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Beyond IFRS 4 Insurance Contracts Project

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Measure contract at initial recognition Future cash flows

Measurement of an insurance contract incorporates all available information, in a way consistent with observable market information.

Future cash flows expected cash flows from premiums, claims and benefits An <u>explicit</u>, <u>unbiased</u> and <u>probability-weighted</u> estimate of future cash flows that will arise as the insurer fulfils the insurance contract



Measure contract at initial recognition Future cash flows

Recognition: Contract starts when coverage period begins (may be after insurer is on risk) unless contract is onerous



Included in cash flows: All direct costs of *originating* and all directly attributable costs incurred in *fulfilling* insurance contracts

Contract boundary:

Contract ends when:

- Not required to provide coverage
- Can reprice to reflect risks of policyholder
- Or, In some cases, to reflect risk of portfolio
- On substantial modification



Measure contract at initial recognition Fulfilment cash flows: mutualisation

In some contracts or contract types, other policyholders form first layer of risk absorption. In such cases:

- Expected cash flows from/to participating policyholders are part of the fulfilment cash flows of the primary policyholders: A group of policies is not considered to be onerous if another set of policyholders bears those losses
- Losses are only recognised in profit or loss from onerous contracts when the underlying items in the fund as a whole are insufficient to bear those losses, ie when no other policyholder has the capacity to absorb those losses



Mutualisation Guidance

- <u>No specific guidance</u> for mutualisation
- Mutualisation is inherent in the cash flows guidance, and consequently is subject to <u>that</u> guidance
- Thus, included in cash flow of individual policyholder are:
 - Expected future cash flows to any other policyholder, or
 - Expected future cash flows from any other policyholder
- But mutualisation is <u>not</u>:
 - diversification of risk or cross subsidisation or discretion
- Requires explicit right of the insurer to act:
 - To the detriment of one policyholder;
 - To fund loss of another policyholder (or visa versa)



Mutualisation Level of determination

- Expected cash flows from/to participating policyholders are part of the fulfilment cash flows
 - In determining present value of future cash flows, it is irrelevant whether determined at individual or group level
 - Entity includes cash flows which come from or go to other policyholders as part of present value determination
 - <u>Cash flows are cash flows</u> (doesn't matter where from, so across portfolios is acceptable)
- Level of aggregation important for CSM determination only, but is determined <u>after</u> determination of cash flows, thus:
 - Level of aggregation does not affect mutualisation
 - Mutualisation may affect level of aggregation



Mutualisation Level of determination

 Thus first determine expected cash flows, including cash flows to other policyholders, and cash flows from other policyholders (level of aggregation not relevant),

Then

- Determine level of aggregation, and
- Determine at inception CSM,

Thereafter

- Maintain the level of aggregation (no reassessment) and
- <u>Remeasurements of cash flows</u> include cash flows to and from other policyholders, and if they relate to future services, adjust CSM



Mutualisation Examples

- Most obvious mutualisation between policyholders sharing same pool of assets, and same generation, for example:
 - Two policyholders (A & B) share in same underlying items, but A has higher guarantee
 - B shares in residual of underlying <u>after</u> A's guarantee settled
 - B is subsidising A there is mutualisation
- Can also occur across generations, for example:
 - Returns on underlying assets accumulate, but are not paid out to current generation of policyholder (generation C)
 - Instead accumulated as obligation to future generation (D)
 - There is consequently mutualisation between C and D



Mutualisation Examples

- Mutualisation can also occur across product lines, for example:
 - Product E participates in the return on an underlying product line, product F
 - In determining the expected cash flows of E, entity must consider cash flows to and from F
 - In determining the expected cash flows of F, entity must consider cash flows to and from E



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Level of aggregation



Measure contract at initial recognition Fulfilment cash flows

Measurement of an insurance contract incorporates all available information, in a way consistent with observable market information.

'Fulfilment cash flows'

Future cash flows

Discounting

Risk adjustment

Fulfilment cash flows is a probability-weighted, risk adjusted, estimate of the present value of cash inflows and outflows that will arise as the entity fulfils the contract.



