

Comment 35—8/20/2021—10:58 p.m.

To the Committee on Qualifications;

I appreciate the time and effort that has been applied to reviewing and updating the standards. This is an important task that rarely gets the recognition that it deserves. I also greatly appreciate the distinction made between what is and is not Academy's role with respect to diversity and inclusion.

However, while reviewing the changes, I found the new continuing education requirement causes me concern and I think it should be removed.

First, I will mention that I think it is important to try to carefully and openly consider points of view that you are unfamiliar with and to continually examine yourself for possible biases in your thinking. I have studied biases extensively in my actuarial training and have attended continuing education sessions on the topic. I certainly found the information helpful and would encourage others to take advantage of webcasts or texts which address the issue. I would also encourage the AAA to offer webinars on this topic given they find it important.

My concern comes in spiking this out as an explicit requirement. Right now, there are essentially two categories. Professionalism and job relevant/business. The rationale given for adding the new bias training is that this is essential knowledge for issuing a statement of actuarial opinion and the fostering of public trust.

If this reasoning holds, then it seems the following examples should also be included as mandatory credits:

- **Communication:** This is essential for actuaries to issue a statement of actuarial opinion and quite frankly is lacking in the actuarial profession. It is well known that actuaries are not considered strong communicators and the reputation with the public would be improved if these skills were honed.
- **Ethical training:** While bias training is important, I think many would argue that part of it would fall under a more general ethical training. Certainly, ethical integrity should be core to any statement of opinion. I think it would be far more beneficial to say that actuaries undergo ethics training than merely bias training from a public relations point of view.
- **Privacy and Security:** As big data continues to grow, it is increasingly important that actuaries become aware of privacy and security concerns. I think with the recent security breaches of K-mart and others, few could argue that this is a topic with which the public is concerned.
- **Logical Fallacies:** While certainly less-top-of-mind than the others, I think that this is absolutely critical and should be included above all else. Certainly, logic is essential for any statement of actuarial opinion. I also believe that this is a neglected topic in the public at large and see it violated on a regular basis: the hasty generalization, the attack on the person, the complex question, the red herring, equivocation, the appeal to inappropriate authority, the argument from ignorance, etc. When dealing with the public,

it is absolutely essential that the actuary be trained in these matters so that they can identify, explain, and correct them.

If the committee has decided to add this one category, then they would need to add other equally important subjects in order to be consistent. If they do not, I believe this will be viewed by both members and the public as having controversial political undertones. I am sure this is not the committee's intention which is why I would encourage them to remove the explicit bias training.

Once again, I appreciate the work and thought put into this effort.

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