

Comment #57—10/19/2020—10:07 p.m.

I have a few comments.

2.1a requires someone to be an MAAA or an FCAS/ACAS/FSA/ASA through exam. The CAS does provide a path to FCAS through mutual recognition. Would someone taking this path need to join the MAAA?

2.1d1 requires the actuary to complete a specialized track. The CAS does not have a specialized track. Does this mean that an FCAS/ACAS can not use 2.1d1 to be qualified?

2.2.6 defines what is relevant continuing education. This is focused on what enables an actuary to perform accurate actuarial work that our principals can rely on. It is not focused on what will make us a good employee, team member, or manager - something that our companies can and do address. I think that any D&I requirement will move us away from the current goal of ensuring actuaries are capable and perform quality work - so that we can remain self-regulated.

At least two comments refer to the "Central Park Incident". I don't think that we should be making changes based on one incident that didn't happen within someone's role as an actuary.

Another comment mentions NAIC work on insurance and race. I have attended a number of D&I training courses provided by my employer. I think that they provide little if any content that would help us think about discrimination in insurance and would not help us meet this goal.

Requiring our colleagues to learn about D&I may make them better people and better colleagues, but that is not the role of the AAA.

3.1.2 seems permissive. Getting one other actuary to attest to this person's knowledge doesn't seem like a high enough standard.

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