

Revised EA Regs: A Few Suggestions

Editor's Note: The following is the full text of comments the Academy sent to the Joint Board for the Enrollment of Actuaries (JBEA) on potential revisions to regulations governing services provided by enrolled actuaries under ERISA. The comments were prepared by the Pension Practice Council, in coordination with members of the Council on Professionalism.

September 28, 2004

Internal Revenue Service

Attn: SE:OPR [Joint Board regulations]

1111 Constitution Avenue, NW
Washington, DC 20224

Dear Chairman Nuissl:

ON BEHALF OF THE American Academy of Actuaries, we appreciate the opportunity to present comments regarding possible revisions of your regulations pertaining to the services provided as an enrolled actuary under the Employee Retirement Income Security Act of 1974 (ERISA). The comments below are structured to address the areas in which you requested comments.

ENROLLMENT AND RENEWAL OF ENROLLMENT


► In identifying the subjects to be covered by the enrollment exams, the syllabus should be expanded to include the selection of assumptions. This area is one of the major responsibilities of

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The *Enrolled Actuaries Report* is a quarterly publication of the American Academy of Actuaries (www.actuary.org).

Advancing the Principles of Financial Economics

EVEN AS A PENSION PRACTITIONER, you might be hazy about the finer points of financial economics. And if so, you are not alone.

On Nov. 18, the Academy and SOA Joint Task Force on Financial Economics and the Actuarial Model held a roundtable discussion on the topic with the express purpose of educating actuaries, regulators, standard-setters, and policy-makers on the concept and details behind financial economics, as well as its potential impact on traditional actuarial paradigms. The daylong session at New York University's Rosenthal Pavilion attracted more than 60 participants.

"This was an invaluable opportunity for

leaders in the pension community, including those who are not actuaries, to gain information about financial economics," said Ken Kent, the Academy's vice president for pension issues. "The roundtable gave everyone an opportunity to question, clarify, challenge, and consider the principles of financial economics as they apply to pension consulting. We were able to move the discussion along."

The roundtable was broken down into five sessions: a basic introduction to the tenets of financial economics, a discussion of appropriate investment choices, impacts on accounting for pension plans, an examination of issues in funding defined benefit (DB) plans, and alter-

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native plan designs that could fit within the new paradigm.

It is important in financial economics, which is most often characterized by measuring the value of plan liabilities as similar market instruments, that plan sponsors recognize the opportunity to hedge investment risks through moves in pension plans from equities to bonds. It is equally important that policy-makers, shareholders, participants, and employers understand the difference between funding and accounting for pension plans as the concepts of financial economics are applied.

Accounting for pension plans will most likely be the first area to transition to a methodology embraced by financial economists, as indicated by a recent decision of the Financial Accounting Standards Board (FASB) and International Accounting Standards Board to jointly undertake a convergence project aimed at moving Financial Accounting Standard 87 to something that looks more like Financial Reporting Standard 17 (the current standard in Great Britain). During the meeting, FASB's Peter Proestakes indicated that the board is interested in and strongly encouraged the profession to provide input regarding pension and other post-employment benefit accounting.

Task Force member Jeremy Gold, the roundtable's main speaker, said that from a financial economics perspective, accounting for pension plans should be on an accumulated benefit obligation (ABO) rather than on a projected benefit obligation (PBO) basis. Such accounting would represent a snapshot picture of liabilities on a specific day, providing what many financial economists consider better transparency.

It was noted that for funding purposes, financial economics

would support one primary funding rule rather than the myriad current minimum funding rules. Plans would be required to remain fully funded on a current liability basis. While the Academy's Pension Practice Council has established predictability as one of eight principles for funding reform, members of the roundtable discussed the alternative of hedgeability standards, which could allow plan sponsors to accept, dispose of, and manage risk more effectively.

