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September 10, 2020

Andy Beal, Chief Operating Officer & Chief Legal Office
National Association of Insurance Commissioners (NAIC)
Central Office
1100 Walnut Street
Suite 1500
Kansas City, MO 64106-2197

VIA Email: abeal@naic.org

RE: NAIC's Special Committee on Race and Insurance Sept 17, 2020, WebEx

Dear Mr. Beal:

On behalf of IRI, the leading national trade association for the entire supply chain of insured retirement strategies, including life insurers, asset managers, and distributors such as broker-dealers, banks and marketing organizations, we commend NAIC on the creation and workplan of the Special Committee on Race and Insurance. Please accept this communication as an initial outline of comments we would like to share at the September 17, 2020, WebEx meeting of the Special Committee.

IRI initiated a Diversity, Equity, and Inclusion (DEI) Board Working Group in June of this year. Our intent is to collaborate with member companies, other industry organizations, and policymakers, such as NAIC, to identify industry DEI best practices that could be embraced and implemented across the entire supply chain of the financial services industry.

In addition to the Board Working Group, IRI also initiated a DEI Steering Committee, comprised of 22 DEI professionals and champions from our member companies. This group has been meeting monthly to identify and focus its scope of work. We recognize there are many populations that are subsets of a DEI program. The initial focus of the IRI Board Working Group and Steering Committee will be on the black population with a particular focus on talent acquisition and retention within the industry.

We share the Special Committee's goal to research current DEI programming underway within the industry. Our intent is to work with member companies to benchmark the tactics in use at each organization such that we promote industry-wide adoption of best practices. Our approach will involve helping companies see opportunity rather than working from a place of criticism. Our work is beginning, but we have already felt the passion and commitment from our member companies and their leadership teams.

We look forward to working with the Special Committee and its incoming Director, Evelyn Boswell to learn more about the past, current and future diversity, equity and inclusion focus of IRI members, and additionally, to connect equally with all our employees, customers and corporate and policy leaders.

Thank you for the opportunity to provide our initial comments. We look forward to discussing the IRI DEI effort in greater detail on September 17, 2020.

Sincerely,

Christina Brady
VP, Strategy & Operations

Shani Armon
VP, Marketing & Business Development

Liz Pujolas
Dir, State Affairs