



April 24, 2020

By Electronic Mail

Thomas V. Curtin
Executive Director
Joint Board for the Enrollment of Actuaries
SE:RPO
1111 Constitution Ave., NW
REFM, Park 4, Floor 4
Washington, DC 20224-0002

Re: Request for Continuing Education relief due to Coronavirus impact

Dear Mr. Curtin:

The purpose of this letter is to request temporary relief from the formal program requirement for continuing education. Due to restrictive stay at home measures currently in place across the country to prevent the spread of Coronavirus, enrolled actuaries are currently unable to meet the formal program requirements in Joint Board regulations. As a result of these restrictions, there are substantially fewer face-to-face seminars and conferences being conducted.

As you are aware, Joint Board regulations state that “a qualifying program qualifies as a formal program with respect to a participant if the participant simultaneously participates in the program in the **same physical location** with at least two other participants engaged in substantive pension service...” Also, “groups of three or more participants who are in the **same physical location** may participate in a formal program in person or via the internet, video conferencing, or teleconferencing” (emphasis added, section 901.11(f)(2)(ii) of the Joint Board of Regulations).

Beginning in March 2020, the American Society of Enrolled Actuaries has moved educational presentations to an exclusively online format. We request that the Joint Board consider relief for enrolled actuaries so that continuing education completed during a stay at home order, or a period of time specified by the Joint Board (such as March 1, 2020, to July 1, 2020), be considered to meet the formal program requirement.

If you have any questions or wish to discuss, please contact me at mpippins@usaretirement.org.

Sincerely,

A handwritten signature in black ink that reads "Martin Pippins".

Martin Pippins, MSPA, EA
Executive Director, American Society of Enrolled Actuaries