

**Comment 21—10/1/20—11:28 AM**

Section 2.1.d under the Basic Education and Experience Requirement is confusing. In Section 2.1.a, an actuary must meet certain criteria, including being a Fellow or Associate of the SOA or CAS. In Section 2.1.d, it states that in addition to (a), (b), and (c) above, certain other criteria must be met with respect to the particular subject of the SAO. These criteria include attaining fellowship in the CAS or SOA, which is redundant to the criteria in Section 2.1.a., but it would appear that the emphasis in subsections (1) and (2) are the “specialized course of examination” and “minimum of one year of responsible actuarial practice” relevant to the subject of the SAO. Since Section 2.1.a. allows Associates of the SOA and CAS to issue SAOs, shouldn’t they also be subject to the “specialized course of examination” and “minimum of one year of responsible actuarial practice” relevant to the subject of the SAO. It appears Associates are subject to subsection (3) and must have a “minimum of three years of responsible actuarial practice”. Thus, Associates have a longer minimum responsible actuarial practice, but aren’t required to have the “specialized course of examination”. This doesn’t make sense to me. I suggest the same criteria should be applied to Fellows and Associates.

I also believe that, for continuing education, sessions on diversity, equity, and inclusion (DE&I) topics should be considered as professionalism or should be required as a separate category. I echo CAS President Steve Armstrong’s opinion that DE&I is relevant to upholding the integrity and reputation of actuaries. The unfortunate Central Park incident might have been avoided if all actuaries were required to be educated about these issues. Aside from making good business sense, DE&I knowledge is crucial in a world where actuaries interact with people of all perspectives, experiences, and backgrounds. Absence of this knowledge is akin to wandering around a foreign country not knowing how to speak the language.

Thank you for your consideration,

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