



CRUM & FORSTER®

A FAIRFAX COMPANY

April 3, 2026

MCAS Working Group

Re: Comments Regarding Other Health MCAS and Accident Only Insurance

Dear Working Group Members:

Crum & Forster is writing to ask for guidance or clarification regarding the data field of the Other Health MCAS blank specific to Occupational Accident Only Insurance.

Our position is that Accident Only Insurance for purposes of this MCAS excludes Occupational Accident Insurance that is offered through different distribution methods to cover Independent Contractors such as drivers in the GIG economy and therefore behaves more like Workers Compensation insurance for persons not eligible for WC insurance due to their non-employee status.

We hear that some carriers were advised that although accident only, due to the fact that this is often viewed as a substitute for workers comp-type coverage it is exempt from the Other Health MCAS. Other carriers were advised differently. Therefore, there is the potential for inconsistent reporting of data among carriers.

- The Other Health MCAS defines Accident Only as Individual, Association (purchased through an Association or Trust) or Employer Group.
- Association/Trust is defined as a non-employer group that offers benefits to its members (does not include banks or credit unions). This definition is not consistent with the definition of an Eligible Group and can potentially apply to any other group that is not an employer which we do not believe is the intent of this MCAS report.
- The Other Health MCAS excludes Med Supp, Blanket coverage, and Government Plans.

We would like to ask for confirmation that this can be exempted from the definition of Accident Only for purposes of the MCAS report so all carriers are reporting consistently and for the Exclusions to be amended to exclude Occupational Accident, as the Other Health MCAS blank does not address this type of Accident Only insurance.

Please let us know if you have any questions or we can provide any additional information.

Very truly yours,

Caren Alvarado, VP Regulatory Affairs & Compliance

Crum & Forster A&H Division

732.676.9819 caren.alvarado@cfins.com