



November 30, 2020

Executive Deputy Superintendent My Chi To, Co-Chair
Superintendent Eric Cioppa, Co-Chair
Special (EX) Committee on Race & Insurance
Workstream 1 – D & I in the Industry
National Association of Insurance Commissioners
1100 Walnut Street
Suite 1500
Kansas City, MO 64106

Via Electronic Mail: mmcdonald1@naic.org; cbradstreet@naic.org

Re: Workstream 1 - D& I Collaboration

Dear Executive Deputy Superintendent To and Superintendent Cioppa:

The American Property and Casualty Insurance Association (APCIA) appreciates the opportunity to present the good work that the insurance industry has been engaged in to promote and advance diversity, equity and inclusion (DEI). Insurers have an ongoing commitment to continuous improvement and are currently reviewing all aspects of operations to determine how the industry can play a larger and deeper role in addressing DEI broadly. APCIA and our member companies increased our focus on talent and workforce diversity as key industry priorities in 2015 as founding members of the Insurance Careers Movement and spearheading the Emerging Leaders program—initiatives to promote industry career recruitment and retention. That was just the beginning of a long-term commitment.

Like the National Association of Insurance Commissioners (NAIC), APCIA also created avenues for member companies to learn from each other through shared experiences and brainstorming new ideas. For example, we have a group of company diversity and inclusion officers that meet as well as an APCIA Board Working Group on Social Equity and Inclusion, which regularly discusses DEI issues. An important outcome of these conversations is an APCIA partnership with Aon’s Ward Group and Plus Ulte to develop an industry Diversity and Inclusion Catalog (DEI Catalog). The DEI Catalog is an anonymized census of DEI policies, programs, and practices of member companies. This year is our inaugural effort, which will become a benchmark for APCIA and will be updated on a biennial or triennial basis.

We continue to analyze the results, but preliminary observations show a predominant number of respondents have established and adopted DEI as part of their core values and strategic goals regardless of company size or geographic locations. Examples of these policies and goals include: inclusive workplace policies, manager education, pay equity analysis, recruitment engagement goals for diverse talent, board diversity, and others.

This evidences that there is a strong foundation and companies are now working to build on that to embed DEI into their business and talent practices. Companies are identifying how they can take the core values and translate them into actionable measurable objectives at operational levels. The DEI Catalog can help companies to look at their own corporate actions and take what they have learned and determine how to prioritize or identify new opportunities based on their own individual corporate goals and values. As we think through the benchmarking aspect and ideas for implementation, some themes start to emerge. For instance, the importance of allyship opportunities. It is critical for individuals to recognize the significance of advocating for someone that may not be in the room and to find ways to be a mentor and coach to help guide others through their professional development. Relatedly, apprenticeships are a powerful tool to introduce individuals to insurance. Individuals that may not otherwise have easy access to this career path or even know that it is an option. Additionally, identifying leadership development programming for underrepresented groups can be helpful.

As requested on the recent Workstream 1 conference call, we continue to think through concrete examples of how industry and regulators can partner. However, we offer that the value of collaborating and partnering to advance opportunities in the areas of allyship and apprenticeships should not be understated. Collaborating in these areas can lead to robust and holistic DEI efforts.

Thank you for the opportunity to comment. APCA looks forward to working with Workstream One and the Special Committee more broadly.

Respectfully,



Angela Gleason
Senior Director, Cybersecurity & Counsel