

Comment #23—10/1/4:25 p.m.

To Whom It May Concern,

I believe it is important to explicitly include the topic of Diversity, Equity, and Inclusion (DE&I) in Section 2.2.2 of the USQS so that DE&I topics can fulfill the requirement of Professionalism CEs.

As a member of the CAS and the AAA, I am proud that our organization is viewed as worthy of being self-regulated. Given the importance of social justice and the attention it has received this year, I think it is important for interested parties outside of the actuarial profession to see that we are taking the subject seriously. This can be accomplished by adding it as a specific requirement in our USQS as a Professionalism CE, not just an optional category under the Business Skills CEs.

Why would interested parties care about our stance on DE&I as a Professionalism CE? The NAIC President has created a Special Committee on Race and Insurance this summer and held their first open meeting in September. The purpose is to find areas within insurance that may have racial bias so that a model law can be created and implemented by state regulators. Congress has also put forth several bills related to discrimination in insurance, like the Prohibit Auto Insurance Discrimination (PAID) Act (H.R. 3693) and Preventing Credit Score Discrimination in Auto Insurance Act (H.R. 1756), to name a few.

If our organization can show the NAIC and Congress that we take DE&I seriously by adding it as a specific requirement for Professionalism CE, then it also shows that we are in alignment with the NAIC Regulators by taking a stand against racial bias in insurance. Then we can advocate to Congress that federal laws to regulate racial bias in insurance are not necessary.

I am proud to be part of an organization that is self-regulated, but when Congress feels the need to put forth federal insurance regulation bills, that shows the actuaries who make those pricing decisions are no longer doing what is necessary to ensure that there is no racial bias within the insurance industry. As an organization, we need to change that perception so that the NAIC and Congress will start to trust our organization to weed out any racial bias. That starts with changing our Professionalism requirements to include DE&I.

Thank you for your time.

Kyle Bartee, ACAS

CSAF President