

Comment #36—10/8/2020—6:01 p.m.

To the American Academy of Actuaries' Qualification Standards Committee,

I'm writing to address the expansion of professionalism continuing education to include Diversity, Equity, and Inclusion (DE&I) topics. First, it should be emphasized that given the historic homogeneity of our profession, both in regards to demographics and educational background, it is imperative that we take active steps to expand outreach to minorities and those with other perspectives, and to ensure that members are equipped with the tools to properly work towards maintaining an inclusive environment. Formally recognizing the value of DE&I education is necessary to both maintain standards of excellence for our profession, as well as to ensure that members are equipped to operate in an increasingly diverse global environment.

Second, the current position of the Qualification Standards FAQ—that DE&I topics typically should be categorized as “business and consulting skills”, while “business ethics courses might count as professionalism”—is out of line with the reality of the situation and the goals of continuing education, and shows a lack of understanding of what formal education in business ethics typically looks like. Topics are generally considered to be relevant if they enhance an actuary's knowledge and ability to carry out the work they do. Education in how to value the contributions of coworkers who are different from ourselves, how to show them courtesy and professional respect, and how to recognize the biases which may inhibit the ability to cooperate and communicate effectively: this unambiguously furthers one's knowledge of one's work environment, and improves one's ability to practice competently and professionally within it.

Education in business ethics, however, typically does not practically improve an actuary's ability to carry out their responsibilities, at least not to the same degree as DE&I education. I say this as someone whose degree is in philosophy, who has spent more time studying the field of ethics than the large majority of my profession, and who can thus speak to its relevance to typical actuarial work. Paging through the texts from my most recent course on business ethics, I struggle to justify how Thomas Aquinas' *Summa Theologiae*, Friedrich Schiller's *On the Aesthetic Education of Man*, or G. W. F. Hegel's *Elements of the Philosophy of Right* are considered to be more likely to materially improve one's ability to practice as an actuary than a seminar on how to use inclusive language. There are many situations where greater respect, understanding, and knowledge of one's own biases has improved relationships with coworkers and the ability to effect actuarial work product. There are few situations where someone has been a better actuary because they knew that Aquinas's sixth objection to the question of “whether simony is an intentional will to buy and sell something spiritual or connected with a spiritual being” pertains to the necessary connections of what are to be considered “spiritual things” (Aquinas, Thomas. “On Simony.” *Summa Theologiae*, translated by Mark D Jordan.)

I say this not to disparage the study of philosophy and ethics by actuaries (something I believe is valuable for the actuarial profession), but to emphasize that the current FAQ doesn't align with the stated goals of continuing education. The field of business ethics is most assuredly not more relevant to professionalism and the actuarial practice than DE&I, and topics which touch upon it

are not more likely to meet the definition of relevant continuing education than those which deal with DE&I. If professionalism's definition is to be narrowly circumscribed, it is illogical to implicitly have specific exceptions to include topics which pertain to the former while doing the opposite for the latter. At the very least, even if DE&I isn't explicitly added to the examples of relevant professionalism topics within the standards themselves, the FAQ point stating that it generally should be counted as "general business" should be removed, and actuaries left to make that determination on their own. As it stands, the current FAQs are arbitrary and counter to the stated goals of continuing education.

Sincerely,

Aaron Halpine, FCAS