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Memorandum

To: All members of the Canadian Institute of Actuaries, and other interested parties

From: Edward Gibson, Chair
Actuarial Standards Board

Dominic Bourbonnais, Chair
Designated Group

Date: March 25, 2024

Subject: **Notice of Intent: Review of Standards of Practice with Respect to Gender Identity**

Comment deadline: May 15, 2024

Document 224036

Introduction

The Actuarial Standards Board (ASB) has established the Designated Group on Gender Identity (DG) to review the CIA's *Standards of Practice* (Standards) with respect to gender identity.

Mandate of the DG:

- Using the *Final Report – Gender Identity Task Force* as a starting point, clarify in the *Standards of Practice* where the actuary is setting or using assumptions or collecting or using data where there may currently be ambiguity with respect to whether the assumptions or data are sex at birth or gender.
- Clarify in the *Standards of Practice* where terminology related to sex at birth or gender is used such as “sex,” “unisex,” “male,” “female,” “hommes,” “femmes,” etc. to use more appropriate language.
- Identify in the *Standards of Practice* where emerging practices regarding usage of sex at birth or gender information (or an absence of such information) for actuarial work may require additions, modifications, or discontinuations in the text.
- Update language in the *Standards of Practice* to reflect gender-neutral terminology and inclusive language as set out in the *CIA Style Guide*.
- Liaise with the Actuarial Guidance Council's gender identity working group to encourage consistency.

This notice of intent (NOI) outlines changes under consideration during this review and requests feedback on the revisions as part of the formal due process for amending Standards. Other changes may be identified as the process unfolds for which the membership will have an opportunity to comment at later stages.

This NOI uses two definitions consistent with those adopted by Statistics Canada,¹ namely:

- “Sex at birth” – refers to the sex assigned at birth based on a person’s reproductive system and other physical characteristics.
- “Gender” – refers to an individual’s personal and social identity as a man, woman or non-binary person. It is a multidimensional concept influenced by several factors, including cultural and behavioural norms and is self-identified by individual.

Changes to the Standards that are under consideration

1. Replace all references of “his or her,” “himself or herself” and “he or she” with more inclusive language such as “their,” “themselves” or “the actuary.”
2. Clarify in subsection 1440 that the actuary should have an understanding of the data with respect to “sex at birth” and “gender,” and provide guidance for how to address situations when it is not possible to obtain this understanding.
3. In paragraphs 3530.01 and 3530.11, which reference “male” and “female” in respect of mortality, include considerations where only gender may be available or where there is a lack of information.
4. Provide guidance (in either Part 1000 or directly in Parts 2000, 3000, 4000, 6000 and 7000) in respect of mortality assumptions to include considerations where only gender may be available or where there is a lack of information.

The changes contemplated in points 3 and 4 above may include guidance to specify a “safe harbour” for practice in cases where sex at birth and gender differ or are unavailable.

Timeline

The ASB aims to publish an exposure draft before the end of fall 2024 with the final Standards effective no earlier than June 30, 2025. The ultimate timeline will depend on the feedback received and could vary from these targets.

Desired feedback

The DG and ASB are soliciting feedback on this NOI from members of the CIA and any other interested groups.

Feedback is welcome on the proposals described above as well as the following questions:

1. Are there any specific areas in the Standards where changes should be considered to reflect gender identity?
2. Are there any specific proposals for creating a safe-harbour practice for developing mortality rates for individuals **where only gender may be available or is unavailable**?

Please send comments **by May 15, 2024**, to Dominic Bourbonnais at dominic.bourbonnais@buck.com with a copy to StandardsConsultationNormes@cia-ica.ca. No other forums for obtaining feedback are contemplated at this time.

¹ Statistics Canada. 2022. “[Understanding sex at birth and gender of people in Canada.](#)” *The Daily*. Page 1.

The members of the DG are Dominic Bourbonnais (Chair), Richard Chevalier, Alexandre Filiatreault, Lilach Frenkel, Matthew Garnier, Muhamed Majeed, Khurram Masud and Simon Nelson.

The ASB's due process has been followed in the drafting of this NOI.

EG, DB



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