



Division of Insurance Market Regulation

April 17, 2025

Sent via email: hmarsh@naic.org

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

Dear Chair Guillory:

Thank you very much for the opportunity to comment on the wording of the complaint data elements contained in the various Market Conduct Annual Statement (MCAS) blanks.

Missouri favors using consistent definitions and terminology for common data elements across multiple MCAS blanks. The collection of complaint data is one such area.

As such, we would support updating the blanks to use the following verbiage as it relates to complaints, not coming directly from the department:

Number of complaints received directly from any person or entity other than the DOI.

We aim to collect data on any complaints received directly by the company from parties other than the department, regardless of their source. We believe the language suggested above clearly specifies the type of data we want to gather, eliminating any confusion regarding potential discrepancies caused by varying terms across different statement types. Based on our review of the information presented during the last meeting of the Working Group, we believe changes would be needed to the following statement types:

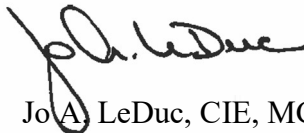
- Disability Income
- Long-term Care
- Other Health
- Short-term Limited Duration



Missouri also advocates eliminating the requirement for companies to report the number of complaints received directly from the department on all MCAS statement blanks. This in-house data should be easily accessible to regulators. The standardized coding structure includes first and/or second-level coverage codes related to blanks where this information is currently included. These codes help regulators identify complaints filed with the department for specific lines of business. Therefore, we believe it is unnecessary for individual companies to report this information on the MCAS.

Thank you once again for the opportunity to comment on this topic. Please feel free to reach out if you have any questions about our feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "Jo A. LeDuc". The signature is fluid and cursive, with a large initial "J" and "L".

Jo A. LeDuc, CIE, MCM, CPCU, FLMI, AIDA
Director, Insurance Market Regulation Division