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Rachel Hemphill

Chair, Life Actuarial (A) Task Force (LATF)

Re: Re-Exposure of APF 2021-08 (VM-51 Data Call Lag Reduction)

Dear Ms. Hemphill:

The American Council of Life Insurers (ACLI) appreciates the opportunity to submit comments on the re-exposure of APF 2021-08 on reducing the VM-51 Data Call Lag reduction from two years to one year. We support this update, but we have a clarifying question and a request.

The updated language for reported terminations suggests that companies can use any date so long as it is on or after 4/1/20XX+1. We wanted to confirm that the flexibility for the reporting cutoff will not generate any errors in submission or processing. Perhaps to accommodate companies that currently are comfortable with their existing processes, the language defaults to the current with the allowance for the earlier cutoff:

- i. Report terminations that were incurred in calendar year 20XX and reported before July 1, 20XX+1. **Companies may report terminations through April 1, 20XX+1, if they choose.** However, exclude rescinded policies (e.g., 10-day free look exercises) from the data submission.

Consistent with the prior occurrence in which two years of data were submitted concurrently, we request the NAIC continue to provide flexibility around the timing of individual company submissions to account for this one-time impact.

Thank you once again for consideration of our comments and we are looking forward to continued conversations with LATF on this topic.

Sincerely,

B. Banfield Colin Masterson

cc: Scott O'Neal, NAIC