Value destroyers and value creators, those factors that increase and decrease the overall value of DB plans, were identified during the roundtable discussion. Identified value creators included annuities, transparency, use of ABO, new vesting schedules, and a focus on total compensation. Identified value destroyers included items like lump sums, implicit contracts, use of PBO, smoothing, and unhedgeable benefits. In order to promote good public policy, several participants observed that the focus should be on encouraging those features and incentives that are uniquely present in DB plans.

Despite an occasional divergence of opinion on the appropriate paradigm for the management of DB plans, several participants reiterated the importance of promoting the value of DB plans as a necessary component of retirement security. The discussion highlighted how the principles of financial economics could support this vision.

Assisting Gold, who moderated the roundtable discussion, was Mark Ruloff, chairperson of the task force, who provided introductory and concluding remarks.

—Heather Jerbi



VOLUME 29 ■ NUMBER 4 ■ WINTER 2004 ■ PUBLISHED BY THE AMERICAN ACADEMY OF ACTUARIES

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the enrolled actuary, yet the subject has never been examined. We are particularly concerned with selection of assumptions regarding asset rates of return, a key element of a Schedule B filing. We recognize that this subject of selection of assumptions does not readily lend itself to be examined on a multiple-choice examination, and we are available to work with you and the Advisory Committee to develop appropriate exam material.

► Furthermore, the current exams contain questions that often test several concepts in a single question. For example, a candidate could get three of the four concepts right but get no credit for the work. It would be better to break the question down into four questions if the intention is to examine the four concepts. Including additional, shorter questions would yield a better examination process.

► Additionally, members of the Academy believe the definition of core and non-core subject matter for continuing education should be expanded and clarified. Knowledge of ERISA's Titles I and II should have been core from the start, and Internal Revenue Code Sections 419, 419A, and 420 should be added as core subject matter because enrolled actuaries may be authorized to practice before the IRS in these areas. In addition, we suggest that pension plan design, investment, finance, risk theory, and pension solvency issues are valuable enough to be core subject matter because these topics will help enrolled actuaries to better understand solvency issues. Non-core subject matter should be expanded to specifically include (1) work dealing with accounting for retirement benefits other than pensions, and (2) consulting skills.

► We suggest the board consider modifying the regulations to allow for flexibility in the number of exams, and clarify whether there is a time limit for completion of these exams.

► Finally, the regulations that require enrolled actuaries to maintain paper copies of the outlines for the sessions they have attended should be amended to reflect innovations in record storage. The certificate of attendance from the qualifying sponsor should be sufficient.

REGULATIONS ON CONTINUING PROFESSIONAL EDUCATION

► The regulations should be updated to permit using the Web and other delivery methods as alternatives to formal meetings. Many qualifying sponsors are already using these methods. In particular, it would be helpful to clarify ways to substantiate attendance—hopefully with a level of effort comparable to the procedures applying to people attending a session in person. We would also encourage the Joint Board to clarify its requirements for documenting attendance at in-person meetings.

► In our opinion, requiring the current 36 credit hours over a three-year cycle is appropriate. The current regulations give four to one credit for preparation to participate in a program, but limit the credits that can be used to one-half, or 18 credits.

The regulations should separate the credit between attendance and preparation, thus permitting the use of attendance credits beyond the one-half. Another possibility would be to reduce the preparation credit to three to one and permitting up to 24 (or two-thirds) of such credits to be used.

► Qualifying sponsors must renew their approval from the Joint Board every cycle; however, there is no guidance on how this should be done. The regulations should provide guidance on renewal of approval for qualifying sponsors.

► The regulations should state that qualifying sponsors may withhold session credit for inattentive or disruptive conduct.

► We also encourage the board to consider giving credit for substantially contributing to relevant articles, even if the actuary is not the primary author.

► The board's current regulations call for qualifying sponsors to be published periodically. Perhaps the Joint Board could consider publishing such a list on the JBEA website to help actuaries locate programs that might be available in their area, and to verify that the sponsor has been approved by the JBEA.

WAIVERS OF CPE

► We have no changes to suggest regarding this issue.

