



Society of Actuaries in Ireland

ACTUARIAL STANDARD OF PRACTICE PRSA-5

PERSONAL RETIREMENT SAVINGS ACCOUNTS AND TRANSFERS FROM OCCUPATIONAL SCHEMES

Classification

Mandatory

MEMBERS ARE REMINDED THAT THEY MUST ALWAYS COMPLY WITH THE CODE OF PROFESSIONAL CONDUCT AND THAT ACTUARIAL STANDARDS OF PRACTICE IMPOSE ADDITIONAL REQUIREMENTS UNDER SPECIFIC CIRCUMSTANCES.

Legislation or Authority

Pensions Act, 1990

Personal Retirement Savings Accounts (Disclosure) Regulations, 2002

Personal Retirement Savings Accounts (Operational Requirements) Regulations, 2002

Application

Any actuary called upon to prepare or advise on the preparation of a certificate or statement as required under section 113(1) of the Pensions Act; or any actuary advising the trustees of a defined benefit pension scheme on providing a statement of benefit as required under section 113(2).

This ASP constitutes the guidance issued by the Society referred to in Articles 5(3), 6(1) and 6(2) of the PRSA Disclosure Regulations. Consequently its provisions apply to the preparation of all certificates and statements as required under section 113(1) of the Pensions Act and the statement of benefit as required under section 113(2).

This ASP does not apply where an occupational pension scheme is in the process of winding-up and the benefits are to be transferred to a PRSA.

Version	Effective from
1.0	06.11.2003
1.1	30.12.2006
1.2	01.11.2010
1.3	02.12.2013
1.4	01.10.2016



Definitions

“*the Act*” means the Pensions Act, 1990

“*ASP*” means Actuarial Standard of Practice

“*Benefits Statement*” means a statement of the benefits that may accrue to the Member from the scheme

“*Certificate*” means a certificate setting out a comparison of the scheme and PRSA benefits

“*the Member*” means the scheme member making the transfer

“*the PRSA*” means the PRSA contract into which the transfer is being considered

“*the PRSA Disclosure Regulations*” means the Personal Retirement Savings Accounts (Disclosure) Regulations, 2002

“*the Scheme*” means the scheme from which the Member is considering making a transfer

“*the Society*” means the Society of Actuaries in Ireland

“*Statement*” means a written statement of the reasons why the transfer might or might not be in the Member’s interest

1 Introduction

1.1 Section 113(1) of the Act requires that, before a transfer from an occupational scheme can be accepted by a PRSA provider, the provider must furnish to the Member, or ensure that an intermediary acting on the provider’s behalf furnishes to the Member, a Certificate and a Statement. Section 113(3) exempts certain transfers from the requirements of section 113(1).

1.2 Section 113(2) obliges the trustees of the scheme providing the transfer to furnish a Benefits Statement to the Member.

1.3 This ASP constitutes the guidance issued by the Society referred to in Articles 5(3), 6(1) and 6(2) of the PRSA Disclosure Regulations.

1.6.1 Any person preparing a Certificate or Statement must ascertain the extent of any general or specific advice issued by the PRSA Actuary for that purpose.

1.6.2 Any person preparing a Benefits Statement must ascertain the extent of any general or specific advice issued by the scheme actuary for that purpose.



- 1.4 The Pensions Authority, under the aegis of the Minister for Social Protection, has responsibility in law for the operation of the Pensions Act. An actuary must therefore, subject to the request or consent of the PRSA provider, intermediary, or the trustees of the scheme providing the transfer, as appropriate, be prepared to explain and justify to the Pensions Authority the advice given which underlies Certificates and Statements issued pursuant to section 113(1) of the Act or Benefit Statements issued pursuant to section 113(2) of the Act.

2. Purpose of the ASP

- 2.1 The ASP has regard to the objective of the Certificate and Statement, which is to provide the Member with a comparison of the potential benefits from the Scheme and the PRSA which is fair, clear and not misleading. Nothing in this ASP is intended to require the Actuary to provide financial advice in the Certificate and Statement to the Member for the purpose of deciding whether to accept the transfer from the Scheme. Nothing in this ASP is intended to limit the information that can be provided to the Member.

