

**Comment 13—9/8/2020—11:23 a.m.**

Good morning,

I have reviewed the latest exposure draft on the U.S.Q.S and have a few comments / questions:

1. Section 1 and Section 2.1.a – references to the CCA and ASPPA have been removed. Why is this the case? Some actuaries only pay dues to the CCA, and are no longer dues-paying members of the SOA, AAA or CAS. In this case, would they be subject to the USQS?
2. Section 2.2.2 – Example – The ending date in the example should state that “The actuary must then earn an additional 30 hours of continuing education in 2022 to issue SAOs in **2023**” (not 2033)
3. This is a more general question on whether or not a self-published article constitutes a Statement of Actuarial Opinion. There is more self-publishing, especially on LinkedIn. Paragraph three of Section 1: Introduction spells out what constitutes an SAO as well as Actuarial Services, but I’m still unclear as to if such articles are subject to USQS. For example, is this a “professional service” as defined by Actuarial Services? The person is not getting paid, so perhaps it’s not a professional service. However, actuaries write several articles for various journals for which they do not get paid. This could make for a good example in an upcoming webcast or FAQ.

Thanks to the committee for giving their time and talent to reviewing the USQS.

Best regards,

Karen

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