

**Comment 26—8/20/2021—10:52 a.m.**

To the Committee on Qualification:

Thank you for the opportunity to provide comments on the proposed US Qualification Standards.

Page 4, Paragraphs regarding DE&I: I commend the committee for its recognition that the qualification standards in and of themselves cannot address barriers to entry into the profession and that other entities within the actuarial profession in the US, such as The Actuarial Foundation, are better served to address these important issues.

Page 12, Section 1, Paragraph 4 - I suggest expanding this paragraph to include volunteer work performed by actuaries that is not actuarial in nature. For example, an actuary may choose to volunteer by helping others with general financial questions or taxes. Because neither of these topics is actuarial in nature, the volunteer should not be concerned with violating the Code of Conduct or Qualification Standards by providing this valuable community service even if the actuary has not met any basic or continuing education requirements on these topics.

Along the same lines, I would like to see the Qualification Standards address volunteering even more broadly. For example, casualty actuaries can add a lot of value to a group comparing defined benefit with defined contribution plans because of their understanding of risk and time value of money. However, most casualty actuaries do not meet the requirements for providing actuarial services related to retirement plans. I would like to see the Qualification Standards address the extent to which volunteer casualty actuaries can comment on these issues, if at all, and, if so, what disclosures are necessary to avoid violating the Code of Conduct or Qualification Standards. Obviously, the discussion in the Standard would be much broader addressing all actuaries and all areas of practice.

Page 18, Section 2, Paragraph 2.8 - It has never been clear to me whether the carry forward provision applies just to total hours of continuing education or can also be applied to each of the other requirements, such as professionalism. For example, if I have 31 hours of total continuing ed in 2021 of which 4 hours is related to professionalism, can I reduce my 2022 requirements to 29 hours of total continuing ed and 2 hours of professionalism or do I still need 3 hours of professionalism in 2022?

Page 20, Section 3, Paragraph 1 - I suggest broadening the last sentence to include all additional education requirements, not just exams.

Page 20, Section 3, Paragraph 1.1 and subsections - I was unaware that the American Academy of Actuaries offered examinations. If it does not, I think it should be eliminated from these paragraphs. In addition, I suggest replacing "examinations" with "examinations and other education requirements" in each paragraph to ensure that an actuary doesn't miss an important component of the learning process that is delivered through a mechanism other than an exam.

Pages 20 - 21, Section 3, Paragraph 1.1.2 - I suggest that "and volatility surrounding these reserves" be added after "(d) premium, loss, and expense reserves." I also suggest that the topics listed be expanded to include any other assets or liabilities that are contingent on the amount of premium, loss, and expense reserves, such as policyholder dividends and policyholder deposits. These coverage terms are often not considered as part of premium, losses, or expenses.

Page 21, Section 3, Paragraph 2 - The last half of the first sentence is very confusing. I think "under the USQS in effect at that time" is redundant with "qualified to issue the SAO at the time the review took place" and could be deleted.

Page 22, Section 4, Paragraphs 2 and 3 - Might you want to require designations such as CERA and CSPA, where they exist, to show that actuaries have met the education requirements for new applications of actuarial practice or emerging or non-traditional areas of practice?

Page 23, Section 5 - Since the USQS no longer requires that an actuary be a member of an actuarial organization, should the following part of the acknowledgment be placed in brackets:

"I am a member of the American Academy of Actuaries [or other organization] and"

Thank you for your consideration of these comments.

Susan E. Witcraft, FCAS, CERA