3. Basis of calculations

- 3.1 The assumptions underlying the projection of benefits in the Benefits Statement and the Certificate must be consistent with each other.

- 3.2 Where it is necessary to make assumptions about

- (i) the rate of future investment return;
- (ii) the rate of change in consumer prices;
- (iii) the rate of change in future earnings;
- (iv) contribution receipts;
- (v) total deductions to cover expenses and charges;
- (vi) stamp duty or pension levy;
- (vii) the cost of protection benefits,

the assumptions specified in the most recent version of ASP PRSA-2 must be used.

- 3.3 The pre-retirement rate of investment return assumed in projecting the PRSA retirement benefits (before deduction of all anticipated charges) must equal that used in the projection of defined contribution benefits unless there is specific evidence that the asset mix will be changed. Appropriate allowance must be made for the effect of any differences in the deduction of charges from the investment return between the Scheme and the PRSA.
- 3.4 In all cases, it is a requirement to illustrate an initial annual pension amount in the Benefits Statement and Certificate.
- 3.4.1 Where it is necessary to make assumptions about the amount of pension that can be purchased at retirement, the assumptions must be as specified in the most recent version of ASP PRSA-2, except that,



where the rules of the Scheme prescribe a different guaranteed rate of escalation, payment frequency or guaranteed period these rates must be used in the Benefits Statement and the Certificate must be prepared on a consistent basis (see paragraph 5.5).

- 3.4.2 Annuity rates used must reflect the Member's details as far as they are known. Where spouse's and dependants' pensions are to be provided, the annuity rate must be based on the Member's current marital status and number of dependants. If the marital status and/ or number of dependants is not reliably known by the trustees and PRSA provider, they must assume that the Member is married with two dependent children.
- 3.4.3 Benefit Statements and Certificates must contain a note describing the nature of the annuity shown, including the duration or durations of life for which the annuity is payable and any reduction that would apply in the event of a death during this period and also including the assumptions specified in paragraphs 3.4.1.
- 3.4.4 Projections of retirement benefits in the Benefits Statement or the Certificate, whether in cash or annuity form, must show the equivalent figures in present day values by deflating the illustrated figures at the rate specified under the corresponding requirement in the most recent version of ASP PRSA-2.
- 3.5 Where contribution increases are provided in the Scheme, the effect of these must be reflected in the Benefits Statement on the basis of best estimates of the determinant of the increases which are consistent with the assumed investment return, subject to the proviso that the rate of contribution increase assumed must not exceed the rate of deflation required for the purposes of paragraph 3.4.
- 3.6 The Benefits Statement must reflect the current charging basis for expenses, unless there is reason to believe that this will increase in the course of the relevant investment contracts. In particular, any anticipated systematic adjustment in charges to reflect inflation of expenses must be allowed for, using, where necessary, assumptions about the rate of change in consumer prices or the rate of change in general earnings determined in accordance with the provisions of paragraph 3.2. Reduction in charges must not be anticipated, unless these are contractually guaranteed.
- 3.7 Where the Scheme or PRSA invests in life assurance or other financial products it will be necessary to 'look through' to the underlying assets to ensure that all charges and expenses, both implicit and explicit, which the Member will bear are included.



- 3.8 The retirement benefits contribution for some defined contribution schemes is calculated as a gross contribution less the cost of specified risk benefits. In calculating the net retirement contribution, the current charging basis for risk benefits must be used, unless there is reason to believe that the actual charging basis until the Member's Normal Retirement Age will be higher than that currently applicable.
- 3.9 In projecting the retirement benefits on with-profits contracts, the assumed split between future annual bonuses and terminal bonuses may affect projections. This split must be reasonable and justifiable, taking into account the current split and the assumed future investment return. In particular, if a terminal bonus is added, it would not normally be appropriate to assume that there would be no terminal bonus in the future at any of the assumed rates of investment return.
- 3.10 For illustrations of benefits in respect of with-profits contracts, both conventional and accumulating, provided by life assurance companies, and all other contracts where some or all of the charges may not be explicit, the charges for expenses must be determined in accordance with Part III of ASP LA-8.

