

From: Veronikis, Karen <kveronikis@pa.gov>

Sent: Thursday, March 14, 2024 11:18 AM

To: Helder, Randy <RHelder@naic.org>

Subject: NAIC NOTICE: Fraternal Comments - Market Analysis Procedures (D) WG - Feb. 26

Good afternoon Randy,

Pennsylvania's comments for removing the MCAS filing exemption for Fraternal Companies remains unchanged from our original submission on 7/7/2023.

Verification with our Legal Department was completed. There was no legal reason found that Fraternal Companies would be exempt from submitting MCAS. After discussions with the Deputy Commissioner of the Office of Market Regulation, Pennsylvania is in favor of Fraternal Companies submitting MCAS using the same threshold guidelines used for life, annuity, PPA, and homeowner.

Thank you for your consideration.

Karen Veronikis

Karen Veronikis, MCM | Chief, Division of Market Analysis| CCRC Exam Manager

Pronouns: She/Her

Pennsylvania Insurance Department | Bureau of Market Actions

1321 Strawberry Square | Harrisburg, PA 17120

Phone: 717.787.0165

www.insurance.pa.gov

Twitter: [@PAInsuranceDept](https://twitter.com/PAInsuranceDept)

Facebook: [Facebook.com/PAInsuranceDepartment](https://www.facebook.com/PAInsuranceDepartment)