



May 13, 2021

Commissioner David Altmaier, Co-Chair
Director Dean Cameron, Co-Chair
NAIC Special Committee on Race and Insurance
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500 Kansas City, MO 6410

Via email to: Kay Noonan, KNoonan@NAIC.org

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

Dear Commissioner Altmaier and Director Cameron:

Thank you for allowing the National Association of Insurance and Financial Advisors (NAIFA) to comment on the proposed charges for the Special Committee (EX) on Race and Insurance. Founded in 1890, NAIFA represents the interests of insurance and financial services professionals across the country. A key component of NAIFA's mission is to serve as an industry expert on diversity, equity, and inclusion (DEI) by attracting and nurturing members from diverse backgrounds. NAIFA remains committed to this mission and has recently undertaken several leading diversity, equity, and inclusion initiatives:

- Creating a Diversity, Equity, and Inclusion Council, which provides guidance, advice, and support to diversity initiatives that will in turn create the cultural shifts as outlined in NAIFA's 2025 Strategic Plan.
- Hosting diversity symposiums and webinars that discuss the hard issues, such as barriers to minority advisors' success, and how our members can be part of the solution.
- Developing a NAIFA Diversity Champion Award, which recognizes the exceptional efforts of NAIFA members who seek to promote the full and equal participation of diverse people in the insurance and financial services industry.
- Developing position papers and research reports featuring thought leadership on recruiting minority advisors and providing helpful and culturally sensitive strategies or selling to diverse markets.
- Creating a DEI-focused, consumer-facing website that provides tools and resources that help financial advisors reach and serve underserved and minority communities.



NAIFA continues to make these initiatives a top priority both internally and externally. We strive to help financial professionals promote and advance diversity and inclusion programs within their organizations. NAIFA greatly appreciates being able to continue to work with the Committee on all charges as a part of our commitment. We are particularly encouraged to work with the committee on the following charges:

- *Charge H.1. to continue research and analysis related to insurance access and affordability issues, including: the marketing, distribution, and access to life insurance products in minority communities, including the role that financial literacy plays.*
 - We see opportunities to address these issues by removing the barriers that stand in the way for minorities to enter the producer workforce. We must work with managers, recruiters, and executives to hire, develop, and promote candidates from all backgrounds. The insurance industry should look like the marketplace it represents, which is a diverse one. We know that typically underserved communities are more receptive to agents and advisors who come from similar backgrounds and can relate to and understand their life circumstances.

- *H.7. to make referrals for the development of consumer education and outreach materials as appropriate.*
 - We strongly support the notion of financial security for all and understand that the expansion of financial education and literacy are critical. Insurance agents and producers play an enormous role in educating consumers. NAIFA is developing tools to encourage its members to take into their communities and help connect the importance of insurance and financial security. We look forward to contributing our insights and expertise to this effort.

- *I.2., the availability of producer licensing exams in foreign languages, steps exam vendors have taken to mitigate cultural bias, and the number and locations of producers by company compared to demographics in the same area.*
 - NAIFA has recommended to expand on this charge by addressing the need for access to producer licensing education and exams in languages other than English. We feel this is an important component to increasing diversity among producers and encouraging a workforce to serve diverse consumers and communities.



Again, we fully appreciate the opportunity to comment on the proposed charges and continue working with the Committee on these important issues. We hope that the Committee will strive for an open and transparent process as we continue to collaborate on this most important issue.

Sincerely,

A handwritten signature in black ink that reads "Maeghan Gale". The signature is written in a cursive style with a large, prominent "M" and "G".

Maeghan Gale
NAIFA Policy Director