

Accelerated Underwriting Draft FAQ's  
Comments from ACLI  
Received April 24, 2024

Thank you for providing the Accelerated Underwriting FAQs and allowing the SME Group to provide comments. There were a few points in the FAQ document where we had some comments.

- **FAQ 1: Why is the term "big data" not included in the MCAS definition of Accelerated Underwriting?**
  - Our understanding was that this was removed for vagueness because consistency is really key to MCAS and "big data" was an undefined term. Additionally, the FAQ as drafted conflates "big data" and "automation." The illustration under FAQ 1 would fit better under FAQ 2 because it explains what constitutes accelerated underwriting for the purposes of this MCAS.
- **FAQ 2: How would the company determine if its processes are considered accelerated underwriting?**
  - As written, there is a concern that this would exclude logic rules with deterministic outcomes as this would require binary outcomes. Rules can generate multiple possible decisions using multiple simultaneous inputs and still be deterministic.
- **FAQ 4: How is "predictive modeling" defined?**
  - Can you provide a description of tools/processes instead of just the data elements? As currently written, it is somewhat hard to decipher which tools would be considered under predictive modeling.

Happy to explain further if there is any confusion and thank you again for allowing us the opportunity to comment.

Thanks,

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