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General Comments: It is premature to examine changes to the US Qualifications Standards at this time. Instead, the Academy should work closely with the NAIC and other regulatory bodies to understand their concerns and address them. In no event should the Academy accede to requests for a relaxation of the current Qualification Standards. The Academy may wish to consider whether it needs to be more proactive in ensuring that actuaries providing actuarial services in the US meet the US Qualifications Standards.

Question 1: The Academy has a responsibility to the public in ensuring that actuaries practice only in those areas for which they are qualified. I agree wholeheartedly that qualification is demonstrated both by examination and by experience. I am not aware of any circumstances where the Qualification Standards have prevented otherwise qualified actuaries from practicing in certain areas. I see no need to modify the Qualification Standards at this time. Provision exists for transitioning from one practice area to another.

The NAIC requirements for appointed property/casualty actuaries are more restrictive in defining qualifications, but allow actuaries to demonstrate their qualification and be approved by the Academy's Casualty Practice Council. This process has been effective in allowing actuaries to practice outside their field of education while at the same time ensuring the qualifications of the actuary to perform the specific work. I strongly recommend that the Academy adopt this practice for its other practice areas and advocate that the NAIC recognize it as strengthening their qualification process.

Question 2: With respect to existing practice areas, I strongly advocate that a Fellow rendering an opinion in a practice area new to the individual have a minimum of three years experience under the supervision of an actuarial qualified in that practice area before signing opinions. Consideration could be given to a limited authority for signing but should be subject to review by the appropriate practice council of the Academy. The risk management field, and the CERA designation, is an example of an emerging area of practice for which a new specific qualification might be considered. However, I believe the general qualification standards are sufficient.

Question 3: The definitions are clear. However, if the Qualifications Standards are reopened, I believe it is appropriate to consider relaxing the definition of "organized" somewhat, similar to the "structured" definition adopted by the CAS. Most members attending an in-person event do not contribute to the discussion but benefit from hearing the discussion; a taped event of an in-person meeting or webinar, where the discussion is recorded, accomplishes essentially the same objective. With respect to professionalism, it should be recognized that many professionalism topics also cover relevant areas of practice. There is likely some diversity in the way that actuaries record their training. As an example, the Academy hosts an effective opinion writing seminar each year, where the

actuary's responsibilities are discussed in detail. One could argue that the entire session is professionalism, or organized relevant activity, or some combination thereof. It would be interesting to see how individual actuaries logged that time.

Question 4: As noted in my response to Question 3, I think there is diversity of practice in how professionalism topics are considered. Many professionalism topics, primarily those that cover standards of practice, relate directly to broadening or deepening the actuary's base knowledge with respect to the work that he/she performs. I believe that the current minimum number of professionalism CEs is appropriate. If revised, I would keep the existing proportion of professionalism to total continuing education hours as a basis for setting a cap.

Question 5: Yes. While the current Qualification Standards provide a very broad definition for statements of actuarial opinion, the requirement that the actuary intend that his/her workproduct will be relied upon has led to some abuse of the QS. Changing the Qualification Standards to apply to all Actuarial Services will serve two purposes: it will subject all actuaries practicing in the US to the Qualification Standards and it will eliminate the need to differentiate between the general statements of actuarial opinion and the specific Statements of Actuarial Opinion.

Question 6: These topics are appropriate for Property/Casualty opinions. I am not qualified in the other areas of practice.

Question 7: The carryover provisions are understandable and do not need to be revised.