**From:** "Lederer, Julie"
**Date:** May 18, 2020 at 6:55:41 PM CDT
**Subject:** **RE: Casualty Actuarial and Statistical (C) Task Force Conference Call - May 19**

Good evening,

I reviewed the revised CE log (attached) in light of my 2-28-20 letter (also attached) on the previous draft. I believe there have been some significant improvement to the log, and I appreciate the effort of those working on this project. Below, I list continuing concerns, improvements from the prior draft, and additional comments.

Continuing concerns, as first noted in my comment letter dated 2-28-20:

1. Though the log has improved from the prior draft, I still believe it would be preferable to ask actuaries to add a column to their existing CE log to indicate the NAIC-sanctioned category, as opposed to promulgating a required log format.
2. The dropdown menus that don’t allow free text make the categorization columns inflexible and reduce the value of aggregated data collected from these logs.
3. I recommend that actuaries not be required to use this spreadsheet to track their CE until 2021 since we are well into 2020. (In contrast, cell C9 of the INSTRUCTIONS tab suggests that this form will be used to log CE performed in 2020.)
4. My comment on general versus specific CE has been partially addressed, since the actuary completing the log can now indicate if the session is used to meet general or specific CE. But it would be helpful if the cells in columns 13-17 were grayed or locked if the actuary selected “no” in column 12.
5. As described in my letter, both the CAS and the SOA’s CE policies recommend a “brief description” of the CE activity. There is still no column for this in the log. The actuary could describe the activity in column 18, “additional notes,” but it would be preferable to add a distinct column.
6. The form sometimes refers to CE (e.g., cell C27 of the INSTRUCTIONS tab) and sometimes CPD (e.g., cell C20 of the INSTRUCTIONS tab). I recommend using CE since that aligns with the Statement of Actuarial Opinion instructions’ reference to continuing education. Regardless, the form creators should choose one acronym and stay consistent.
7. Some minor typos remain (e.g., in cells C9, C27, A36, and A37 of the INSTRUCTIONS tab).

Positive changes from the 9-26-19 to the 5-15-20 log that reflect suggestions I made in my 2-28-20 letter:

1. The categorization of CE in the log has been simplified, with some columns collapsed.
2. The log has more mechanisms in place to reduce category-related input error (specifically, in column 15, which depends on the input in column 14).
3. The distinction between the categories in USQS section 3.1.1.2 and the NAIC categories is now clear.
4. The log now calculates the total CE credits.
	1. One issue: The log should calculate credits by attestation year in column 2, but the formula in cell H88 is just a simple sum.
	2. One suggestion: As I noted in my letter, it would be helpful if the log calculated additional subtotals by attestation year: specific, organized, professionalism, and general business.

Additional comments on 5-15-20 log:

1. Column 2, “attestation year,” is new with the revised log. I recommend clarifying this column, perhaps with more wording and some examples on the INSTRUCTIONS tab. (We in Missouri experienced confusion from an appointed actuary this year in regards to the attestation year. He attested to meeting the requirements for 2019 on the CAS’s website since he did his CE in 2019, whereas he should have attested for 2020.)
2. I recommend changing the wording in the peach shaded cells in row 8 from “Only required for appointed actuaries” to something like “Only required for those certifying compliance with the CE requirements of the NAIC P/C Statement of Actuarial Opinion.” I believe anyone who self-certifies compliance for NAIC SAOs on the CAS or SOA website will be subject to audit, regardless of appointed actuary status.
3. I believe actuaries may be confused about what to put in column 3 (“continuing education description”) and column 6 (“event name”). Based on the column titles, I would put a brief description of the activity in column 3 and the title of the activity in column 6; this is not what the log’s creators intend, per the INSTRUCTIONS tab.
	1. In addition, in contrast to the red shading and the text that says “required,” column 6 is only required in a specific situation per the INSTRUCTIONS tab. So this should probably be shaded peach, with the “required” label removed.
4. Column 4 (“event type”) is a dropdown menu, and the user is not allowed to enter freeform text. But some event types mentioned in the USQS (e.g., committee work and courses) aren’t included in the menu.
5. Columns 9 and 10 need editing.
	1. First, the log is incorrect in assuming that the activity isn’t organized if it’s sponsored by one’s employer. USQS Section 2.2.7 says, “Continuing education can be obtained through either ‘organized activities’ that involve interaction with actuaries or other professionals working for different organizations or ‘other activities.’… In-house meetings can satisfy the requirement of interaction with actuaries or professionals working for different organizations by using outside speakers.”
	2. Second, it’s not correct for column 10 to default to “organized” if one selects “no” for column 9. E.g., if a CE activity is self-study, one would answer “no” to column 9 since this wasn’t a presentation by the employer, but it’s not correct for column 10 to then default to “organized.”
6. Why is there a column 16 for the “other” subcategory? Could these subcategories be added to the dependent dropdown list in column 15?

Thank you for considering these comments.

Best regards,

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