

October 10, 2025

Sent via email

**To:** Marsh, Hal; Guillory, Joshua

**Cc:** Quinlan, Shane

**Subject:** NC comments regarding the MCAS Required to File process

**NC comments regarding the MCAS RTF process**

- The recent change to the MCAS required to file process excludes states from the waiver determination process as the industry determines if they are required to file and responds accordingly in the Financial Annual Statement.
- For each state to determine if all companies which meet filing requirements submit a filing, there is now a significant amount of additional work that needs to be completed. For example, the data needs to be queried to identify filings that should have been made but weren't and follow up communication is then required.
- The MCAS data is a valuable source of information which is exemplified by the time that has recently been spent revising its definitions. Therefore, it is imperative that all companies that meet the reporting requirements are flagged as required to file so we receive the data. NC prefers this to be based on reported premium as it was previously.
- Ms. Cooper mentioned during the last call that MCAS will now use "FDR." NC would like more information regarding this. Does "FDR" refer to the Financial Data Repository? Can further information be provided as to the reason for this change, and a description of its impact on the MCAS data availability?

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