



February 13, 2018

Mr. Kent Sullivan
Commissioner of Insurance
Texas Department of Insurance
PO Box 149104
Austin, TX 78714-9104

**Subject: Open Meetings for Actuarial Standard Setting
Definition of Qualified Actuary in Texas Insurance code**

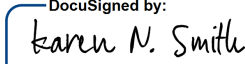
Dear Mr. Sullivan:

I am a resident of Texas and an actuary. In January 2018, the American Academy of Actuaries (the 'Academy') abruptly, and without prior notice, adopted a very restrictive open meeting policy. The Academy closed all meetings of the Committee on Qualifications and observers may attend meetings of the Actuarial Standards Board ('ASB') only with approval of the ASB chair, with such approval left to the chair's complete discretion as to whom to admit and whom to exclude. Previously, the Academy had a broad open meeting policy. This new lack of transparency is not good for the profession or the public. It would potentially allow personal bias or an individual company's financial interest to taint the process.

NAIC instructions reference membership in the Academy and meeting the Qualification Standards of the Academy. Texas Insurance Law references membership in the Academy in Section 802.002(1). Thus, Texas is delegating some actuarial items of insurance regulation to the Academy. As such, the Academy should have a high level of transparency. Closed meetings are inconsistent with open government and the extremely robust open meeting policy of the NAIC.

I am asking for you to support my effort to reverse the Academy's action so that actuarial and qualification standards meetings will be open again. You can find the Academy's website at actuary.org. You can find my website at ASBCoQsunshine.com. Thank you for any assistance you can provide in this matter.

Sincerely,

DocuSigned by:

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Karen Smith

karens@asbcoqsunshine.com

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