

**From:** [October Nickel](#)  
**To:** [Cooper, Teresa](#); [Rebholz, Rebecca](#); [Smith, Tressa](#)  
**Subject:** RE: ACLI Comment Letter re Accelerated Underwriting/TPAs  
**Date:** Monday, August 24, 2020 10:52:56 AM

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In Response to ACLI:

Accelerated Underwriting (AU):

1. Accelerated Underwriting is a blanket term, and would be utilized by regulators to determine key concerns, not specifically with the elements that comprise accelerated underwriting such as: “credit score/financial worthiness” “big data” “analytics” and other proprietary information, this would be similar to having a carrier identify “cash value” or “non-cash value” products – the request is generalized for that reason to segregate a product marketing type, offering, underwriting element, even key claims payment concerns – these are essential to the scope of the market conduct review, and practical for regulators to find this data worthy of inclusion on a general level – outside of the Accelerated Underwriting working group and their mission.
2. ACLI states they fail to see the usefulness of this blanket information at this time – usefulness would be: 1. Claims closed without payment – policy’s applied for and not issued, misrepresentation, number of recessions, contested health determinations, adverse underwriting determinations – (both front end and back end during claims), marketing violations .. etc.
3. I agree that it is a growing industry standard practice – which confirms the need to identify these products in the market analysis process. Adding AU now – as a question to if the carrier uses AU – is not premature given the current usage of AU by industry, also MCAS changes being proposed now will be reflected two years from now, making the adoption of the change timely.

TPA/MGA’S:

1. Although insurers are “responsible” for TPA/MGA’S actions, this does not mean that the TPA/MGA is acting in its capacity granted by a state or as authorized and within the knowledge of the carrier. Many Regulators on this call have experienced this I am sure.
2. MCAS filing data is considered proprietary for state use. ACLI contends that this would violate some level of confidentiality, I would be interested in hearing how this addition would do so in MCAS. Perhaps you can provide a written response to Tressa/Teresa and they can forward to me as I am not available to be on this call. I would be interested in working on a possible solution to this issue if known and shared by ACLI.

Thank you,

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