August 18, 2023

Erica Weyhenmeyer  
Chair, Market Conduct Annual Statement Blanks (D) Working Group  
NAIC

Rebecca Rebholz  
Vice Chair, Market Conduct Annual Statement Blanks (D) Working Group  
NAIC

Re:  Consideration of MCAS Filing Deadlines for Other Health and Short-Term, Limited Duration (STLD) Lines of Business

Dear Ms. Weyhenmeyer & Ms. Rebholz:

Thank you for the opportunity to comment on the consideration of the filing deadline for the Other Health MCAS. We are writing in support of the Health Industry Interested Parties’ request to set a permanent May 31st deadline for the Other Health MCAS. ACLI does not represent STLD but has no concerns with a May 31st deadline for the STLD MCAS.

ACLI’s member companies are committed to providing accurate, valuable data and worked closely with the subject matter expert group and MCAS Blanks Working Group in developing the Other Health MCAS. Companies devote many resources to MCAS reporting and would be appreciative of a May 31st deadline. Given the additions to MCAS reporting, as well as other required reporting such as financial reporting being due in the same timeframe, it would be helpful to have more time to respond. When this request was discussed with the MCAS Blanks Working Group, regulators indicated that the suggested deadline of May 31st would give enough time to analyze the reported data. Thank you again for your time and the opportunity to comment. I would be glad to answer any questions or discuss further.

Sincerely,

Rikki Pelta