



AMERICAN ACADEMY *of* ACTUARIES

January 3, 2014

VIA EMAIL – eking@naic.org

Richard Marcks, Chair
NAIC Joint Qualified Actuary (A/B/C) Subgroup (JQA Subgroup)
c/o Eric King
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500
Kansas City, MO 64106-2197

Re: Definition of “qualified actuary”

The American Academy of Actuaries’ Committee on Qualifications (COQ) appreciates the opportunity to provide input in response to the JQA Subgroup’s request to submit comments prior to its next open conference call scheduled for January 8, 2014, regarding the definition of a “qualified actuary.” We understand that the three NAIC Actuarial Task Forces have given the JQA Subgroup the following charge:

“Recommend a uniform definition of ‘qualified actuary’ for life, health and property/casualty appointed actuaries signing prescribed NAIC Statements of Actuarial Opinion, identifying any differences that should remain between lines of business.”

The COQ’s charge is to investigate issues arising with respect to the minimum requirements necessary to qualify actuaries to perform publicly required actuarial functions. It recommends minimum qualification standards, including continuing education requirements, for credentialed actuaries and counsels such actuaries on questions relating to individual qualifications. These minimum qualifications, approved by the Academy Board, are published in the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States (Including Continuing Education Requirements) and applicable to all credentialed actuaries practicing in the United States through Precept 2 of the Code of Professional Conduct. The COQ is comprised of credentialed actuaries practicing in life, property and casualty, health, pension and regulatory areas, and includes members from all five U.S.-based actuarial organizations.

The COQ recommends that any definition of a “qualified actuary” for signing NAIC Statements of Actuarial Opinion should include a reference to qualifications under the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States, and more specifically in connection with the life, health, and property and casualty NAIC annual statement actuarial opinions, include, but not be limited to, the following:

A “qualified actuary” is a person who meets the basic education, experience and continuing education requirements of the Specific Qualification Standards for actuaries signing Statements of Actuarial Opinion related to the NAIC Life and A&H, the NAIC Property and Casualty, and the NAIC Health Annual Statements, as set forth in Section 3 of the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States, promulgated by the American Academy of Actuaries (as the same may be amended from time to time).

The COQ would be happy to discuss this recommendation or any other questions or concerns the JQA Subgroup may have regarding the qualifications of credentialed actuaries. Please do not hesitate to contact Sheila J. Kalkunte, Esq., Academy assistant general counsel (kalkunte@actuary.org) if you have any questions.

Sincerely,

John W. Morris, MAAA, FSA
Chairperson
Committee on Qualifications
American Academy of Actuaries

cc: Thomas Terry, MAAA, FSA, FCA, EA, President, American Academy of Actuaries
Mary Downs, Esq., Executive Director, American Academy of Actuaries