

Comment 12—8/14/2021—5:56 p.m.

Dear American Academy of Actuaries' Committee on Qualifications:

I am writing with respect to Section 2.2.2 Continuing Education Requirement in General. My specific comment relates to the new requirement that "at least one (1) hour must be on bias topics".

Although I agree with and endorse the concept that "bias topics" as defined in Section 2.2.6(b) may be "Relevant Continuing Education", it nevertheless seems inappropriate and inconsistent to place no limit on "bias topics" hours, given the long standing three hour per year limit on relevant continuing education with respect to "general business skill topics". The specific text I am referring to in section 2.2.2 in this regard reads "least one (1) hour must be on bias topics". The three hour limit on "general business skill topics" has been in place for some time and is appropriate, However I question no limit being placed on "bias topics" hours, especially given that bias topics as defined in Section 2.2.6(b) "may include *but are not limited to* statistical, cognitive, and social biases" (emphasis added) as opposed to being limited to more traditional actuarial topics that are also enumerated in Section 2.2.6(b) (i.e., "addressing biases that may exist in data, assumptions, algorithms, and models that impact Actuarial Services"). Therefore I suggest that the requirement be altered to indicate that "at least one (1) hour is required, but no more than three (3) hours may be spent on bias topics".

Respectfully Submitted,

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