TYPES OF ENROLLMENT STATUS

► The regulations should be revised to extend inactive status to six years, because we feel that three years is too short. Enrolled actuaries often leave the workforce for child-rearing or other responsibilities, and they should not be discouraged from resuming their careers. Special "catch-up" requirements may be appropriate in these cases.

► The regulations should also permit waiver of some CPE requirements for an enrolled actuary going from inactive to active status (depending upon the circumstances).

STANDARDS OF CONDUCT, PERFORMANCE, AND PRACTICE

► Since its establishment, the JBEA has not been very active in investigating and disciplining enrolled actuaries whose performance does not meet standards. We recognize that it has been a question of adequate resources. Perhaps the regulations, or the JBEA's internal practices, can be changed to permit the JBEA to use the Actuarial Board for Counseling and Discipline ("ABCD") as an independent contractor to investigate complaints against enrolled actuaries. We acknowledge that there are some challenges, such as the need for confidentiality, but we feel that there should be a way to work through these issues in order to take advantage of the experience and availability of the ABCD's resources.

► An alternative would be to require enrolled actuaries to become members of an actuarial organization within one year of

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Updated Social Security and

Covered Compensation, 2005 2005 Wage Base \$90,000

YEAR OF BIRTH	AGE IN 2005	SSRA	YEAR OF SSRA	COVERED COMPENSATION ROUNDED TO:			
				\$1*	\$12	\$600**	\$3,000
1938	67	66	2004	44,003	43,992	43,800	45,000
1939	66	66	2005	46,351	46,344	46,200	45,000
1940	65	66	2006	48,700	48,696	48,600	48,000
1941	64	66	2007	51,014	51,012	51,000	51,000
1942	63	66	2008	53,277	53,268	53,400	54,000
1943	62	66	2009	55,471	55,464	55,200	54,000
1944	61	66	2010	57,640	57,636	57,600	57,000
1945	60	66	2011	59,774	59,772	60,000	60,000
1946	59	66	2012	61,874	61,872	61,800	63,000
1947	58	66	2013	63,940	63,936	64,200	63,000
1948	57	66	2014	65,857	65,856	66,000	66,000
1949	56	66	2015	67,689	67,680	67,800	69,000
1950	55	66	2016	69,411	69,408	69,600	69,000
1951	54	66	2017	71,057	71,052	70,800	72,000
1952	53	66	2018	72,609	72,600	72,600	72,000
1953	52	66	2019	74,100	74,100	74,400	75,000
1954	51	66	2020	75,540	75,540	75,600	75,000
1955	50	67	2022	78,231	78,228	78,000	78,000
1956	49	67	2023	79,517	79,512	79,800	81,000
1957	48	67	2024	80,717	80,712	81,000	81,000
1958	47	67	2025	81,823	81,816	81,600	81,000
1959	46	67	2026	82,869	82,860	82,800	84,000
1960	45	67	2027	83,854	83,844	84,000	84,000
1961	44	67	2028	84,780	84,780	84,600	84,000
1962	43	67	2029	85,620	85,620	85,800	87,000
1963	42	67	2030	86,443	86,436	86,400	87,000
1964	41	67	2031	87,223	87,216	87,000	87,000
1965	40	67	2032	87,926	87,924	88,200	87,000
1966	39	67	2033	88,543	88,536	88,800	90,000
1967	38	67	2034	89,040	89,040	88,800	90,000
1968	37	67	2035	89,434	89,424	89,400	90,000
1969	36	67	2036	89,709	89,700	90,000	90,000
1970	35	67	2037	89,854	89,844	90,000	90,000
1971	34	67	2038	89,940	89,940	90,000	90,000
1972	33	67	2039	90,000	90,000	90,000	90,000

*Represents exact average of wage bases, as permitted by law and regulations.

** After 1993, IRS does not authorize the use of covered compensation tables rounded to \$600 multiples under 401(l). Thus, integrated plans using this table are not safe-harbor plans.

