

Comment 36—8/20/2021—11:28 p.m.

The bias training is a potentially harmful requirement. Section 2.2.6 b) states:

Bias topics include content that provides knowledge and perspective that assist in identifying and addressing biases that may exist in data, assumptions, algorithms, and models that impact Actuarial Services. Biases may include but are not limited to statistical, cognitive, and social biases.

The stated reason for this change in requirements begins:

Many commentators requested that the USQS clarify that professionalism topics include DE&I, and several of those commentators suggested that DE&I continuing education be required.

I appreciate the effort to keep DE&I mandates out of the Academy's CE requirements. This is good recognition by the committee members to distinguish the role of the Academy from the role of companies and individuals.

None the less, many issues, including bias, remain unsettled both socially and politically. With this in mind, bringing in a requirement specifically geared towards bias gives the appearance that the Academy has a political motivation, whether intentionally or unintentionally. This appearance could result in mistrust of the Academy by member and the public with differing viewpoints. While it is good and proper for individual members to have an informed opinion, it is not the place of the Academy to promote or endorse opinions on these issues.

Thank you,

Daniel Bertsch, ASA, MAAA