



Comment 15--9/8/2020--6:44 p.m.

www.teushealth.com

September 8, 2020

American Academy of Actuaries' Board of Directors
Via 2020USQSComments@actuary.org

Re: U.S. Qualification Standards Request for Comments

Dear Board,

I submit the following comments in response to the draft U.S. Qualification Standards.

- **“Actuaries issuing SAOs in the US”, “actuaries practicing in the US”, and similar phrases.** These phrases suggest that the actuary’s physical geography determines the applicability of the standard, a standard that requires US education and knowledge of US law. This does not seem correct for an era where work often crosses national borders. I believe that the standard applies to any SAO for which US law has jurisdiction, regardless of the geographical location of the actuary or even the principal, and suggest that the language should be modified accordingly.
- **Section 2.2.8 “general business courses and educational materials”.** Section 2.2.8 caps the time for “general business courses and educational materials”. Is “general business” the descriptor for just “courses” or for “courses and educational materials”? Section 2.2.6 describes “business and consulting skill topics”. Is this the same? If so, I suggest the use of consistent terminology.

Sincerely,

Tia Goss Sawhney, DrPH, FSA, MAAA
Owner and Managing Director
tgsawhney@teushealth.com
Mobile: 201-564-8280