These three tables list updated figures for IRS pension limits, Social Security amounts, and covered compensation for 2005.

The tables were compiled by Andrew Eisner of Mellon's Human Resources & Investor Solutions Research Department

IRS Amounts for 2005

Social Security—2005 Factors

On Oct. 19, the Social Security Administration announced updated factors for 2005.

Wage Base	The maximum amount of earnings taxable in 2005 is \$90,000 for Social Security purposes.
COLA	The cost-of-living increase in benefits is 2.7%, first applicable to December 2004 benefits, payable in January 2005.
Wage Index	The average annual wage figure of \$34,064.95 will be used in computing benefits for workers who become eligible in 2005. This figure is based on data for the last complete year (2003) and was used to determine other wage-indexed numbers given in the table below.

FACTOR	2004	2005
Wage base:		
for Social Security	\$87,900	\$90,000
for Medicare	No Limit	No Limit
old-law wage base, for indexing PBGC maximum, etc.	\$65,100	\$66,900
Cost-of-living increase (applies to December benefits, payable in January)	2.1%	2.7%
Average annual wage (based on data 2 years earlier)	\$33,252.09	\$34,064.95
PIA formula, 1st bend point	\$612	\$627
PIA formula, 2nd bend point	\$3,689	\$3,779
Maximum family benefit, 1st bend point	\$782	\$801
Maximum family benefit, 2nd bend point	\$1,129	\$1,156
Maximum family benefit, 3rd bend point	\$1,472	\$1,508
Retirement test exempt amount (annual):		
below SSNRA	\$11,640	\$12,000
year of SSNRA	\$31,080	\$31,800
Wages needed for one quarter of coverage	\$900	\$920
FICA (employee) tax rate:		
Social Security (OASDI)	6.20%	6.20%
Medicare (HI)	1.45%	1.45%
Total	7.65%	7.65%
SECA (self-employed) tax rate, total	15.30%	15.30%

IRS Pension Limits for 2005

PRINCIPAL LIMITS

IRC §	LIMIT	2004 ROUNDED	2005 ROUNDED	2005 UNROUNDED	NEXT INCREMENT	INCREASE NEEDED
415(b)(1)	Defined benefit plan limit	\$165,000	\$170,000	\$170,656	\$175,000	2.5%
415(c)(1)	Defined contribution plan limit	41,000	42,000	42,664	43,000	0.8%
401(a)(17)	Limit on includible compensation*	205,000	210,000	213,320	215,000	0.8%
402(g)(1)	Limit on 401(k)/403(b) elective deferrals**	13,000	14,000	14,000	15,000	N/A
414(q)(1)	HCE definition	90,000	95,000	96,384	100,000	3.8%
414(v)(2)	401(k)/403(b)/457(b) Catch-up deferral limit**	3,000	4,000	4,000	5,000	N/A

OTHER LIMITS

IRC §	LIMIT	2004 ROUNDED	2005 ROUNDED	2005 UNROUNDED	NEXT INCREMENT	INCREASE NEEDED
457(e)	Limit on nonqualified deferrals**	\$ 13,000	\$ 14,000	\$ 14,000	\$ 15,000	N/A
409(o)(1)(C)	ESOP payouts, 5-year limit	830,000	850,000	853,280	855,000	0.2%
409(o)(1)(C)	ESOP payouts, additional 1-year limit	165,000	170,000	170,656	175,000	2.5%
408(k)(2)(C)	SEP pay threshold	450	450	480	500	4.2%

*Governmental plans have special rules for eligible participants as defined in OBRA '93.

