

October 7, 2025

Sent via email

**To:** Marsh, Hal

**Cc:** Cooper, Teresa

**Subject:** Oregon comments for MCAS Blank WG regarding identification and tracking of companies required to report

Good morning,

Here are Oregon's comments regarding the identification and tracking of insurers required to report for MCAS.

We appreciate the efforts to find more precise ways to identify and track insurers required to report. Unfortunately, we have run into situations where insurers have not submitted the MCAS Premium Exhibit form, or it was submitted filled out incorrectly. This resulted in some insurers not being included in MCAS reporting expectations when they should have been and others still needing to request exemptions.

If the current process remains, Oregon will have to implement its own review and outreach process to confirm all insurers that should report are doing so while still reviewing NAIC tracking of exemption and extension requests. This would also require Oregon to communicate these edits and request the NAIC tracking system be updated.

Oregon's preference would be returning to an approach where the NAIC and states identify the insurers we believe must report and let them submit exemption requests as needed. This approach provides more confidence that all insurers required to report are receiving necessary communications and are expected to report. For Oregon, insurers we expect to be included, and are not, will still need to submit information to us explaining why they are exempt. If other states do the same, insurers will now have multiple correspondence to manage instead of a centralized location through the NAIC where exemptions could be submitted.

Thanks,

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