Comment 7—8/10/2021—9:42 a.m.

I recommend defining an hour of continuing education as 60 minutes in section 2.2.8. I think that using the common definition of an hour will be easier to understand and apply. The total hours that are required can be adjusted accordingly. For example, adjust the 30-hour requirement to be a 25-hour requirement; 3-hour requirements could remain at 3 hours or become 2.5 hours; the 15-hour requirement could become 13 hours or 12.5 hours; and the 6-hour requirement could change to 5 hours.

I oppose adding a new requirement specific to bias topics. My reasons are similar to the reasons provided in comments 2 through 5 for the Second Exposure Draft.

Sincerely,

Kirk Limmer, FSA, MAAA