



AMERICAN ACADEMY of ACTUARIES

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Procedures for Review of Qualifications for Signing NAIC Property and Casualty Annual Statement Loss Reserve Opinion

The Instructions to the National Association of Insurance Commissioners (NAIC) Property and Casualty Blank define a “qualified actuary,” for purposes of signing a Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement as “a person who meets the basic education, experience and continuing education requirements of the Specific Qualification Standard for Statements of Actuarial Opinion, NAIC Property and Casualty Annual Statement, as set forth in the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States, promulgated by the American Academy of Actuaries, and is either:

- (i) a member in good standing of the Casualty Actuarial Society, or
- (ii) a member in good standing of the American Academy of Actuaries who has been approved as qualified for signing casualty loss reserve opinions by the Casualty Practice Council of the American Academy of Actuaries.”

Other individuals may be approved by the domiciliary commissioner upon request by the insurer through procedures adopted in each state.

All signing actuaries, both Casualty Actuarial Society (CAS) and American Academy of Actuaries (Academy) members, must meet both the “General Qualification Standard” and the “Specific Qualification Standard” relevant to the type of opinion being issued as set forth in the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States (Including Continuing Education Requirements) effective January 1, 2008 (herein referred to as the U.S. QS). The Casualty Practice Council (CPC) reviews the qualifications of Academy members to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement in accordance with the procedures set forth below.

Procedures for Review of Qualifications

1. Submission of Requests for Review of Qualifications

A member of the Academy who is not a member of the CAS, but who believes that he or she satisfies the U.S. QS Specific Qualification Standard for signing the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement, may submit a Request for Review of Qualifications to the attention of the Casualty Policy Analyst of the Academy to obtain the Academy’s approval to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement. A copy of this form is attached.

Members in good standing of the CAS who meet the basic education, experience, and continuing education requirements of the Specific Qualification Standard for Statements of Actuarial Opinion,

NAIC Property and Casualty Statement, as set forth in the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States, promulgated by the Academy, are already defined by the NAIC's Annual Statement Instructions to be "qualified actuaries." Members in good standing of the Academy who are also members in good standing of the CAS and who meet the U.S. Qualification Standards by virtue of their designation and the underlying examinations and education requirements need not apply for a review of their qualifications.

To be qualified to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement, CAS members are subject to applicable regulatory requirements, the U.S. Qualification Standards, and the Code of Professional Conduct. Some CAS designees may not meet the U.S. Qualification Standards by virtue of their designation and the underlying examinations and education requirements. For further guidance about that category of actuary, see [Requirements for ACAS to Issue NAIC PC Opinions Clarified for the 2011 CAS Syllabus by Mary Frances Miller and David Menning](#).

Requests are to be mailed to:

Casualty Policy Analyst
American Academy of Actuaries
1850 M Street NW
Suite 300
Washington, DC 20036

2. Administrative Processing

Upon receipt of the Request for Review of Qualifications, Academy staff will ascertain whether all accompanying materials required to be submitted with the request are present and whether the form has been properly completed. Any incomplete requests will be returned to the applicant with a list of the additional materials that must be submitted before consideration of the request will be undertaken.

Academy staff will circulate copies of the completed Request for Review of Qualifications to the members of the CPC in accordance with its procedures.

3. Consideration by the CPC

The CPC will review the Request for Review of Qualifications and vote, in accordance with its procedures, on whether the applicant meets the qualifications to sign the statement on casualty loss reserves. An affirmative vote that the applicant has met the minimum requirements of the Specific Qualification Standard for signing Statements of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement by at least two-thirds of all CPC members is necessary for approval.

The CPC may:

- a. Approve the Request for Review of Qualifications without limitations;
- b. Disapprove the Request for Review of Qualifications in its entirety; or
- c. Determine that the applicant is qualified to sign a Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement only in limited, specifically-identified circumstances. The circumstances of such a limitation may relate to particular lines or

blocks of business, identified insurers, or any other limitations deemed appropriate by the CPC in its sole discretion.

