



May 14, 2021

Via email at knoonan@naic.org to
Kay Noonan, General Counsel

Commissioner David Altmaier, Florida
Director Dean Cameron, Idaho
Co-Chairs, Special Committee on Race and Insurance

National Association of Insurance Commissioners
444 N. Capitol Street, NW, Suite 700
Washington, DC 20001

Re: Request for Comments on Proposed Charges of Special Committee on Race and
Insurance

Dear Commissioner Altmaier and Director Cameron:

On behalf of the National Association of Professional Insurance Agents (PIA)¹, thank you for the opportunity to provide feedback on the proposed 2021 charges of the Special Committee on Race and Insurance of the National Association of Insurance Commissioners (NAIC) and those charges that are being proposed for referral to other relevant committees.

First, we would like to thank the NAIC for addressing this important and complex issue. PIA repudiates all forms of racism and discrimination and prides itself on respecting the dignity of every individual. To that end, PIA believes that the proposed 2021 charges of the Special Committee on Racism and Insurance, along with those charges that are being proposed for referral to other relevant committees (hereinafter referred to collectively as “the proposed 2021 charges”), will advance our shared values of fairness, respect, integrity, and honesty. PIA supports efforts to bolster diversity and inclusion in insurance and would be pleased, where appropriate, to work with the NAIC, regulators, and our fellow interested parties to implement the proposed 2021 charges.

¹ PIA is a national trade association founded in 1931 that represents member insurance agents in all 50 states, Puerto Rico, Guam, and the District of Columbia. PIA members are small business owners and insurance professionals who can be found across America.

Specifically, PIA supports and intends to contribute to the execution of the Special Committee's charges to:

- Increase access to insurance products,
- Improve the level of diversity and inclusion in the insurance industry,
- Increase the availability of producer licensing exams in foreign languages (Workstream Three), and
- Examine the number and location of agents and brokers compared to demographics in a particular geographic area (Workstream Three).

We also want to draw the Special Committee's attention to an inadvertent omission in the new charge provided to the Market Regulation and Consumer Affairs (D) Committee. That charge states, "The Producer Licensing (D) Task Force will receive a report from [] on the availability of producer licensing exams ..." We ask that the Special Committee identify the source of this important report before finalizing this crucial charge.

PIA appreciates the collaborative spirit with which the NAIC pursues this vital work and its commitment to consideration of stakeholder feedback, and we value our relationships with the NAIC and state insurance regulators all over the country. As members of the business community at large and the insurance industry specifically, it is our communal responsibility to make our neighborhoods, towns, and cities better places for all of us to live and work. Together with the NAIC, regulators, and our industry peers, we look forward to meeting this challenge.

PIA recognizes and appreciates the Special Committee's essential role in strengthening the future of the insurance industry by identifying and counteracting longstanding injustices. As always, we are grateful for the opportunity to provide the independent agent perspective. Please contact me at laurenpa@pianet.org or (202) 431-1414 with any questions or concerns. Thank you for your time and consideration.

Sincerely,



Lauren G. Pachman
Counsel and Director of Regulatory Affairs
National Association of Professional Insurance Agents