Momentum Conference - December 2011
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CI - Are we happy following the ABI reviews in recent years?
1st December 2011

Agenda

• Introduction
• Survey results for
  • ABI Review Process
  • TPD
  • Gender Directive
  • Future of CI product
• Conclusion
• Questions
Introduction

- The aim of our presentation was simple:
  - To canvass the views of a range of industry figures to allow us to gauge opinion on a number of current aspects and challenges of CI product design.

Who did we ask?

- Superefficient marketing took on average 7 mins.
- Busy CEOs took on average 11 mins.
- Diligent Underwriters took on average 30 mins.
- Prudent Actuaries took on average 60 mins.
- Claims Assessors??

![Pie chart showing the distribution of responses.](image-url)
Level of experience

- Perhaps, not surprisingly, the people we know tend to be the ones that have been working longest.

![Pie Chart]

- 72% of respondents have 0 - 2 years experience.
- 22% have 3 - 5 years experience.
- 6% have 6 - 10 years experience.
- 0% have > 10 years experience.

ABI Statement of Best Practice

Common format — Generic Terms — Model Wordings

- The ABI believes the Statement of Best Practice continues to achieve its key aims of helping consumers in 3 important ways:
  1. **Security** – provides consumers with the safeguard that appropriate minimum standards of cover are used across the industry.
  2. **Comparability** – makes it easier to compare critical illness (CI) insurance from different insurers.
  3. **Clarity** – helps improve understanding about what each product does, and does not, cover.
What is the key **advantage** of the ABI Statement of Best Practice and the review process?

So the overwhelming majority (3/4) of respondents feel that better understanding is key.

Frankly I don’t think it aids any of these. It is a dog’s breakfast.

Keeps the OFT happy

- Customer understanding: 20%
- Broker understanding: 4%
- Easier comparability on price comparison sites: 4%
- Future proofing thereby promoting cutting edge pricing: 22%
- Other: 50%

What is the key **disadvantage** of the ABI SoBP and the review process?

Key disadvantage is preventing innovation of definitions and product in general.

Discourages innovation and takes the industry in the wrong direction.

- Prevents introduction of severity based products: 18%
- Prevents menu based products: 27%
- Prevents significant product innovation: 39%
- Prevents definition innovation: 11%
- Other: 5%
Comments on ABI Review Process

Free text comments suggest a mixed picture:

• “Frankly it creates as many problems as it solves.”
• “… driven by what the ABI want to do rather than what the offices want to do!”
• “… it locks in the product to a bit of a straightjacket.”
• “… welcome the ABI reviews & the work they've done … I really do see major improvements”
• “… advantages far outweigh any disadvantages.”
• “Without standardisation there would be much greater broker and customer confusion …”

Total and Permanent Disability

• Early products had a core set of ~6 illnesses:
  – TPD generally included as a sweep-up benefit

• TPD claims account for low proportion of CI claims (~3%), but 55% of these are declined.
  – Possible lack of clarity around what constituted TPD as no model definition existed.

• ABI took the opportunity to address the issue in their most recent review.
Total and Permanent Disability

• The new SoBP introduces 5 model definitions for TPD, but no name change.
• These are intended to:
  – Improve clarity about what is/isn’t covered;
  – Help consumers compare policies.
• Model definitions for: Own Occupation, Suited Occupation, Any Occupation, 3 Specified Work Tasks, Unable to Look after Yourself Ever Again.
• “The new descriptive headings and standard definitions will make the scope of TPD cover much clearer”
  
  Nick Kirwan

Total permanent disability – unable [before age x] to do your own occupation ever again

• Loss of the physical or mental ability through an illness or injury [...] to the extent that the insured person is unable to do the material and substantial duties of their own occupation ever again. The material and substantial duties are those that are normally required for, and/or form part of, the performance of the person’s own occupation that cannot reasonably be omitted or modified.
• Own occupation means your trade, profession or type of work you do for profit or pay. It is not a specific job with any particular employer and is irrespective of location and availability.
• The relevant specialists must reasonably expect that the disability will last throughout life with no prospect of improvement, irrespective of when the cover ends or the insured person expects to retire.
• For the above definition, disabilities for which the relevant specialists cannot give a clear prognosis are not covered.
To what extent do you believe the recent TPD review has achieved your objectives?

The majority of respondents are less than satisfied with the recent review.

What would have been your ideal outcome of the TPD review?

More than half of respondents wanted a change to name / definition.
What do you believe is the main reason for the high decline rate of TPD claims?

So over 80% thought that customers poorly understood Total and/or Permanent.

So why did the recent review fail to take the opportunity to address the name of the product?

What do you believe is the main reason for the inclusion of TPD on CI contracts?

The vast majority feel that TPD is added because it is perceived to add value.

But would customers feel the same if they knew the 55% decline rates?
**EU Gender Directive**

- Applies to new insurance contracts concluded after 21 December 2007
- Unisex rates required but Member State opt-out allowed
- Opt-out clause: “Where gender is a determining factor in the assessment of risk based on relevant and accurate actuarial and statistical data then proportionate differences in individual premiums or benefits are allowed”
- Action brought in June 2008 by Test-Achats in the Belgian Constitutional Court → referred to ECJ
- ECJ ruling (1st March) : Opt-out is invalid with effect from 21 Dec 2012
- Must use unisex pricing for new policies from 21 Dec 2012.

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**The Gender Directive - what do you believe is the best solution following the Test Achats ruling ?**

- Live with it and price using aggregate rates
- Design products that appeal to one sex (but available to both)
- Unchanged products, but heavily marketed towards one sex
- Use of proxy rating factors
- Withdraw from the market
- Other
What is the biggest risk now that the ECJ has upheld the Advocate General’s opinion?

- Misestimation of aggregate mix
- Anti-selective lapses
- Increased capital requirements
- Extension of ban to underwriting
- Application to inforce
- Extension to other factors
- Other

How prepared are you for the impact of the potential change to the Gender Directive?

It is comforting to see most offices feel that they are well prepared, especially given other pulls on resources – e.g. Solvency II.

No-one felt they were not aware of or only had vague awareness of the Gender Directive.
What do you consider is the most likely change to the CI product over the next 5 years?

So people are expecting to see tiered benefits / more diseases

More of the same

What do you consider is your preferred change to the CI product over the next 5 years?

But would prefer to see hybrid products (eg with IP)

We sold more CI when customers could understand

Go back to basics and look for a more radical and consumer friendly solution.
Conclusion / Key Messages

- It is recognized that the SoBP aids customer understanding.
- However, this has the consequence of inhibiting significant product innovation.
- There is general dissatisfaction with the outcome of the TPD review, with most respondents favoring a name change.
- There appears to be a good level of preparedness for the Gender Directive, with most concern about misestimating of the aggregate mix and anti-selective lapses.
- Disappointingly there is a clear mismatch between the expected and desired direction of CI over the next 5 years.

Questions or comments?