

Chuck's 5 Minute Pessimistic View of ORSA

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ORSA Confidentiality

- Prevents any comparison:
 - Who is reporting
 - What they are reporting
 - If it is meaningfully different from other reporting requirements



Is ORSA really necessary?

- SIFI
- Rating Agencies
- MD&A
- SEC Filings (if public)
- Enterprise Risk Report Form F
- ORSA



Is it realistic to expect:

- New information in ORSA that is not already reported elsewhere
 - If an insurer is not adequately reporting risk in these other reports, why do it here?
 - Is confidentiality enough to spur honesty?
- Insurers to start behaving differently because of ORSA



Enterprise Risk Report (Form F) vs. ORSA Summary Report

- Both are intended to provide information on material risks to the group/enterprise
- Material risk is defined differently, ORSA intended to provide more on ERM framework
- If Enterprise Risk Report is not adequate, why not just fix that, why add a layer?