

Comments Template on EIOPA-CP-14-60 Draft proposal for Implementing Technical Standards with regard to standard deviations in relation to health risk equalisation systems		Deadline 02.Mar.2015 23:59 CET
Company name:	Insurance and Reinsurance Stakeholder Group (IRSG)	
Disclosure of comments:	EIOPA will make all comments available on its website, except where respondents specifically request that their comments remain confidential. Please indicate if your comments on this CP should be treated as confidential, by deleting the word Public in the column to the right and by inserting the word Confidential.	Public
<p>Please follow the instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ <u>Do not change the numbering</u> in column "Reference". ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a paragraph, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific paragraph numbers below. <ul style="list-style-type: none"> ○ If your comment refers to multiple paragraphs, please insert your comment at the first relevant paragraph and mention in your comment to which other paragraphs this also applies. ○ If your comment refers to sub-bullets/sub-paragraphs, please indicate this in the comment itself. <p>Please send the completed template to Consultation_Set2@eiopa.europa.eu, in MSWord Format, (our IT tool does not allow processing of any other formats).</p> <p>The paragraph numbers below correspond to Consultation Paper No. EIOPA-CP-14-060.</p>		
Reference	Comment	
General Comment	<p>There is insufficient transparency in how the standard deviations for premium and reserve risk are derived. The details of the calculation and any adjustments which have been made should be disclosed in a Technical Annex.</p> <p>Updated parameters should be provided sufficiently in advance for health insurers in order to use them in their pricing. It is unclear whether this estimate of the standard deviation must be updated annually: it would be appropriate an update every 1 or 2 years, followed by a detailed calibration analysis, that allows to maintain a long term consistency.</p>	

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Article 1		
Article 2		
Impact Assessment		
Appendix I		
Appendix II		