** The Economic Growth and Tax Relief.

catch-up deferral limit through 2006. Thereafter, these limits will be adjusted for inflation.

attaining enrollment and to maintain that membership as a condition of enrollment. This would have the result of making them subject to the Code of Professional Conduct that all the major actuarial organizations in the United States and Canada subscribe to. If the above idea is not feasible, we strongly recommend that the JBEA incorporate the Code of Professional Conduct into its regulations as applying to all enrolled actuaries. If the JBEA is concerned that referring directly to the Code of Professional Conduct in its regulations would delegate too much authority to private entities, we strongly recommend that the JBEA amend its regulations to include as much of the text of the code as the JBEA deems relevant and appropriate. We have developed the enclosed comparison of the Code of Professional Conduct and the JBEA's current regulations to facilitate this process.

► Finally, we recommend that the JBEA's regulations require a minimum number of hours of CPE (e.g., three per re-enrollment cycle) be related to professionalism topics to ensure that all enrolled actuaries are exposed and sensitized to the areas where professionalism issues arise in everyday practice.

We appreciate the opportunity to provide these comments, and we would be delighted to discuss our ideas with you at your convenience. Please contact Heather Jerbi, the Academy's pension policy analyst (202.785.7869; Jerbi@actuary.org) if we can be of assistance.

Sincerely,

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A Comparison of the Regulations of the Joint Board

THE JOINT BOARD FOR THE Enrollment of Actuaries maintains regulations setting forth standards of performance for enrolled actuaries. The American Academy of Actuaries and its sister organizations maintain a Code of Professional Conduct that sets forth standards of conduct for their members. The Joint Board's regulations and the code are compared below.

GENERAL OBSERVATIONS

The Joint Board's regulations apply only to enrolled actuaries in the performance of their work under ERISA; the code is designed for broad application to actuaries practicing in the pension, insurance, and financial services industry not only in the United States but around the world. Consequently, the code is both broader and less specific in its language than the Joint Board's regulations.

The code contains annotations that provide "explanatory, educational, and advisory material on how the Precepts [of the code] are to be interpreted and applied." The Joint Board's regulations contain no such advisory material.

The Academy is a professional organization bound by antitrust law; the Joint Board is a governmental entity that is exempt from antitrust law. The Joint Board, therefore, can absolutely require or prohibit some forms of conduct where the Academy cannot.

Both the Joint Board's regulations and the code apply to performance of "actuarial services." However, the Joint Board's regulations define "actuarial services" as "performance of actuarial valuations and preparation of any actuarial reports" [20 C.F.R. Section 901.1(h)]. The code defines "actuarial services" as "professional services provided to a [p]rincipal [i.e., client or employer] by an individual acting in the capacity of an actuary. Such services include the rendering of advice, recommendations, findings, or opinions based upon actuarial considerations." Arguably, the latter definition is broader than that

of the Joint Board's regulations.

The Joint Board's regulations contain some specific requirements that the Academy's code does not. However, the code requires actuaries to comply with applicable law. Consequently, the Academy's enrolled actuary members must satisfy the requirements of both the Joint Board's regulations and the code.

SPECIFIC PROVISIONS

The Joint Board's regulations permit rejection of candidates for enrollment if they have engaged in "disreputable conduct" [20 C.F.R. Sections 901.12(e) and 901.13(f)]; the regulations also permit the Joint Board to suspend or terminate an actuary's enrollment if that actuary has engaged in "disreputable conduct ... or other conduct evidencing fraud, dishonesty or breach of trust" [20 C.F.R. Section 901.31]. Precept 1 of the code requires Academy members to "act honestly, with integrity and competence, and in a manner to fulfill the profession's responsibility to the public and to uphold the reputation of the actuarial profession." Although these concepts set forth in the Joint Board's regulations and the code are similar, they are not identical.

Section 901.20(a) of the Joint Board's regulations requires an enrolled actuary to "undertake an actuarial assignment only when qualified to do so." Precept 2 of the Code of Professional Conduct requires actuaries to provide actuarial services only when they are "qualified to do so on the basis of basic and continuing education and experience *and* only when the [a]ctuary satisfies applicable qualification standards" (emphasis added). In the United States, the applicable qualification standards are the *Qualification Standards for Prescribed Statements of Actuarial Opinion* promulgated by the Academy.

