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August 31, 2023
Erica Weyhenmeyer
Chair, Market Conduct Annual Statement Blanks (D) Working Group
NAIC

Rebecca Rebholz
Vice Chair, Market Conduct Annual Statement Blanks (D) Working Group
NAIC

Re: Consideration of the Removal of Duplicative Data Elements in the Other Health MCAS

Dear Ms. Weyhenmeyer & Ms. Rebholz:

Thank you for the opportunity to comment on the request to remove duplicative data elements from the Other Health MCAS. We are writing in support of the request to remove elements 54 and 58. It is unnecessary for the duplicative data elements to remain in the Blank. ACLI and AHIP encourage the removal of 54 and 58 prior to the first year of reporting to avoid any confusion. It is likely that NAIC staff would have to answer questions related to the duplicative elements, even with an explanatory note. Rather than considering this again and potentially revising the Blank in the future, we suggest removing the duplicative elements now to be consistent going forward. Additionally, this will save some time for regulators analyzing the data and for companies reporting the data.

We appreciate your time and consideration. We would be glad to answer any questions or discuss further.

Sincerely,



Rikki Pelta

Samantha Burns
Samantha Burns

The American Council of Life Insurers (ACLI) 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 280 member companies represent 94 percent of industry assets in the United States.

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 making health care better and coverage more affordable and accessible for everyone. We believe that when people get covered and get and stay healthy, we all do better. The best way to do that is to expand on the market-based solutions and public-private partnerships that are proven successes.