At any time, the CPC may request additional information from the applicant that it deems necessary to evaluate the applicant's qualification to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement.

4. Notification of Approval

Upon approval, the Chairperson of the CPC will advise the applicant in writing that the CPC has determined that the applicant has satisfied the requirements for signing the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement. Any limitations that the CPC has imposed on its approval will be described to the applicant in said correspondence.

If the applicant fails to receive at least a two-thirds affirmative vote from the CPC, in accordance with its procedures, the applicant will be informed as to how the application failed to demonstrate qualification to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement and will be advised of the right to seek reconsideration as described below. This approval applies only to the NAIC Property and Casualty Annual Statement Actuarial Opinion and not to any other type of statement of actuarial opinion that may be issued by an actuary.

5. Requests for Reconsideration

If an applicant fails to obtain at least a two-thirds affirmative vote from the CPC to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement, the applicant may request reconsideration. The request for reconsideration should be submitted to the attention of the Casualty Policy Analyst of the Academy and should include a specific response to the CPC's explanation of how the application has failed to demonstrate qualification to sign the Statement of Actuarial Opinion on loss reserves for the NAIC Property and Casualty Annual Statement, together with any additional supporting documentation that the applicant wishes to submit.

The CPC will review any request for reconsideration submitted upon disapproval of a prior Request for Review of Qualifications. For approval on reconsideration, at least two-thirds of the members of the CPC must agree that the individual has demonstrated compliance with the Specific Qualification Standard for signing loss reserve opinions. All decisions of the CPC on reconsideration shall be final.



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Request for Review of Qualifications for Signing the NAIC Property and Casualty Loss Reserve Opinion Annual Statement

Please complete each part of this form.

Name:

Address:

Telephone:

Actuarial Credentials:

The Specific Qualification Standard under Section 3 of the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States (Including Continuing Education Requirements) effective January 1, 2008 (herein referred to as the U.S. QS) for members signing the NAIC Property and Casualty Loss Reserve Opinion Annual Statement requires professional achievement in three areas: education, experience, and continuing education. Each of these subjects constitutes a separate part in this following Request for Review of Qualifications.

Please indicate the areas for which you believe your qualifications satisfy the Specific Qualification Standard (check one):

- | | (a) All areas of loss reserve assignments;
- | | (b) The following specific areas of loss reserve assignments (*indicate, for example, particular lines/blocks of business or specific companies*):

Part I: Education

The U.S. QS General Qualification Standard (under Section 2.1) requires, among other things, the member to be knowledgeable, through examination or documented professional development, of the law applicable to the Statement of Actuarial Opinion.

In addition, under Section 3 of the U.S. QS, the following syllabus topics from the Casualty Actuarial Society examinations are required for satisfaction of the Specific Qualification Standard for signing the Statement of Opinion, NAIC Property & Casualty Annual Statement:

- (1) Policy forms and coverages, underwriting and marketing;
- (2) Principles of ratemaking;
- (3) Statutory insurance accounting and expense analysis;
- (4) Premium, loss and expense reserves; and
- (5) Reinsurance.

Alternatively, the member may satisfy the education requirement of the Specific Qualification Standard by acquiring comprehensive knowledge of the applicable syllabus topics through responsible work and/or self-study. In advance of making a statement of actuarial opinion, the member must have obtained a signed statement from another actuary who is qualified to issue Statements of Actuarial Opinion under the Specific Qualification Standard for the Statement of Actuarial Opinion, NAIC Property & Casualty Annual Statement, and must provide a copy of such a statement with the Request for Review of Qualifications.

