Dear Kris,

Thank you for the opportunity to provide a comment. I appreciate the work of the CAS/SOA task force.

I understand that the CAS and SOA will consider appointed actuaries’ continuing education (CE) in light of certain categories (law/regulation, reinsurance, etc.). Gathering data on the categorization of CE may be useful and could prompt discussion. I might be concerned, however, if the data gathering exercise leads to a recommendation to implement requirements on the number of hours attained in each category (e.g., minimum of 2 credit hours in law/regulation, minimum of 2 credit hours in reinsurance, etc.). It could be problematic to add more specificity to the CE requirements because an appointed actuary should tailor his CE to his particular situation. CE should bridge any gaps between what the actuary needs to know to sign the opinion and what he currently knows via basic education, experience, and past CE. The breakdown of CE by category could look very different for two appointed actuaries who have different backgrounds and work on different types of engagements.

Sincerely,

Julie Lederer

To the Casualty Actuarial and Statistical (C) Task Force Commissioners’ Representatives, Interested Regulators and Interested Parties:

On its call today, the Casualty Actuarial and Statistical (C) Task Force exposed the CAS/SOA Task Force’s Appointed Actuary Continuing Education Verification Process proposal: https://naic.org/documents/cmte_c_catf_190514_review.docx

The proposal is exposed for a 24-day comment period, with comments to be submitted to Kris DeFrain (NAIC) by Friday, June 7. The Task Force specifically requested attention to the categorization of continuing education included in the proposal.

The short comment period was established so the Task Force can discuss comments on its June 11 conference call. For additional information on this project see the following background document: (https://naic.org/documents/cmte_c_catf_190514_review_background.docx)

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