

Comment 1—9/2/2020—8:42 pm

Received the following and forwarding comments. Very concerned about the first comment.

1.) Concern on the Message Being Sent to Associates: For page 4, item d, item 2.1(d)(1) & (2), this should also include career Associates in addition to Fellows. 2.1(d)(3) does not cover this. In my case as an example, I have worked 30 years as a credentialed actuary and there are many associates like myself that should not be restricted. The only alternative to this is that the organizations will have to grandfather all existing Associates, or make everyone a Fellow and apply this to new actuaries entering the field. It would be nice to see this item get clarified as soon as possible, since could see a lot of actuaries (associates) be offended by this or definitely have questions.

2.) Actuaries Going into Emerging Fields (Item 3.2): For new product lines (e.g., Pet Insurance), where there are not many actuaries in the space so actuaries will be gravitating into new areas, then who is to say whether an actuary is qualified or not. Should be based on judgement and not a three year rule otherwise how do actuaries ever go into new lines or emerging lines of business.

Hope that this is beneficial. Strongly recommend AAA addressing a follow up email so career Associates do not take this in a very negative way. In my first couple of reads, I definitely did for item #1, so I am sure others will as well. Thank you in advance for your time.

Best wishes.

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