4 Benefits statement

- 4.1 The Benefits Statement provided by the trustees of the scheme must be in the form set out in Appendix A.
- 4.2 The purpose of the Benefits Statement is to provide sufficient information to enable a clear and fair comparison to be made between the benefits provided by the Scheme and the PRSA. If the trustees believe that providing the statement in the form set out in Appendix A may be misleading, they must provide such additional information as they consider necessary to illustrate the Scheme benefits adequately. If they believe that there is further information that may be relevant to the comparison, they must provide this information in addition to the Benefits Statement.
- 4.3 Where the administration of the Scheme is not under the day to day control of the trustees, but has been delegated by the trustees to a third party administrator or insurance provider, it will normally be the practice for the administrator to prepare the Benefits Statement. In these circumstances, the trustees must get written confirmation that the statement has been prepared in accordance with this ASP.
- 4.4 The Benefits Statement must be prepared on the basis of the most likely future membership status of the Member, which will not always be the same as the current status. If the Member is currently a contributing member but is likely to become a deferred member irrespective of whether contributions will be



made to a PRSA, the Benefits Statement must be prepared assuming paid-up status.

- 4.5 In completing the Benefits Statement, the following assumptions must be made:
- 4.5.1 The Normal Retirement Date is the earliest date at which the member can retire without the employer's consent and, in the case of a defined benefit scheme, without any actuarial reduction. Except in the case of an occupation for which earlier normal retirement is permitted, the Normal Retirement Age has a minimum of 60 years.
 - 4.5.2 Where a defined contribution scheme does not oblige a member to provide a reversionary spouse's or dependants' pension in retirement, a single life retirement pension must be calculated. Where the scheme does provide spouse's or dependants' pension, the projected retirement benefits must allow for the cost of such benefits.
 - 4.5.3 Where a lump sum commutation of some or all of the Member's pension is calculated, the current basis of such commutations must be used. Where the rules of the Scheme provide for a lump sum at retirement which can be converted into an equivalent pension, the pension must be calculated assuming the current basis of conversion. Where such commutation or conversion is not permitted under the rules of the Scheme, the reduced or full pensions must be left blank as appropriate, and a note included to this effect.
 - 4.5.4 Where the Member is currently making additional voluntary contributions to the Scheme, those contributions must be assumed to continue as a constant proportion of gross earnings.
 - 4.5.5 Where the scheme benefits are partially defined benefit and partially defined contribution (for instance in the case of a defined benefit scheme with a defined contribution additional voluntary contribution benefit), the defined benefit and defined contribution benefit projections must both be calculated. Where scheme benefits are calculated as the greater of two benefits (for example a defined benefit scheme with a defined contribution underpin), the greater projected benefit must be illustrated, and a note of the alternative benefit included.

5 Certificate

- 5.1 The Certificate must include the information and be in the form set out in Schedule E of the PRSA Disclosure Regulations.
- 5.2 The table of benefits required under section 1(c) of part 1 of Schedule E of the PRSA Disclosure Regulations must include the information provided by the Scheme in the Benefits Statement.



