



April 29, 2026

Mr. Joshua Guillory, Chair
Market Conduct Annual Statement Blanks (D) Working Group
National Association of Insurance Commissioners
1100 Walnut Street, Suite 1500
Kansas City, MO 64106

Via email: [Hal Marsh](#)

Re: Exposure of Long-Term Care Market Conduct Annual Statement Draft Blank – 04/14/26

Dear Mr. Guillory:

On behalf of the American Council of Life Insurers (ACLI),¹ and America's Health Insurance Plans AHIP,² we appreciate the opportunity to comment on [Long Term Care Market Conduct Annual Statement Draft Blank – 04/14/26](#) (LTC MCAS Draft Blank – 04/14/26).

During the Working Group's April 9 call, our organizations summarized comments provided in a joint-trades letter dated February 27, 2026. As a new draft was exposed for comment on the Working Group's home page following the meeting, we wanted to provide further comments. We appreciate the work done to date by the Working Group and NAIC staff to discuss and introduce potential changes and additions to the LTC MCAS Annual Statement reporting. We would like to provide the following comments on LTC MCAS Draft Blank – 04/14/26:

- LTC Interrogatories, Lines 16-21: The new questions proposed in Lines 16-21 appear to be a combination of the questions currently posed in Lines 4-9 and Lines 10-15? We would recommend that with the addition of Lines 16-21, existing Lines 4-15 be removed.

¹ The American Council of Life Insurers 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 275 member companies represent 93 percent of industry assets in the United States.

² AHIP is the national association whose members provide health care coverage, services, and solutions to hundreds of millions of Americans every day. We are committed to market-based solutions and public-private partnerships that make health care better and to help create a space where coverage is more affordable and accessible for everyone.

- LTC General Information, Lines 30-31: We recommend removing the lines requesting direct premium information as these are of limited value and redundant to current reporting. In many cases, premiums for the LTC portions of Life and Annuity Hybrid products are not broken out separately are not available. Premiums for the entire combined product would be of limited value due to varying products designs and premium paying periods. We believe the number of inforce policies is most useful for measuring the size of the companies' LTC business. In addition, LTC premiums by state are currently reported to the NAIC via other reports such as the State Pages of the Annual Statement and Form 5 of the LTC Experience Exhibit, so in order to avoid redundant reporting, these should not be added to MCAS.
- LTC General Information, Lines 41-43: We suggest that Line 42 be switched with Line 43, and also be re-worded to 'Number of polices terminated or cancelled by insurer for reasons other than non-payment or cancelled at the request of the insured.' This will allow for lapsed policies (Line 40) to be placed into one of Lines 41, 42 or 43 based upon the lapse circumstances.
- LTC General Information, Lines 52-56: We would request that these items not be added to MCAS reporting. These data items can be onerous to measure/collect and may require significant system alterations. In addition, we believe these items might be more appropriate for Market Conduct exams or follow-ups. However, if these items are to be added to MCAS reporting, we kindly request clarifying language, such as, is the data being requested on all complaints, complaints related to claims, and/or benefit appeals?

Our understanding is that these proposed changes in the MCAS Annual Statement are intended to be effective for calendar year 2027 data which is reported by April 30, 2028.

Please let us know if there are any questions regarding the above comments. We are committed to working with the Working Group to create a final product that provides states with meaningful and useful LTC data for Market Conduct reviews.

Thank you for the opportunity to provide these comments.

Sincerely,



Kirsten Wolfford
Senior Counsel, ACLI



Amanda Herrington
Executive Director, AHIP