



August 8, 2008

Larry Burning, Chair, Life and Health Actuarial Task Force  
National Association of Insurance Commissioners  
c/o John Engelhardt

Re: Qualifications of Appointed Actuary for Life and Health Companies

Dear Mr. Bruning:

We would like to offer our comments on a proposal discussed on a July 16, 2008 conference call by the PBR Reporting and Review Subgroup of the NAIC Life and Health Actuarial Task Force that would change the required credentials for actuaries who will be certifying the life and health reserves and capital under Principle-Based Approaches.

Both the Society of Actuaries and the American Academy of Actuaries have an important role in the ultimate qualification of actuaries.

The Society of Actuaries (SOA) is an international educational, research, and professional organization dedicated to serving the public and its members. Its mission is to advance actuarial knowledge and to enhance the ability of actuaries to provide expert advice and relevant solutions for financial, business, and societal problems involving uncertain future events.

The role of the American Academy of Actuaries (the Academy) is to represent the entire United States actuarial profession in the formulation of public policy, to support U.S. actuaries in fulfilling their professional responsibilities and to encourage the professionalism of U.S. actuaries by fostering the establishment, communication, maintenance and enforcement of high professional standards.

It is part of the Academy's strategic plan to "[p]ursue laws and regulations that recognize the MAAA credential as the sole credential, in both state and federal laws and regulations, needed to practice in our areas of expertise". In determining the appropriate credentials for actuaries who would sign regulatory statements for life and health reserves and capital under Principle-Based Approaches, both the SOA and the Academy agree that the currently required credential, membership in the Academy (i.e., the MAAA), is the correct credential. It is the American Academy of Actuaries that is the appropriate credentialing organization. While the Society of Actuaries provides the basic and much of the continuing education for most life and health actuaries, it is the American Academy of Actuaries that supports U.S. actuaries in fulfilling their obligations and setting professional expectations with regard to U.S. regulatory requirements.

We therefore urge LHATF to reject the proposal to change the required credential and to continue to support model laws and regulations that require the actuary certifying U.S. regulatory requirements to be a Member of the American Academy of Actuaries.

Bruce Schobel, FSA, M.A.A.A.  
President  
Society of Actuaries

William Bluhm, FSA, M.A.A.A.  
President  
American Academy of Actuaries

Cc: Ms. Leslie Jones, Vice Chair, Life and Health Actuarial Task Force  
Ms. Katie Campbell, Chair, LHATF PBR Reporting & Review Subgroup