



AMERICAN ACADEMY *of* ACTUARIES

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September 21, 2001

By Telecopier and First Class Mail

Michael Roach, Esq.  
Chair, Joint Board for the Enrollment of Actuaries  
c/o: Office of Chief Counsel  
Associate Chief Counsel for Tax-Exempt  
and Government Entities  
1111 Constitution Avenue, N.W.  
Room 4539  
Washington, D.C. 20224

Dear Mike:

Over the past week, the Internal Revenue Service and the Department of Labor have granted relief from certain income tax and filing deadlines as a result of the terrorist attacks on September 11, 2001. In the same spirit, we request the Joint Board to provide relief to enrolled actuaries for the continuing education requirements for the enrollment cycle ending December 31, 2001.

Actuaries who lost their offices, and those working with them to help put their lives and their offices back together, may not be able to focus their time on fulfilling the continuing education requirements by the end of this year. Furthermore, their records of continuing education credits earned in the period before September 11, 2001 may have been destroyed. Even those actuaries not directly impacted by the attacks may have a more difficult time earning sufficient credits by year-end. For example, the Los Angeles Benefits Conference of the American Society of Pension Actuaries has already been canceled. While other upcoming meetings of the major actuarial organizations may still be held, attendance may be down due to travel problems and other legitimate business or personal reasons.

The Academy, therefore, respectfully requests the Joint Board allow all enrolled actuaries the *option* to apply credits earned through March 31, 2002, toward the continuing education requirements for the enrollment cycle ending December 31, 2001. Those not electing to use some or all of their credits earned in the first three months of 2002 for the cycle ending in 2001 would be able to apply those credits to the cycle ending December 31, 2004, as would normally be the case. For example, this extension would allow attendees of the 2002 Enrolled Actuaries Meeting to choose to claim credits earned at that meeting for the cycle ending in 2001 or for the cycle beginning in 2002, but not both.

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We request that this optional extension apply to *all* enrolled actuaries, not just those directly affected by the tragedy, for the following reasons: (1) some actuaries may be unable to travel to one of the CCA, ASPA, SOA, etc. meetings scheduled in the near future, either for business, financial, or personal reasons; (2) at least one meeting that provided opportunity for credits has already been canceled and others may be canceled or postponed; (3) the Joint Board will not have to make a determination of who is *directly affected*; and (4) this optional extension will not cause any harm to pension plans or plan participants.

We also request that the Joint Board ease the documentation requirements for continuing education credits for those whose offices were damaged in a federally declared disaster area. These include both the documentation requirements applicable to qualifying sponsors of programs eligible for continuing education credits [Joint Board Reg. ' 901.11(g)(4)(vi)] and the documentation requirements applicable to individual enrolled actuaries [Joint Board Reg. ' 901.11(h)(2)(i)].

While we expect that an individual enrolled actuary will be able to request duplicate documentation of their attendance at programs sponsored by the various actuarial organizations, the documentation for in-house programs of an actuarial firm may have been destroyed. This may be the case for both the individual actuary's records and his or her actuarial firm's records. Documentation for individual study programs, published articles, and other sources of continuing education credit may also be lost. Therefore, under these circumstances, we request that the Joint Board accept the statement of the actuary and his or her organization regarding the number of continuing education credits earned in such programs before September 11, 2001.

Finally, we request an extension to April 30, 2002, for all enrolled actuaries to submit their re-enrollment applications. This will allow an actuary sufficient time to reflect additional credits earned during the first three months of 2002 and to request duplicate documentation to replace records lost during the tragedy. Of course, this will also necessitate an extension of the time that enrolled actuaries may use the A99 prefix with their enrollment numbers to allow the Joint Board to collect and review the re-enrollment applications.

Thank you for your consideration of our request. Please call me at 518-447-2611, if you would like to discuss this request further.

Sincerely,

Lawrence A. Johansen  
President

cc: Joint Board for the Enrollment of Actuaries  
Patrick McDonough  
James Turpin