

December 15, 2025

Joshua Guillory (LA), Chair
Market Conduct Annual Statement Blanks (D) Working Group
c/o Hal Marsh, Market Analyst II
Via email hmarsh@naic.org

Re: Required to File (RTF) Options Request for Feedback

Dear Chair Guillory and Members of the Working Group,

On behalf of our members, the National Association of Mutual Insurance Companies (NAMIC) would like to thank the NAIC Market Conduct Annual Statement Blanks (D) Working Group for requesting and accepting comments on the options for achieving compliance and accuracy to the required to file procedures for filing MCAS.

SUBSTANTIVE FEEDBACK

NAMIC supports maintaining the current process (Option 3), as it represents the most efficient and appropriate approach without introducing unnecessary complexity or additional resource demands. The company further supports the continued use of the financial statement exhibit as the primary reporting mechanism for this process.

This approach has proven effective in reducing the number of waivers required for non-reportable premium while minimizing administrative effort for both insurers and state regulators. As part of its standard practice, members have noted they conduct a thorough review of RTF submissions by schedule and legal entity.

While NAMIC supports continued reliance on this process, it acknowledges the ongoing need for an appropriate governance structure administered by the NAIC and/or state departments of insurance. Such oversight will help ensure that all reporting entities complete the exhibit accurately and consistently in accordance with regulatory expectations.

Thank you,



Erica Weyhenmeyer, CPCU, MCM, AIE, WCP
Policy Vice President- Market Regulation & Workers' Compensation
National Association of Mutual Insurance Companies (NAMIC)