- 5.3 The PRSA benefits information required under section 1(c) of part 1 of Schedule D of the PRSA Disclosure Regulations must be in the form set out in Appendix B except that, if the PRSA provider believes that providing the statement in this form may be misleading, the PRSA provider must provide such additional information as it considers necessary to illustrate the Scheme benefits adequately.
- 5.4 In preparing the Certificate, the PRSA provider must assume the following:
- 5.4.1 The transfer value paid into the PRSA at the start of the projection must be equal to the Member's transfer value from the Scheme at that date.
- 5.4.2 Where the Benefits Statement is prepared on the basis that the Member is a deferred member of the Scheme, the Certificate must assume no contributions to the PRSA other than the transfer value.
- 5.4.3 The contribution rate on the PRSA will not necessarily be equivalent to the contribution rate on the Scheme. The contribution rate assumed on the PRSA must be a best estimate of the contributions expected under the PRSA.
- 5.5 The PRSA provider must illustrate the pension that can be purchased with the Member's retirement account on the PRSA. The annuity rates assumed must replicate the spouse's and dependants' pension assumed in the Benefits Statement. The rates must also replicate, where reasonable, the features of the annuity available under the Scheme (e.g. guaranteed period, etc.). Where the pension benefits provided under the Scheme are unlikely to be easily replicated in practice (e.g. a pension increasing at the rate of inflation or in accordance with an employer salary scale) the pension projected in the Certificate must be based on a best estimate of the economic value of the benefit, and must not take account of any additional cost arising from the difficulty of matching such a benefit.
- 5.6 In the case where the Scheme is a Defined Benefit Scheme that makes discretionary increases on pensions in payment, the Certificate must show two pension amounts:
- (i) The pension that could be purchased with the retirement account, if the pension is level, and
- (ii) The pension that could be purchased with the retirement account, if the pension is escalating at the assumed pension escalation rate specified in the most recent version of ASP PRSA-2.
- 5.7 If the annuity rate applied in the Certificate is calculated under ASP PRSA 2 section 9.6 then the source of the annuity rate must be recorded in the Certificate.



6 Statement of reasons

- 6.1 The purpose of the Statement is to draw the attention of the Member to significant issues which he or she must consider before deciding whether to transfer from the Scheme to a PRSA. It is not a requirement to recommend a particular course of action.
- 6.2 The Statement must give due weight to the factors which must be considered. The Statement must not favour one or other course of action by the overemphasis, minimising or exclusion of any issue.
- 6.3 The Member must not be assumed to be financially knowledgeable unless there are clear reasons to assume otherwise. Taking account of the background of the Member, the statement must be clear, unambiguous, and free of inappropriate jargon.
- 6.4 The Statement must include all issues which the Member must reasonably consider before making a decision.
- 6.5 The Statement is not required to refer to all differences between the Scheme and the PRSA if they are not material.
- 6.6 The Statement must include reference to all factors listed in part 3 of Schedule E of the PRSA Disclosure Regulations unless there is no material difference in this respect between the Scheme and the PRSA or the provision does not apply to either the Scheme or the PRSA.



APPENDIX A – Benefits Statement

Trustees of occupational pension schemes must supply the following information to the person(s) preparing certificates under Section 113.

General Information

Date of calculation

Full name of the scheme

Normal Retirement Date Assumed

Member Information

Name

Sex

Marital/dependants' status

Date of birth

Salary

Defined Benefit Pension Schemes

Projected Benefits at Normal Retirement Age

Member's pension

Spouse's/dependants' pension

Lump sum option and reduced member's pension

Member contribution rate:

- Current member contribution rate (excluding additional voluntary contributions)
- Member contribution rate under the Scheme rules
- Current member's additional voluntary contribution rate



Benefits upon Early Retirement

The trustees must provide details on the early retirement available to the member. Where such retirement is not subject to a reduction for early payment, the trustees must show the projected benefit at the earliest age at which no such reduction applies and indicate whether such retirement is subject to the consent of the trustees, the company or both. Alternatively, the trustees must provide information on the benefits available to the member at the earliest age before Normal Retirement Age at which they may retire of their own accord. In all other circumstances, the trustees must assume the member would retire 5 years before Normal Retirement Age. In particular, the trustees must provide the following:

Age at early retirement

Is trustee and/or company consent required for retirement?

Member's pension

Spouse's/dependants' pension

Lump sum option and reduced member's pension

The trustees must also provide this information assuming the member left service due to permanent ill-health the day after the date of calculation.

Pension payment information

Pension guarantee period.

Rate of increase in pensions (if guaranteed)

Rate of discretionary increase for each of the last five years.

