



Electronically Submitted to jcook@naic.org

May 18, 2026

To: NAIC Life Insurance and Annuity Illustrations Working Group (the “Working Group”)

Re: Short-Term Solutions for Annuity Illustrations (4/1/26 Exposure Question)

On behalf of our members, the Insured Retirement Institute (IRI)¹ appreciates the opportunity to provide input to the Working Group on the exposure question shared with stakeholders on April 1, 2026.

IRI has reviewed the comments submitted by the **American Council of Life Insurers (ACLI)** and supports ACLI’s recommendations. We believe ACLI’s letter appropriately identifies key issues and offers a practical path forward.

In particular, IRI supports ACLI’s comments regarding the use of Model #245 as the foundation for near-term changes, the development of shorter and more summary-based illustrations, and clearer, more standardized disclosures around non-guaranteed elements. These recommendations would help improve clarity, support workable implementation, and advance the shared goal of strong consumer protections.

Thank you for the opportunity to provide these comments. We appreciate your consideration and would be happy to discuss further.

Sincerely,

Sarah E. Wood

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¹ The Insured Retirement Institute (IRI) is the leading association for the entire supply chain of insured retirement strategies, including life insurers, asset managers, and distributors such as broker-dealers, banks and marketing organizations. IRI members account for more than 95 percent of annuity assets in the U.S., include the top 10 distributors of annuities ranked by assets under management, and are represented by financial professionals serving millions of Americans. IRI champions retirement security for all through leadership in advocacy, awareness, research, and the advancement of digital solutions within a collaborative industry community.