

## FROM THE NAIC CONSUMER REPRESENTATIVES

November 20, 2025

**To: Glen Mulready, Chair; Grace Arnold, Co-Vice Chair; Ann Gillespie, Co-Vice Chair, Health Insurance and Managed Care (B) Committee**

**RE: Consumer Representatives' Comments on Draft 2026 Charges for the Health Insurance and Managed Care (B) Committee**

On behalf of the undersigned Consumer Representatives to the National Association of Insurance Commissioners (NAIC), we are pleased to provide the following comments on the proposed 2026 charges for the Health Insurance and Managed Care (B) Committee.

### **Health Insurance and Managed Care (B) Committee**

First and foremost, we urge B Committee to adopt language reflecting its commitment to addressing disparities in insurance access and affordability. The NAIC showed bold leadership in launching its Special Committee on Race and Insurance (SCORI), and while that work stream was disbanded last year, it was done so with the understanding that the commitment to addressing disparities would be incorporated into existing work streams. We urge the Committee to consider adding the following:

- **Examine factors contributing to disparities in coverage and affordability and recommend appropriate steps to reduce those disparities.**

We appreciate that consistency of charges across multiple years provides a longer window to focus attention and resources on particular issues and priorities. However, given the specific and acute challenges facing health insurance markets and the consumers they serve – including anticipated coverage losses affecting millions of consumers across in the individual market and Medicaid – we believe B Committee has an opportunity to provide a venue to discuss and address these challenges. We urge the Committee to consider the following changes to its proposed 2026 charges:

- **Examine factors that contribute to rising health care costs and insurance premiums as well as coverage losses. Review state initiatives to address cost drivers, consumer affordability, and coverage continuity.**

### **Consumer Information (B) Working Group**

We urge the Working Group to adopt the following additional charges:

- **Identify communication goals, strategies and tactics to reach communities that experience inequities in health insurance access, including through partnerships with community-based organizations.**

### **Health Innovations (B) Working Group**

We urge the Working Group to amend its charges as follows:

- Discuss state innovations related to health care—i.e., access, insurance plan designs, underlying medical and prescription drug costs, stability for health care and insurance as a whole, health insurer and provider consolidation or competition, the use of data in regulatory and policy decision making, and health care delivery and financing models—to achieve better patient outcomes, **reduce disparities in coverage and affordability**, and lower spending trends.

### **Senior Issues (B) Task Force**

We urge the Task Force to amend its charges as follows:

- Develop appropriate regulatory standards and revisions, as necessary, to the NAIC models, consumer guides, and training material on LTCI, including the study and evaluation of evolving LTCI product design, rating, suitability, and other related factors. Monitor ongoing research and maintenance of guidance regarding reduced benefit options (RBOs) and make necessary modifications to the *Long-Term Care Insurance Model Act* (#640) and the *Long-Term Care Insurance Model Regulation* (#641). **Support regulator conversations to work across state agencies to identify innovative and systemic policy solutions to address the growing need for long term care services and public and private financing mechanisms to pay for care.** Work with federal agencies, as appropriate.
- **We also urge the Task Force to identify a specific LTCI working group to support deeper discussion and problem solving around growing long-term care access and affordability gaps.**

### **Health Actuarial (B) Task Force**

*We support continuing the current charges as is, without change.*

We look forward to working with the B Committee in the coming year.

Sincerely,

Kellan Baker  
Chuck Bell  
Bonnie Burns  
Jalisa Clark  
Lucy Culp  
Deborah Darcy  
Shamus Durac  
Joe Feldman  
Adam Fox  
Stephanie Hengst

Claire Heyison  
Anna Schwamlein Howard  
Anna Hyde  
Janay Johnson  
Amy Killelea  
Erin Miller  
Carl Schmid  
Jennifer Snow  
Deb Steinberg  
Wayne Turner  
Milo Vieland  
Caitlin Westerson  
Silvia Yee