

Comment 34—8/20/2021—7:18 p.m.

Greetings,

It seems the bias training requirement has a stated minimum but no maximum (Section 2.2.2).

What would prevent an actuary from wholly satisfying their annual CE requirement from this new and developing subset of CE training, so long as some of it was Professionalism and some Organized? It may sound absurd at face value, but why leave the door open to such an outcome in such a carefully crafted document? If I have missed a material passage to that effect--a limitation on hours from this or other new forms of CE--in another portion of the document, I apologize.

I would propose USQS section 2.2.2 clearly state that the bias requirement is subordinate to the 3-hour "General Business Skills Topics" limitation. In this manner, the industry is better assured of incremental impact as such bias training would be contained to 10% of any given actuary's CE curriculum.

- John Kaspar