

**Paul Graham**

Senior Vice President, Policy Development

May 14, 2021

Mr. David Altmaier

Co-Chair, NAIC Special (EX) Committee on Insurance and Race

Mr. Dean Cameron

Co-Chair, NAIC Special (EX) Committee on Insurance and Race

Mr. Raymond Farmer

Chair Emeritus NAIC Special (EX) Committee on Insurance and Race

Mr. Andrew Mais

Co-Vice Chair, NAIC Special (EX) Committee on Insurance and Race

Ms. Chlora Lindley-Myers

Co-Vice Chair, NAIC Special (EX) Committee on Insurance and Race

Re: NAIC Special (EX) Committee on Insurance and Race 2021 Proposed Charges

Dear Messrs. Altmaier and Cameron et al:

The American Council of Life Insurers (“ACLI”) appreciates the opportunity to provide comments on the NAIC Special (EX) Committee on Insurance and Race (“Special Committee”) 2021 proposed charges. We are aligned with a goal to help address systemic inequalities, and we are encouraged by the discussions taking place at the NAIC to address this critical societal issue. ACLI is committed to working with the NAIC at all levels to address concerns of fairness and improve accessibility of insurance products to all communities.

ACLI supports the spirit of the proposed charges laid out by the Special Committee. ACLI would recommend the inclusion of charges to the Life Actuarial (A) Task Force (“LATF”) and the Health Actuarial (B) Task Force (“HATF”) that would ensure that LATF and HATF are involved in actuarial and risk classification issues emanating from any Special Committee on Race and Insurance work streams related to life insurance and health insurance, respectively.

We look forward to continued dialogue on the development of the Special Committee charges and appreciate regulators consideration of our comments.

**American Council of Life Insurers** | 101 Constitution Ave, NW, Suite 700 | Washington, DC 20001-2133

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The American Council of Life Insurers (ACLI) is the leading trade association driving public policy and advocacy on behalf of the life insurance industry. 90 million American families rely on the life insurance industry for financial protection and retirement security. ACLI’s member companies are dedicated to protecting consumers’ financial wellbeing through life insurance, annuities, retirement plans, long-term care insurance, disability income insurance, reinsurance, and dental, vision and other supplemental benefits. ACLI’s 280 member companies represent 94 percent of industry assets in the United States.

Sincerely,

*Paul A. Dunham III*

cc: Andrew J. Beal, NAIC  
Michael F. Consedine, NAIC  
Kay Noonan, NAIC