

March 19, 2025

Mr. Joshua Guillory, Chair
NAIC Market Conduct Annual Statement Blanks (D) Working Group
National Association of Insurance Commissioner
110 Walnut Street, Suite 1500
Kansas City, MO 64106-2197

Attn: Teresa Cooper, Sr. Market Analysis Manager

By email: tcooper@naic.org

RE: Comments to Market Conduct Annual Statement Blanks (D) Working Group (MCAS WG)
Lender Placed Insurance (LPI) Definitions and Additional Data Elements Changes

Dear Chair Guillory,

Consumer Credit Industry Association (CCIA) and American Property and Casualty Insurance Association (APCIA) thank you for opportunity to comment to the proposed MCAS Working Group LPI MCAS definition and additional data elements changes exposed during the MCA Working Group's March 6, 2025, meeting.

We would welcome further dialogue with the Working Group to understand the necessity for these changes related to reporting "renewals" for LPI placements where none has existed before. We support data changes helpful for regulation, but their need should be compelling considering anticipated additional costs for time and efforts to generate the changes for reporting insurers as well as other parties providing data elements to the insurer.

The LPI blanks report currently includes 20 data elements identifying numbers of in-force, written and cancelled policies or certificates. Additionally, segmenting "renewals" of placed coverage does not seem particularly helpful to measure compliance by insurers or to protect insureds and claimants. Whether a LPI certificate or policy was cancelled or expired during a reporting year, which the proposed "renewal" data elements allegedly intend to identify, may be understood differently by reporting parties and a distinction without a difference for MCAS purposes.

We look forward to further discussions with the Working Group regarding the utility of and necessity for the proposed LPI definition and data element changes.

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