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The following response to the questions about possible revisions to the Academy's Qualification Standards represents my opinion along, and may not be shared by my employer.

Questions 1 and 2. The QS are mute on the subject of whether a society's expansion into an additional specialty track or practice area automatically enables individuals seeking credentials under those expansions to satisfy the first option of the experience requirement under section 2.1. Should this be revisited in light of recent developments in our profession? Should there be a prescribed means by which a current or future society can become qualified to have such credentialing recognized?

Phrased bluntly: it seems inappropriate for the SOA to be able to introduce a new education track in an established practice area and expect that the track will satisfy QS "just because". An appropriate quorum of already-qualified actuaries in that established practice area ought to concur on the appropriateness, completeness and rigor of the track before it can be deemed to be sufficient to meet QS. It also seems like a violation of the spirit of antitrust for QS or any committee of the Academy to be used to give any one society a monopoly on the recognition of having met the education requirements for QS in any particular practice area. There's a middle/neutral ground which ought to be struck if societies choose to compete rather than collaborate.

I have extremely strong reservations regarding one commenter's opinion that specific qualification standards should apply for those who prepare rate filings. At many property & casualty carriers, students serving rotations in pricing are tasked with the routine work associated with preparing normal rate filings, with credentialed actuaries being reserved to supervisory roles, more difficult filings, specific responses requiring specialized analysis, and multistate product development and maintenance.

I would be concerned that the imposition of specific standards on the preparation of routine filings could, depending on the particulars, create resource issues at many carriers and perhaps create longer term issues for the profession by constricting the supply of lower-level positions and distracting credentialed actuaries away from the work for which we are uniquely qualified.

Certain states already impose qualification criteria on actuaries who provide certain information in conjunction with filings. Other states could impose qualification requirements through regulation or legislation if they perceive a need. I see no need for additional constraint to arise from QS.

Several commenters have noted, and I am sure the Academy is aware of, the activities by other organizations in reviewing qualification guidelines for actuarial work. I share their wishes that any revisions to the AAA QS be made with awareness of the direction being taken by those activities...but I also hope the Academy won't feel inhibited from making any specific, needed changes should those other activities be bogged down. Perhaps it would be appropriate to consider a provision analogous to a common provision of our standards of practice, which

generally say “do this, unless the law says otherwise”? Should there be language saying, in effect, in case of overlapping qualification standards, the most stringent combination apply (assuming no conflicts)?

Finally, I note that both the CAS and SOA offer the CERA credential. Under the QS, a CERA designation is not sufficient to convey qualification. However, someone who obtains an FSA through the Enterprise Risk track (becoming eligible for CERA along the way) is, by definition, considered qualified to issue SAO’s in ERM; but an individual who earns CERA while completing FCAS is not. Perhaps there should be a revision to permit FCAS+CERA to convey the equivalent qualification as for an FSA completing the Enterprise Risk track?

Question 3. I think the standard is sufficiently clear, with one minor exception: the division between “organized” and “other” activities is ambiguous as regards self-study actuarial exams. As the standard is currently written, an individual who makes a good-faith effort at an actuarial exam without enrolling in a seminar or an online class might not have satisfied the requirement for organized CE, and that doesn’t seem right.

The CAS alternative CE requirements explicitly acknowledge that Associates who obtain a nonzero score on an exam have satisfied the requirement for structured education. Perhaps the AAA QS should be similarly tweaked, or at least guidance provided in the accompanying commentary?

Question 4. I think it would be reasonable to cap professionalism CE’s to the greater of 3 hours or 20% of total CE’s earned in a year (if carryover capped per question 7) or 6 hours (if carryover not capped), provided that the cap does not preclude CE that may be considered both “professionalism” and “supportive of technical skills maintenance and development” from still counting towards the general CE total.

Question 5. I believe that “Statements of Actuarial Opinion” have been so broadly defined that most who render Actuarial Services will be hard-pressed to not issue an SAO at some point during any given year. I see little harm in extending the QS to extend to all Actuarial Services, provided that the QS are interpreted as to provide sufficient flexibility for actuaries to explore new, emergent, or nontraditional areas of practice, and provided that the QS are not enforced in such a way as to preclude actuarial staff who have not yet met the QS from doing good work.

I would comment that implementing such a change could be used to simplify the QS to only needing a distinction between Actuarial Services and Prescribed Statements of Actuarial Opinion, but the time spent in seminar sessions looking at what is or isn’t an SAO can go a long way towards satisfying that element of the CE requirements.

Question 6. I see no significant need for change for the P&C component.

Question 7. Although I see no particular need to change, I would not object to capping the carryover to 20 hours. If such a change were made, I would like to see the general business education cap revised to “20% of total CE earned in a year” from the current 6 hours per qualification year. If the change was being made because we believe that some CE ought to be

required each year, I'd prefer to not see the "some" being satisfied primarily with general business or non-technical professionalism credit.

I am concerned with one commenter's call for a minimum requirement for business skills development CE. While I think it is valuable to stay sharp on presenting a work product and communicating with customers who many not be fluent in "actuarialese", the concept of "business skills development" CE is rather broad. If we must have a minimum requirement in this regard, I would prefer to see more specific guidance pointing us towards the ventilation of our ivory tower, rather than having an absolute requirement that could be interpreted as being satisfied by spending a few hours each year reading the manuals for our software or taking a refresher course on typing skills.

However, even with that clarification, I would be concerned about CE requirements being rendered too cumbersome due to an additional need to categorize our study time, and/or actuaries being retroactively disqualified because of disagreement about how a particular 50 minutes' of study might be classified.