1. *Please describe how you have obtained the comprehensive knowledge of the applicable law and each of the applicable syllabus topics through examinations and/or through responsible work and study necessary to satisfy the education requirement of the Specific Qualification Standard for signing the Statement of Opinion, NAIC Property & Casualty Annual Statement. Please specifically note any limitations on the scope of your work and study that should be considered by the Casualty Practice Council in reviewing your qualifications. Such limitations might include, but are not necessarily limited to, particular blocks or lines of business or specific insurers. Documentation on studies should include information on formal examinations taken and passed, the examining authority, etc.*

(Attach additional sheets as required.)

2. As noted above, in advance of making a public statement of actuarial opinion, a member who has not successfully completed the required examinations must obtain a written statement from a qualified actuary regarding the member's knowledge of the applicable syllabus topics. *Please attach a copy of the qualified actuary's statement to this Request for Review of Qualifications. Please note that your Request for Review of Qualifications cannot be processed unless such a statement has been submitted. As a guide, see Attachment A.*

The Casualty Practice Council will take into consideration the written statement from the qualified actuary and any other information that the Council believes to be relevant in reaching a decision on the Request for Review of Qualifications.

3. **Statement of Review of Applicable Materials**

I hereby certify that I have reviewed the statements of principles issued by the Board of Directors of the Casualty Actuarial Society, as well as the U.S. QS, all applicable Standards of Practice regarding casualty loss reserving and related matters issued by the Actuarial Standards Board, and the [Practice Note on Statements of Actuarial Opinion on P&C Loss Reserves](#). Should my Request for Review of Qualifications be approved by the Casualty Practice Council, I will adhere to applicable Standards of Practice in my loss reserve opinion assignments.

(Signature)

(Date)

Part II: Experience

The Specific Qualification Standard requires that the actuary obtain at least three years of responsible experience relevant to the subject of the Statement of Actuarial Opinion under review by an actuary who was qualified to issue the Statement of Actuarial Opinion at the time that the review took place.

1. *Please describe the three years of recent, relevant experience you have that you believe satisfies the experience requirement of the Specific Qualification Standard. For example, describe the kinds of assignments for which you have been responsible, including examples of certifications and/or opinions you have submitted. Please specifically note any limitations on the scope of your experience that should be considered by the Casualty Practice Council in reviewing your qualifications (such limitations might include, but are not necessarily limited to, particular blocks or lines of business, or specific insurers):*

(Attach additional sheets as required.)

2. *Please identify the qualified actuary or actuaries who have reviewed your work for at least three years of your total experience. The actuary (or actuaries) may have been a superior, subordinate, peer, or outside consultant:*

*Please attach a copy of the qualified actuary's statement to this Request for Review of Qualifications. **Please note that your Request for Review of Qualifications cannot be processed unless such a statement has been submitted.** As a guide, see Attachment B. It may be sufficient to have only a single actuary attest to the actuary's experience, provided that the attesting actuary has knowledge of the qualifications of the other reviewing actuary(ies). If the same actuary attests to both the applicant's education and experience, a single letter may be submitted covering both topics.*

3. *If you wish, you may attach copies of any loss reserve opinions and/or certifications as evidence of your recent, relevant experience to assist the Casualty Practice Council in reviewing the degree to which you have satisfied the minimal requirements of the Specific Qualification Standard for Statements of Opinion, NAIC Property & Casualty Annual Statement. Redacted material is permissible. **Please do not include any confidential material or material of a proprietary nature.***

4. *Please state whether you have signed a P&C opinion in the past 10 years. If yes, unless prohibited from doing so by applicable law, please identify the company, describe the circumstances of your signing such an opinion, and identify the source of the approval you received to sign such an opinion. If disclosure of this information is limited by applicable law, please provide us with the applicable law, rule, or regulation that limits such disclosure.*

Part III: Continuing Education

The U.S. QS require continuing education to be relevant to the area of practice of the statement of actuarial opinion being issued. The minimum required continuing education credits under the U.S. QS that are necessary to maintain qualification in a particular area of practice may not always be sufficient, particularly in areas where change is occurring rapidly.

