

April 17, 2025

Sent via email to HMarsh@naic.org

Market Conduct Annual Statement Blanks (D) Working Group

Dear Chair Joshua Guillory,

ACLI appreciates the opportunity to provide comments on the Other Health MCAS to the Market Conduct Annual Statement Blanks (D) Working Group. We hope that our feedback will aid in the development of useful improvements to the MCAS process for future responses.

ACLI would like to understand the regulators' intent around gathering information concerning closed blocks of business and whether this information is useful in MCAS analyses. For companies, gathering information on closed blocks of business can be time-consuming and does not provide insight into the current market landscape and performance of the active business being marketed. We recommend excluding closed blocks of business from reporting in order to streamline the process, enhance data quality, and improve efficiency of regulatory oversight.

Similarly, we would like to understand whether regulators are finding the data on employer groups useful. Our understanding from previous discussions is that the concerns with the marketing of these products are more related to the individual and association markets than employer groups. For the same reasons we recommend excluding closed blocks of business, we also recommend excluding employer group data in order to streamline the process and enhance data quality.

Thank you for your time and attention in considering these matters and for the opportunity to provide comments on this important revision process. The industry stands ready to answer any questions that may arise during discussion.

Sincerely,

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