



August 15, 2025

Petra Wallace
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VIA Electronic Mail: pwallace@naic.org

RE: Draft Chapter 21A-Conducting the Property and Casualty Travel Insurance Examination
July 17, 2025 Draft

Dear Ms. Wallace:

The American Property Casualty Insurance Association (APCIA)¹ appreciates the opportunity to provide additional comments on Draft Chapter 21A – Conducting the Property and Casualty Travel Insurance Examination (July 17, 2025 Draft) (“Draft”). We very much appreciate the consideration given to our March 12, 2025 letter and the changes that were made as a result. APCIA does have some remaining concerns with the latest Draft.

Standard 1 – Marketing and Sales

The Review Procedures and Criteria address “unlawful rebate[s].” As stated in APCIA’s March 12, 2025 letter, this is not addressed in the Model Act and should be removed. The Draft states, “Indicate that the travel protection plan being marketed is insurance.” APCIA’s concerns with the statement remain as the language creates a discrepancy as the definition of a travel protection plan per the Act includes non-insurance benefits, travel assistance services and waivers as is acknowledged in the next standard, Standard 2.

Standard 4 – Marketing and Sales

As we asserted in our March 12, 2025 letter, this standard relates to the section of the Model Act (Section 4(B)(2)) that requires that “[t]he limited lines travel insurance producer shall also certify that the travel retailer registered complies with 18 U.S.C. § 1033.” Documents to be Reviewed include “Travel insurer and department of insurance producer licensing records.” Per the Model Act, it is the limited lines travel insurance producer who will certify that the travel retailer registered complies with 18 USC §1033. It is the limited lines travel insurance producer who will maintain the 1033 certification.

¹ The American Property Casualty Insurance Association (APCIA) is the primary national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members represent all sizes, structures, and regions-protecting families, communities, and businesses in the U.S. and across the globe.



Under Review Procedures and Criteria, APCIA again suggests deleting all but the first paragraph – “Examiners should request information from the travel insurer or limited lines travel insurance producer that is sufficient to determine compliance with this standard.” Review of insurer records, again, will not provide information germane to this standard as it is the limited lines travel insurance producer who certifies that travel retailers comply with 18 USC §1033.

Thank you again for the opportunity to provide additional comments. If you have any questions or would like to discuss any of our comments further, please let us know.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lisa Brown", followed by a horizontal line.

Lisa Brown
Assistant Vice President, Market Conduct and Counsel