurance contracts are presented separately from insurance contracts
Derivative liabilities	Derivative liabilities	
Deferred tax liabilities	Deferred tax liabilities	
Other liabilities	Other liabilities	
Senior debentures	Senior debentures	Insurance payables are not separate liabilities but part of fulfillment cash flows
Subordinated debt	Subordinated debt	
Segregated fund liabilities	Segregated fund liabilities	
<b>Total liabilities</b>	<b>Total liabilities</b>	Total liabilities and equity
Issued share capital and contributed surplus**	Issued share capital and contributed surplus	
Retained earnings and accumulated OCI**	Retained earnings and accumulated OCI	
<b>Total Equity</b>	<b>Total Equity</b>	
<b>Total liabilities and equity</b>	<b>Total liabilities and equity</b>	no changes to presentation
<sup>1</sup> including non-distinct investment and service components		

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**Overview of IFRS 17 Financial Statements**  
**Income Statement**  
Insurance Liabilities remain a significant portion of the total liabilities.

Income statement (Sample current presentation)	Revenue consists of the following:
Revenue	Expected claims and benefits <sup>1</sup>
Premiums gross	Expected expenses
Less ceded	Acquisition cost amortization
Net premium	Release of risk adjustment
Net investment income (loss)	Amortization of CSM
Interest and other investment income	Premiums due or written prohibited.
Fair value and foreign currency change on assets and liabilities	
Net gains (losses) on available-for-sale assets	
Fee income	
<b>Total revenue</b>	
Benefits and expenses	
Gross claims and benefits paid	Insurance contract revenue
Increase (decrease) in insurance contract liabilities	Insurance contract revenue ceded to reinsurers
Decrease (increase) in reinsurance assets	Claims and benefits incurred
Increase (decrease) in investment contract liabilities	Claims and benefits ceded to reinsurers
Reinsurance expense (recovery)	Expense incurred
Commissions	Expense ceded to reinsurers
Net transfer to (from) segregated funds	Amortization of acquisition costs
<b>Other expense</b>	Other expense
Other expense	
<b>Total benefits and expenses</b>	
Investment income	Investment income
Change in investment contract liability	Investment gain
<b>Profit or Loss</b>	
Net income (loss) attributable to participating policyholders	Other comprehensive income (of discount)
Preferred shareholders dividend	Change in the contract liabilities due to discount rate
<b>Comprehensive Income (Loss)</b>	Change in FVOCI assets
no changes to presentation	

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# 8 Other Topics

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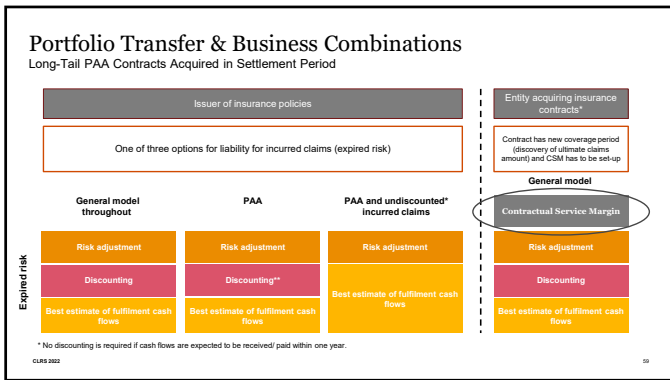
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### Fronting Arrangements - Questions to Ask

Fronting (where one party is writing business and ceding substantial majority to another party) sometimes involves two insurance companies, sometimes reinsurer is a captive owned by a manufacturer, sometimes government backed programs (National Flood) where insurers write the policies but cede 100% to government for a fee (paid to the insurers for writing the business).

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### Fronting Arrangements - Questions to Ask

- What's the substance?
  - Fully fronted business – assuming company owns/controls the business – how does the ceding company account for the transactions?
  - Wholly owned corporate captive – insurance company provides direct coverage to the corporation, then cedes the primary layer to the captive – how does the insurance company account for these transactions?
- Key items to resolve:
  - What is the role of the insurance company? That is, **is the insurance company acting as an insurer or an agent providing some other type of service?**
  - If there are multiple contracts between the same entity, do these need to be accounted for on a combined (i.e., net) basis?
- A key considerations include the legal rights and obligations if the reinsurer does not pay, – is the insurer on the hook if the reinsurer can't pay?
  - If not on the hook – then insurer is likely just **acting as an agent, and the fronting fee falls under IFRS 15** (revenue recognition)
  - Many corporate captive arrangements may be accounted for on a net basis

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### Modification and derecognition

#### Summary

- **Modification** – Amendment to an insurance contract.
  - Exercise of rights under original terms is NOT a modification.
  - Can result in derecognition, otherwise treated as a change in estimate.
- **Derecognition** – Extinguishment, transfer or modification.
  - Extinguishment – Obligation expires, is discharged or cancelled.

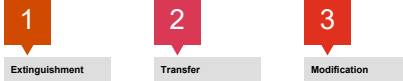
#### Fulfillment cash flows

The present value of the **future cash flows** and the **risk adjustment for non-financial risk** that relate to the contract that is derecognised are eliminated.

#### Number of coverage units

The number of coverage units for the expected remaining coverage is adjusted to reflect the coverage units extinguished.

#### Adjustment of the CSM – Different requirements for:



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# 9

## Questions?

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