# An Update on CAS CE Requirements and Opportunities The CE Compliance and Audit Process

Leslie Marlo, VP - Administration 2012 CAS Spring Meeting May 22, 2012

## **CAS CE Attestation Process**

- CAS members asked to certify compliance with CAS
   CE Policy at end of each calendar year
  - 1st Calendar Year-End was December 31, 2011
- Current Status (as of April 27, 2012)
  - 5,579 members
  - 4,511 certified compliance (80.9%)
  - 811 certified "not providing actuarial services" (14.5%)
  - 257 not compliant (4.6%)
  - Not compliant could be either truly not compliant or could be no response

## **CAS CE Compliance Committee**

- Committee formed and charge approved by Executive Council in July 2011
- The CAS CE Compliance Committee is responsible for administering the CE Compliance Review process to verify accuracy in the attestation of compliance for continuing education for members of the CAS.
   Administration includes review of compliance documentation and resolution of any issues that may arise from such review.
- On an annual basis, the CE Compliance Committee randomly selects a sample of 1% of the membership certifying compliance to audit. In addition, all CAS members serving on the CAS Board of Directors and CAS Executive Council will be audited annually. Members selected to be audited will be required to submit acceptable supporting CPE documentation to the CE Compliance Committee to verify compliance. As a function of the CE review process, members may be required to provide additional documentation as requested by the CE Compliance Committee to support compliance.

## **CAS CE Compliance Review Process**



<u>January 30</u>: Members notified that they may be selected for review of their CE activities. Importance of retaining documentation is reinforced.

<u>February 15</u>: Random sample of 1% of those certifying compliance selected for the audit. Plus all CAS Board of Directors and Executive Council members.

<u>March 1</u>: CAS Member Resource Center contacts selected members requesting CE documentation to be submitted to CAS Office within 4 weeks. Reminders and follow-up as needed.



March/April: Support documents collected by CAS Member Resource Center.

May: CAS Member & Volunteer Coordinator compiles CE records, redacts, and performs cursory review in preparation for CE Compliance Committee review.



<u>June / July</u>: CE Compliance Committee reviews. Questions / communication with audited members to be conducted through CAS Member Resource Center to preserve confidentiality.

<u>August 30</u>: Audit cycle complete. Audited members to receive letter outlining the results of the review and thanking them for their cooperation.

## **CAS CE Compliance Committee**

- Current Status for 2011 Review Process
  - All members subject to audit have submitted their documentation to CAS Member Resource Center
  - CE Compliance Committee has had several pre-review meetings to set baseline expectations and understanding of the process

## **CAS CE Compliance Committee**

#### Considerations

- Recognition that CE activities not black and white
- Process is meant to be educational not punitive
- Each member will have responsibility for reviewing 5 − 6 submissions
- Committee members with experience outside U.S. (e.g. Canada, U.K., Australia) will take any submissions relevant to those CE Standards
- Any submission that requires discussion will be reviewed by the entire CE Compliance Committee
- Any submission where CE Compliance Committee does not reach consensus will be brought to Executive Council for final review

## **Confidentiality of Member Logs**

- The CAS retains the right to use evidence of discrepancies found in the log for member education and counseling as well as in investigations or disciplinary proceedings.
- The CAS will make reasonable efforts to keep confidential all information provided to the CAS for purposes of the audit.
   Persons involved in an audit or who have responsibility to review the audit findings and conclusions will be informed that the CAS desires that the information subject to audit be kept confidential.

## **Confidentiality of Member Logs**

- The CAS may be required by court order or other administrative process to provide certain information obtained during the course of an audit to third parties.
- The CAS may also be required to provide this information to third parties in conjunction with the investigation of an actuarial discipline matter.
- In any such event the CAS will make every effort to notify the subject actuary of its intent to provide the information to a third party.

# **CAS CE Compliance Questions**

Does reading insurance industry literature count as CE?

Does volunteer Committee work count as CE?

Does authoring an article count as CE?

### Presenter's contact details

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