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We (Karen Terry, Nadine Orloff, Tom Finnegan and I) are a small group of actuaries who collectively are members of all 5 US based Actuarial Organizations. We came together to examine ways in which the continuing education/continuing professional development requirements applicable to US actuaries might be better aligned.

We believe there are two significant problems that need to be addressed:

1. The CAS and SOA should make it much clearer that the QS apply to their US based members issuing SAOs.
2. The QS should apply to all actuarial work (not just SAOs) and the sanctions for non compliance should be similar (if not identical) among the five organizations.

I have attached our answers to your questions. If the CoQ decides to open up the QS for revision we have further comments we would like to submit.

Thanks for your consideration.

This represents the personal opinions of a small group of actuaries who collectively are members of all 5 US based Actuarial Organizations. We came together to examine ways in which the continuing education/continuing professional development requirements applicable to US actuaries might be better aligned.

CoQ Questions	Finnegan, Orloff, Perrott and Terry Responses
1. Are there portions of the QS that have prevented otherwise qualified actuaries from practicing in certain areas? If so, how can the QS be modified to allow those actuaries to practice in certain areas while maintaining proper qualification standards?	No

CoQ Questions	Finnegan, Orloff, Perrott and Terry Responses
<p>2. Are there existing, new, or emerging practice areas that require new specific qualification standards to ensure that actuaries practicing in those areas are qualified to do so? If so, what are these areas and what particular standards should be added to any contemplated specific qualifications?</p>	<p>Ethics (the discussion of ethical behavior, not the review of specific provisions of the code of conduct) should be covered separate from, and in addition to, professionalism. The requirement should be 4 hours of ethics and professionalism combined including at least 1 hour each of ethics and professionalism.</p> <p>Ethics is an important part of basic education and something the government recently added to the EA requirement as an important topic to constantly revisit. We feel it is important to have ethics topics in addition to the current professionalism topics</p>
<p>3. In the current QS, is it clear as to what qualifies as organized, other, professionalism and business activities? If not, what changes do you suggest that would clarify these categories of the QS?</p>	<p>Yes</p>
<p>4. Should there be a yearly cap on professionalism CEs? Currently there is a minimum number of professionalism CEs but no maximum. If capped, what maximum amount do you recommend?</p>	<p>No</p>
<p>5. Currently, the QS only apply to actuaries issuing Statements of Actuarial Opinion in the United States, so actuaries providing Actuarial Services without a Statement of Actuarial Opinion are not required to comply with the QS. Should the QS be expanded to include all Actuarial Services as defined in the Code of Professional Conduct?</p>	<p>Yes. We recommend compliance with the QS be a requirement of using professional designations.</p>
<p>6. Section 3.1.1 addresses additional basic and continuing educations requirements for actuaries providing NAIC statements of actuarial opinion. Sections 3.1.1.1 (Life), 3.1.1.2 (Property Casualty) and 3.1.1.3 (Health) each list specific topics for actuaries who issue NAIC opinions as shown in the table below. With regard to these specific qualification standards, should the topics be updated? If so, what topics do you recommend adding, deleting or changing?</p>	<p>We did not address these.</p>

CoQ Questions	Finnegan, Orloff, Perrott and Terry Responses
<p>7. Are the carryover provisions of the QS understandable or do they need to be clarified? If so, what is confusing to you and what suggestions do you have in clarifying the requirements? In addition, should the maximum carryover be reduced so that an actuary will always need to earn some CEs in a given calendar year? Currently an actuary could carry over a full year's CE from the prior year resulting in no additional CEs for the current calendar year. For both of these questions, please address whether your comments apply to general carryover requirements or to specific, organized, professionalism or business requirements.</p>	<p>They are understandable, but need to be displayed more prominently. At least one of us had not noticed them until we read the Qualification Standards carefully to be able to answer this question. As a general matter we think the CPD portion of the Qualification Standards could be simplified and shortened, which would make them more comprehensible.</p>