Comment 11—8/13/2021—12:52 p.m.

The US Qualification Standards correctly address the proper relationships and requirements between an actuary, the client and the actuarial work-product. Diversity and Inclusion Dogma makes certain truth-claims about society that don't have any connection to the professionalism required of an actuary. Therefore, it is very logical for the Committee on Qualifications to avoid *explicitly* addressing Diversity and Inclusion Dogma in its proposed standards, and the committee has made the right decision in this regard.

As regards to the new bias requirement (2.2.6.b), I believe the wording is acceptable and it is within the authority of the AAA to include this. As it is worded, it is simply a *technical* requirement that actuaries spend an hour of learning regarding the broad term of "bias" in technical analysis. As a technical requirement that impacts work product, I believe this is within the purview of the US Qualification Standards.

Section 2.2.6.b may seem like a compromise of sorts, but I am afraid it doesn't address the issue at hand. Proponents of Diversity and Inclusion Dogma are not interested in the technical issues surrounding bias in actuarial analysis; they want to compel everyone to submit to Diversity and Inclusion Indoctrination (as is openly stated in many of the comment letters), and they won't be satisfied with section 2.2.6.b as it is currently written. On the other hand, bias in technical actuarial work is not a prevalent actuarial problem that needs to be specifically addressed in the US Qualification Standards. (Technical bias is less of a current issue than Artificial Intelligence or Predictive Analytics and there is no requirement for those aspects of actuarial work.) From a technical standpoint, section 2.2.6.b provides a solution to a problem that doesn't exist.

There is no need for the AAA, the COQ or the US Qualification Standards to make *any* statements or requirements regarding Diversity and Inclusion. Any side-taking in regards to Diversity and Inclusion Dogma will cause controversy and division within the actuarial community. The actuarial profession will be at its best when it focuses on the topics and issues that unite us, rather than divide us. In this case, actuarial professionalism is the common thread that unites all interested actuaries. Focusing on this topic will best advance our *common* interests and (of course) we are free to pursue our own personal initiatives in separate and appropriate channels.

In regards to Diversity and Inclusion, the US Qualification Standards should simply say "No Comment" and remove section 2.2.6.b from the US Qualification Standards.

Thank you for your hard work and thoughtful consideration of my comments. I sincerely hope we can allow logic and fairness to prevail over partisanship.

These comments are my own and do not represent any other company or organization

Theodore C P Leonard, FSA, MAAA