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General Comments: I think the Qualification Standards are an excellent process to encourage continuing education with a reasonable level of requirements. The biggest issue I've found is that many actuaries don't seem to understand that they are bound by these standards regardless of whether or not they are Academy members and that due to their structure, if they follow the standards of one of the other professional organizations they could be at least temporarily unqualified to issue statements of actuarial opinion. I think a coordinated effort by all of the US organizations to stress to their membership the importance of the national standards would be of great benefit.

Question 1: I am unaware of any such example.

Question 2: I am unaware of any such areas.

Question 3: I think organized, other, and business activities are well defined. I think professionalism is more nebulous, such that most actuaries feel that only activities around the Code of Professional Conduct and the ASOPs qualify. Perhaps an extended list of examples would be helpful.

Question 4: I don't think so. I could see a particular role in which a focus on professionalism would make sense for an actuary - such as a director of professionalism for a firm or company.

Question 5: I do believe the standards should be expanded to include all Actuarial Services. If a professional is practicing as an actuary he or she should be bound by the same requirements of professionalism as someone issuing SAOs. I think most actuaries consider any oral or written communication to employers, clients, or colleagues which are based upon actuarial concepts to be SAOs, but others define them more narrowly. Expanding the requirement to make it clear that anyone practicing as an actuary in the US is bound by the standards would eliminate any issues.

Question 6: I have no recommendations on this topic.

Question 7: I think some carryover makes sense, since one may have the opportunity to do far more than 30 hours of CE in a particular year and that shouldn't be lost. However, I do think it makes sense to require a certain amount of CE in each calendar year, since information does become stale and I would hope most actuaries would consider it to be unprofessional not to make some effort to keep up on the latest developments. Codifying this by limiting carryovers makes a lot of sense to me.