Section 901.20(b) of the Joint Board's regulations prohibits enrolled actuaries from performing actuarial services "for any person or organization which he/she believes or has reasonable grounds for believing may utilize his/her services in a

for the Enrollment of Actuaries and the Code of Professional Conduct

fraudulent manner or in a manner inconsistent with law.” Precept 8 of the code requires actuaries to “take reasonable steps to ensure that [actuarial] services are not used to mislead other parties.” This obligation is clarified in Annotation 8-1, which calls for actuaries to recognize the risk that actuarial communications may be misunderstood or misused and, therefore, to take reasonable steps to present such communications clearly and fairly and to include appropriate limitations on their distribution and use.

Section 901.20(c) of the Joint Board’s regulations requires the enrolled actuary to provide supplemental advice or explanations about actuarial reports signed or certified by the enrolled actuary in response to a reasonable request from the trustee. Precept 4 of the code, as explained by Annotation 4-2, requires the actuary to indicate in an actuarial communication (a term that is broader than the Joint Board’s term, “actuarial reports”) the extent to which the actuary or other sources are available to provide supplementary information and explanation.

Section 901.20(d) of the Joint Board’s regulations prohibits an enrolled actuary from performing actuarial services in any situation in which the enrolled actuary has a conflict of interest (suggesting that this section applies only to actual conflicts of interest) “except after full disclosure has been made to the plan trustees, any named fiduciary of the plan, the plan administrator and, if the plan is subject to a collective bargaining agreement, the collective bargaining representative.” Precept 7 of the code prohibits the actuary from knowingly performing actuarial services involving an *actual or potential* conflict of interest unless:

- ➡ a) the actuary’s ability to act fairly is unimpaired;
- ➡ b) there has been disclosure of the conflict to apply present and known prospective principals; and
- ➡ c) all such principals have expressly agreed to the actuary’s performing the actuarial services.

Section 901.20(e) of the Joint Board’s

regulations requires the enrolled actuary to “exercise due care, skill, prudence, and diligence” with respect to assumptions, calculations, and recommendations. Precept 1 of the code requires the actuary to “act honestly, with integrity and competence” and, as explained by Annotation 1-1, to perform actuarial services “with skill and care.”

Section 901.20(f) of the Joint Board’s regulations requires the enrolled actuary to disclose in “any report or certificate stating actuarial costs or liabilities a statement or reference describing or clearly identifying the data, any material inadequacies therein and the implications thereof, and the actuarial methods and assumptions employed.” Precept 4 of the code requires the actuary, when issuing an actuarial communication, to “take appropriate steps to ensure that the [a]ctuarial [c]ommunication is clear and appropriate to the circumstances and its intended audience and satisfies applicable standards of practice.”

Section 901.20(g) of the Joint Board’s regulations prohibits the enrolled actuary from advertising his or her enrolled status except on letterhead, business cards and telephone directory listings. Precept 11 of the code prohibits the actuary from engaging in advertising or business solicitation activities that the actuary knows or should know are false and misleading. Additionally, Precept 12 of the code requires actuaries to use designations and titles of the Academy and its sister organizations only in a manner consistent with the organizations’ authorized practices. The code makes no reference to advertising enrolled actuary status.

Section 901.20(h) of the Joint Board’s regulations requires the enrolled actuary to provide written notice to the appropriate federal agency upon discovering that any actuarial document he or she has signed was not filed. The code contains no comparable requirement.

ADDITIONAL CODE PROVISIONS

The code contains some requirements for which the Joint Board’s regulations appear

to contain no comparable language:

Precept 3 requires actuaries to ensure that work performed by them or under their direction meets applicable standards of practice (in the United States, the Actuarial Standards of Practice promulgated by the Actuarial Standards Board).

Precept 5 requires an actuary issuing an actuarial communication, as appropriate, to identify the principal(s) for whom the communication is issued and describe the capacity in which the actuary serves. Please note that enrolled actuaries typically use such language in making ERISA certifications.