The U.S. QS requires the following at a minimum:

Thirty credit hours per year of relevant continuing education activities are necessary to satisfy the continuing education requirement, including a minimum of 15 credits directly relevant to the topics listed in Part I. A minimum of six of the 15 credits must be obtained through “organized activities,” as defined in the U.S. QS, and a minimum of three hours must cover professionalism topics.

For additional information on the continuing education requirements, please see *Qualification Standards for Statements of Actuarial Opinion in the United States* at <http://actuary.org/qualstandards/>.

Please submit copies of your continuing education records for the last two years. If you wish to submit continuing education records for prior years as well, you may do so.

Statement of Compliance

I hereby certify that I have reviewed the requirements for continuing education contained in the U.S. Qualification Standards and that I have satisfied the requirements for continuing education relevant to the Specific Qualification Standard, Statement of Opinion NAIC Property & Casualty Annual Statement, for the year _____.

(Signature)

(Date)

Attachment A

Sample Letter
Attesting to the Applicant's Knowledge of Casualty Syllabus Topics

To the Casualty Practice Council:

I have been requested by _____ [applicant], M.A.A.A., to provide a written statement regarding the applicant's knowledge of the specific supplemental examination topics required by Section 3 of the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States (effective January 1, 2008) (QS), Specific Qualification Standards for signing the NAIC Property and Casualty Loss Reserve Opinion. I meet the Specific Qualification Standards, based upon my education, experience, and continuing education. I hold the following actuarial credentials:

_____.

I note that in order to meet the education requirement of the QS, a member must have comprehensive knowledge, through work or study, of the law applicable to Statements of Actuarial Opinion – NAIC Property and Casualty Insurance, the identification, evaluation, and management of risk, relevant policy forms and coverages, underwriting and marketing, principles of ratemaking, statutory insurance accounting and expense analysis, reinsurance, and premium, loss, and expense reserves.

Based upon my knowledge of _____ [applicant], it is my opinion and belief that the applicant has gained comprehensive knowledge of these subjects necessary to meet the education requirements of the Specific Qualification Standard of the QS for statements of opinion on loss reserves through the following responsible work and/or self-study: _____. It is my belief that the applicant's satisfaction of these minimum education requirements is sufficient to enable the applicant to engage in

[choose one]

(a) all areas of loss reserving;

(b) the following areas of loss reserving (state any limitations by line or block of business or particular insurer):

In so stating, I take no responsibility for the accuracy, completeness, or quality of any work undertaken by _____ [applicant].

Sincerely yours,

(Signature)

(Date)

Attachment B

***Sample Letter
Attesting to the Applicant's Experience***

To the Casualty Practice Council:

I have been requested by _____ [applicant], M.A.A.A., to provide a written statement regarding his/her experience relevant to the topics covered by the NAIC Property and Casualty loss reserve opinion. I meet Section 3 of the Qualification Standards for Actuaries Issuing Statements of Actuarial Opinion in the United States (effective January 1, 2008) (QS), the Specific Qualification Standards, based upon my education, experience, and continuing education. I hold the following actuarial credentials: _____.

I note that in order to meet the experience requirement of Section 3 of the QS, a member must have a minimum of three years of responsible experience relevant to the subject of the Statement of Actuarial Opinion under review by an actuary who was qualified to issue the Statement of Actuarial Opinion at the time that the review took place.

_____ [applicant] worked under my supervision/review [and that of (name)] from _____ to _____. During that time, the applicant _____ [describe the relevant work performed by applicant] _____. It is my belief that the applicant's experience is sufficient to enable the applicant to engage in

[choose one]

(a) all areas of loss reserving;

(b) the following areas of loss reserving (state any limitations by line or block of business or particular insurer):

In so stating, I take no responsibility for the accuracy, completeness, or quality of any work undertaken by _____ [applicant].

Sincerely yours,

(Signature)

(Date)