



August 28, 2025

The Honorable French Hill
Chairman
House Financial Services Committee
1533 Longworth House Office Bldg.
Washington DC 20515

The Honorable Andy Barr
Chairman
House Financial Institutions and Monetary Policy Subcommittee
United States Representative
2430 Rayburn House Office Bldg.
Washington, DC 20515

**Re: House Financial Services Committee Questions on Title V, Subtitle A of the
Gramm-Leach-Bliley Act (GLBA)**

Dear Chairman Hill and Chairman Barr:

We write on behalf of state insurance regulators and the National Association of Insurance Commissioners (NAIC)¹—which represents the chief insurance regulators in the 50 states, the District of Columbia, and the 5 U.S. territories—in response to the House Financial Services Committee’s request for feedback on current federal consumer financial data privacy laws and potential legislative proposals.² As we consider the Committee’s request and the broader implications of potential legislative

¹ As part of our state-based system of insurance regulation in the United States, the NAIC provides expertise, data, and analysis for insurance commissioners to effectively regulate the industry and protect consumers. The U.S. standard setting organization is governed by the chief insurance regulators from the 50 states, the District of Columbia and five U.S. territories. Through the NAIC, state insurance regulators establish standards and best practices, conduct peer reviews, and coordinate regulatory oversight. NAIC staff supports these efforts and represents the collective views of state regulators domestically and internationally. For more information, visit www.naic.org.

² House Comm. on Financial Services, *House Financial Services Committee Requests Feedback on Current Federal Consumer Financial Data Privacy Law and Potential Legislative Proposals*, Press Release (July 31, 2025), available at <https://financialservices.house.gov/news/documentsingle.aspx?DocumentID=410833>.



changes to GLBA, it is essential to recognize the unique role that state insurance regulators play in safeguarding consumer privacy within the insurance sector.³

In any discussion of modernizing GLBA or considering a “broader approach,” we strongly caution against sweeping federal reforms that could undermine state-level insurance privacy laws and the enforcement of those laws by the states. State insurance regulators have long maintained robust privacy protections through data security, privacy protection, and consumer financial and health information model laws that are tailored to the insurance industry’s unique products and practices. Our approach is comprehensive, effective, and consistent with the Gramm Leach Bliley Act framework. While that legal framework continues to work well, the rules and tools we use continue to evolve to keep pace with innovation, technology, and changing consumer expectations. This includes the GLBA compliant Privacy of Consumer Financial and Health Information Regulation (Model #672)⁴, which every state has adopted, and which state regulators are currently in the process of modernizing to reflect technological advancements and the proliferation of data collection in the digital era. Crucially, any federal approach should preserve state authority and allow for tailored protections in the insurance sector by the regulators who are on the ground protecting consumers and interacting with insurance companies day in and day out.

State insurance regulators have long been committed to ensuring that policyholders’ information is protected from unauthorized use and disclosure and periodically make changes to relevant laws and regulations to keep pace with evolving technology. All states have adopted the NAIC’s Privacy of Consumer Financial and Health Information Regulation, which was drafted in response to Gramm-Leach-Bliley Act (GLBA) requirements. This regulation mandates insurers inform consumers about their privacy policies, outlines the circumstances in which a licensee can disclose private health and financial data to affiliates and third parties, and offers individuals ways to prevent a licensee from sharing that information. In addition, the NAIC’s Insurance Information and Privacy Protection Model Act⁵ establishes standards for the collection, use, and

³ Nat’l Ass’n of Ins. Comm’rs, *Data Privacy and Insurance*, <https://content.naic.org/insurance-topics/data-privacy-and-insurance> (last visited Aug. 25, 2025).

⁴ Nat’l Ass’n of Ins. Comm’rs, *Insurance Data Security Model Law (#672)*, https://content.naic.org/model-laws?combine=672&field_ml_category_target_id=All (last visited Aug. 25, 2025).

⁵ Nat’l Ass’n of Ins. Comm’rs, *Insurance Information and Privacy Protection Model Act (#670)*, https://content.naic.org/model-laws?combine=+Insurance+Information+and+Privacy+Protection+Model+Act&field_ml_category_target_id=All (last visited Aug. 25, 2025).



disclosure of information gathered in connection with insurance transactions. The NAIC's Privacy Protections Working Group is currently reviewing both models for potential updates.⁶

Additionally, all states also have data security standards that comply with GLBA. To keep pace with evolving cyber risks, the NAIC adopted the Insurance Data Security Model Law in 2017.⁷ States are adopting this law, which updates requirements for data security, cyber event investigations, and notification to regulators.⁸ The NAIC also continues to update examination guidance to help insurers address cybersecurity risks and respond to breaches. Additionally, regulators collaborate with the U.S. Department of Treasury to conduct tabletop exercises with insurers to improve cyber incident response and recovery.

Together, these initiatives reflect a comprehensive and proactive approach by state insurance regulators to safeguard consumer data and respond effectively to evolving cybersecurity threats. From adopting insurance industry specific data privacy and security model laws, to enhancing examination protocols and coordinating with federal partners, regulators are committed to maintaining strong, adaptable consumer protections that reflect the unique needs of the insurance sector. These efforts reinforce the importance of preserving state authority in any federal legislative framework addressing data privacy and security.

Thank you for your attention to this important matter.

Best regards,

⁶ Nat'l Ass'n of Ins. Comm'rs, *Privacy Protections (H) Working Group*, <https://content.naic.org/committees/h/privacy-protections-wg> (last visited Aug. 25, 2025).

⁷ Nat'l Ass'n of Ins. Comm'rs, *Insurance Data Security Model Law (Model No. 668)*, https://content.naic.org/model-laws?combine=668&field_ml_category_target_id=All (last visited Aug. 25, 2025).

⁸ Nat'l Ass'n of Ins. Comm'rs, *Insurance Data Security Model Law (#668): Government Affairs Brief (May 2025)*, <https://content.naic.org/sites/default/files/government-affairs-brief-data-security-model-law.pdf>.



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