Brian Bayerle
Chief Life Actuary
202-624-2169

Colin Masterson
Sr. Policy Analyst
202-624-2463

September 10, 2026

Rachel Hemphill
Chair, NAIC Life Actuarial (A) Task Force (LATF)

Re: Historic Mortality Improvement (HMI) and Future Mortality Improvement (FMI) 2026 Recommendation

Dear Chair Hemphill:

The American Council of Life Insurers (ACLI) appreciates the opportunity to comment on the 2026 recommended changes to the HMI and FMI methodology. ACLI would also like to commend the Society of Actuaries' s Life Mortality Improvement Subgroup for their efforts in developing these recommendations and creating and presenting the associated materials.

The revised recommendation reflects the best judgment of the Subgroup based on the data sources under consideration so we support the adoption of the updated scales.

Consistent with our comments at the NAIC Summer National Meeting, we would support a conversation around development and maintenance of the HMI-FMI process. We would like to explore enhanced governance around the process. Additionally, we would like discussion of potentially incorporating additional data sources that could better capture emerging trends (such as anticipated mortality impacts of things like GLP-1 drugs and other medical advancements) and explore a shorter grading period from HMI to MI long term rate. ACLI will plan to develop a discussion document for a future LATF meeting.

Thank you all once again for the opportunity to provide this feedback and we welcome any questions that LATF members and NAIC staff may have.

Sincerely,

B Bayerle Colin Masterson

CC: Scott O'Neal and Amy Fitzpatick, NAIC