Precept 6 requires the actuary to appropriately and timely disclose to present and prospective principals the sources of all direct and indirect material compensation the actuary or the actuary’s firm has received or will receive from another party in relation to an assignment that the actuary has performed or will perform for the principal. (With respect to compensation received by the firm, the actuary need only disclose sources of compensation that are known to, or reasonably ascertainable by, the actuary.)

Precept 9 requires the actuary to refrain from disclosing confidential information to another party unless authorized to do so by the principal or required to do so by law.

Precept 10 requires the actuary to perform actuarial services with courtesy and professional respect and to cooperate with others in the principal’s interest.

Precept 13 requires the actuary, upon learning of another actuary’s apparent material violation of the code, to either resolve the apparent violation with the other actuary or report it to the appropriate counseling and discipline body (in the United States, the ABCD).

Precept 14 requires the actuary to cooperate with the appropriate counseling and discipline body (in the United States, the ABCD), subject to applicable restrictions on confidential information and those imposed by law. ▲

2005 Pension Symposium—Pension Funding Reform

April 6-7, 2005
Washington Marriott Wardman
Park Hotel

4.2 EA core credits
4.2 EA noncore credits

Kicking off with the third general session of the Enrolled Actuaries Meeting, the symposium will convene a panel of distinguished professionals representing employers, employees, and the government to consider the following issues:

- Can pension funding reform contribute to the survival and even the reinvigoration of pension plans? If so, what would this reform need to look like?
- Can pension funding reform be the mechanism for enhanced retirement security in the United States?

The symposium will continue after the EA Meeting with thought-provoking sessions in four key areas:

- **Solvency**
- **Predictability**
- **Transparency**
- **Promises**

The symposium is co-sponsored by the Academy, the American Society of Pension Professionals & Actuaries, and the Society of Actuaries.

Attendance at the symposium is limited, so sign up early! Go to www.ccactuaries.org for registration information.

A WORD FROM THE EA MEETING COMMITTEE

Plan Now for the 2005 Enrolled Actuaries Meeting

ENROLLED ACTUARIES—come celebrate our 30th annual meeting April 3–6 at the Marriott Wardman Park Hotel in Washington.

The Enrolled Actuaries Meeting is the best way to keep up with our changing profession. You will be able to attend a variety of concurrent sessions, interact with representatives of the IRS and PBGC, and earn around 18 continuing education credits. This year's general sessions on professionalism and pension funding reform address important issues that are facing pension practitioners. The meeting committee is also keeping up with proposed legislation that affects funding requirements and will offer relevant sessions in those areas as they develop.

For the Monday luncheon speaker, we are pleased to have Paul Begala, a co-host of CNN's "Crossfire" and a research professor of government and public policy at Georgetown University, where he teaches undergraduates in the Department of Government and graduate students in the Georgetown Public Policy Institute. We should get an insightful and humorous perspective on our nation's politics.

As always, the EA Meeting is a great place to network with other pension professionals. Registration information is available at www.ccactuaries.org. All enrolled actuaries should also be receiving a brochure in the mail. Please contact the Conference of Consulting Actuaries (847-419-9090; cca@ccactuaries.org) if you haven't received yours.

Los Angeles Benefits Conference

Hilton Los Angeles/Universal City, CA
January 27-28, 2005

Co-Sponsored by:



- DB plan design and recent guidance
- 401(k) topics, including plan design, plan investments and plan revenue sharing
- 403(b) plans
- DOL updates
- The effect of Enron on plan governance
- ERISA litigation update
- How Do You Handle an IRS Audit?
- Health and Welfare plan update
- Aftermath of mutual fund scandals
- Case studies in correction under EPCRS—practical advice from the experts
- The CPA plan audit: Issues from the IRS', CPA's and DOL's perspectives
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For more information, contact the ASPPA Meetings Department at 703.516.9300 or meetings@asppa.org