



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 proposed changes to the Lender-Placed Market Conduct Annual Statement (MCAS) blank.

To promote more consistent reporting by companies, Missouri supports the proposed revision to the definition of "Cancellations" and the addition of a definition for "Term of Coverage Completed." We also recognize the value of including data elements that require reporting the number of certificates or individual policies for which the coverage term was "completed" during the review period. This would provide a clearer picture of the total number of certificates or individual policies for which coverage ended during that time.

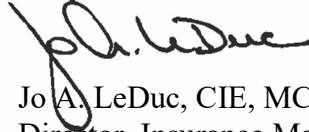
We have some concerns about the remaining proposed definitions and data elements. Specifically, the definitions for "Individual Policies Written During the Period" and "Certifications Written During the Period" include both certificates and individual policies. Additionally, the proposal introduces new data elements for reporting certificates and individual policies that have been "renewed." We do not support adding definitions that could lead to double reporting of information.

We are also struggling to understand how insurance regulators would benefit from having the number of certificates or individual policies that were 'renewed' during the period reported separately from the number of certificates or individual policies written during that same period. We would appreciate further discussion and additional time to consider what insights into insurer practices we could gain by including these two elements and their related definitions.



Again, thank you for the opportunity to provide comments on this topic. We look forward to future opportunities to continue this important dialogue.

Sincerely,

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

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