Benefits on death

The trustees must provide the following information on the benefits available under the Scheme were the member to die on the day after the date of calculation and assuming no change to current membership status:

Refund of any contributions

Lump sum benefit payable

Spouse's and/or dependants' pensions payable

Children's pensions payable

Benefits on leaving service

The trustees must provide the following information assuming the member left service on the day after the date of calculation:



Deferred member's pension at Normal Retirement Date

Deferred spouse's/dependants' pension

Transfer value payable in lieu of deferred pension

Any reductions in the transfer value applied under the Pensions Act 1990 or the Social Welfare Act 2003

Defined Contribution Pension Schemes

Rate of investment return assumed

Projected Benefits at Normal Retirement Age

Member's pension

Spouse's/dependants' pension

Lump sum option and reduced member's pension

Member contribution rate:

- Current member contribution rate (excluding additional voluntary contributions)
- Current employer contribution rate
- Current member's additional voluntary contribution rate
- Details of any increases in employer and/or employee contribution rates under the rules of the Scheme

Benefits upon Early Retirement

The trustees must show the projected benefit available to the member at the earliest age before Normal Retirement Age at which they may retire of their own accord without requiring employer or trustee consent. If consent is always required, the trustees must assume the member would retire 5 years before Normal Retirement Age.

Age at early retirement

Is trustee and/or company consent required for retirement?

Member's pension

Spouse's/dependants' pension

Lump sum option and reduced member's pension



The trustees must also provide this information assuming the member left service due to permanent ill-health the day after the date of calculation.

Pension payment information

Pension guarantee period.

Rate of increase in pension

The trustees must also provide this information assuming the member left service due to permanent ill-health the day after the date of calculation.

Benefits on death

The trustees must provide the following information on the benefits available under the Scheme were the member to die on the day after the date of calculation and assuming no change to current membership status:

Refund of any contributions

Lump sum benefit payable

Spouse's and/or dependants' pensions payable

Children's pensions payable

Benefits on leaving service

The trustees must provide the following information assuming the member left service on the day after the date of calculation:

Transfer value payable

General information

Any investment choices available to the member

Any guarantees or bonuses attaching to investment choices



APPENDIX B – PRSA Projected Benefits

PRSA providers must provide the following information:

General Information

Date of calculation

Normal Retirement Date

Member Information

Name

Sex

Marital/dependant's status

Date of birth

Salary

Projected Benefits at Normal Retirement Age

The value of the member's retirement account

Maximum amount available as a tax-free lump sum.

Member's pension

Spouse's/dependant's pension

Lump sum option and reduced member's pension

Assumed contribution rate:

- Member contribution rate
- Employer contribution rate
- Details of any assumed increases in employer and/or employee contribution rates

Benefits upon Early Retirement

The following information must be provided assuming retirement on the date assumed for early retirement in the Benefits Statement:

Age at early retirement

The value of the member's retirement account

Maximum amount available as a tax-free lump sum.



Member's pension

Spouse's/dependants' pension

Lump sum option and reduced member's pension

The provider must also provide this information assuming the member left service due to permanent ill-health the day after the date of calculation.

Benefits on death

The provider must provide information on the benefits available were the member to die on the day after the date of calculation, and in particular the following:

Lump sum benefit payable

Spouse's and/or dependants' pensions payable

Benefits on leaving service

The provider must provide the following information assuming the Member transferred the PRSA on the day after the date of calculation:

Transfer value payable

General information

Any investment choices available to the member

Any guarantees or bonuses attaching to investment choices



EXPLANATORY NOTE

ACTUARIAL STANDARD OF PRACTICE PRSA-5, VERSION 1.4

This Explanatory Note does not form part of the ASP.

Revisions and updates to Version 1.4 reflect

- Changes to make ASP PRSA-5 consistent with ASP PRSA-2 Personal Retirement Savings Account Product Information v 1.10 where a market annuity rate is used in the illustration of projected benefits when the member is within 5 years of retirement;
- Changes to remove duplicated text repeated from ASP PRSA-2 that describes the methodology and assumptions for determining growth rates and charges used in the projection of benefits. ASP PRSA-5 now refers to using the same methodology as in ASP PRSA 2; and
- Add clarification that ASP PRSA-2 does not require the actuary when preparing the Certificate of Comparison and Written Statement to provide financial advice to the member.