Measure contract at initial recognition Fulfilment cash flows: Level of aggregation

Level of aggregation is **<u>not</u>** relevant for:

- Determination of fulfilment cash flows
 - Present value is consistently applied irrespective of level of application
- Determination and allocation of directly attributable expenses
 - Allocation based on nature and 'attribute-ability' of costs
- Determination and allocation of risk margin
 - Based on entity approach to determining compensation for risk



Measure contract at initial recognition Contractual Service Margin (CSM)

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Measurement of an insurance contract incorporates all available information, in a way consistent with observable market information.

Contractual service margin

'Fulfilment cash flows'

Future cash flows

Discounting

Risk adjustment

Contractual service margin is measured as the <u>positive</u> (net inflow) difference between the riskadjusted present value of expected inflows and outflows at inception.

Fulfilment cash flows is a probability-weighted estimate of cash inflows and outflows that will arise as the entity fulfils the contract.



Measure contract at initial recognition CSM

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- CSM is determined as the risk adjusted present value of <u>all</u> the cash inflows and outflows (<u>including</u> mutualised cash flows)
- As such, at inception it captures the expected profitability of the contract over its entire expected life
 - If contract expected to be loss making, CSM is 'negative' and recognised in profit or loss (<u>onerous contract</u>)
 - If contract expected to be profit making, CSM is 'positive' and recognised as a liability (<u>unearned profit</u>)
- At inception, CSM is <u>not</u> a cash flow, instead it is the inverse of other cash flows



Measure contract at initial recognition CSM: Onerous contracts

- Loss for onerous contracts should be recognised only when the contractual service margin is negative for a group of contracts, and that group should comprise contracts <u>that at</u> <u>inception</u> have:
 - Cash flows entity expects will respond in similar ways to key drivers of risk in terms of amount and timing <u>AND</u>
 - Similar expected profitability (ie similar contractual service margin as a percentage of the premium)
- Within group, <u>net off the negative and positive CSM</u>
- <u>Model is asymmetric</u>
- Group not reassessed after inception



Subsequent remeasurement CSM: Onerous contracts

- Loss for onerous contracts should be recognised only when the contractual service margin becomes negative for a group of contracts, and that group should comprise contracts <u>that</u> <u>at inception</u> have:
 - Cash flows entity expects will respond in similar ways to key drivers of risk in terms of amount and timing <u>AND</u>
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- Within group, <u>net off the negative and positive CSM</u>
- <u>Model is asymmetric</u>
- Group not reassessed after inception

Subsequent remeasurement CSM: Allocation

- Objective for adjustment and allocation of CSM is that CSM at end of reporting period represents profit for future services for a group of contracts
- The group is the same as that for deciding when contracts are onerous
- Allocation should reflect expected duration and size of contracts remaining in the group



Importance of aggregation Why aggregate

- Model is asymmetric
 - This causes different outcomes for grouped and individual contracts
 - For example,
 - entity has 2 contracts, based on data at inception are identical
 - after inception, Contract A becomes onerous (CSM = -CU10), while the contract B remains as expected (CSM = +CU20).
 - If accounted individually level, loss on A recognised immediately, profit on B spread over its life,
 - if grouped, A set off against B, smaller profit spread over life
- Nature of insurance is to aggregate risks
- Operationally, insurers use a myriad of different levels of aggregation
 IFRS

Importance of aggregation Why limit aggregation

- Loss of transparency of information
 - Insight into loss making activities, cohorts, or products
 - Timing of loss recognition shielded by profitable business
 - Timing of profits over contract life (allocation)
 - At extreme, no losses until entire entity loss making
- Current inconsistency of application
 - Not generally defined in National GAAPs, or regulatory frameworks
- Consistency within IFRS
 - Revenue, leases and impairment all allow grouping, but only in very limited circumstances



Importance of aggregation Why more generous for Insurance

- Level of aggregation guidance allows considerably fewer groups then would be the case for equivalent guidance for Impairment/revenue/leases
- Those standards prohibit the setting off of onerous contracts against profitable contracts in the absence of contractual link BUT in balancing reasons for and against
- Board maintains importance of transparency, but
- Board accepts that insurance is different
 - Risk Aggregation
 - Longer term contracts



Measure contract at initial recognition CSM: Effect of regulation

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- No exception to the level of aggregation for determining onerous contracts or the allocation of the contractual service margin when regulation affects the pricing of contracts
 - Contracts that <u>do not have similar</u> profitability, even if as a consequence of regulation, may not be aggregated for determining onerous contracts
 - Normal test applies
 - Regulation does not change the economics of the contracts, aggregation based on economics of the contracts





