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Commissioner Bruce R. Rame  
Chair, NAIC Market Conduct Examination Standards (D) Working Group  
Nebraska Department of Insurance  
1135 M Street  
Lincoln, NE 68508-3639

Dear Chair Rame:

On behalf of the U.S. Travel Insurance Association (“USTiA”), thank you for the opportunity to provide comments on the National Association of Insurance Commissioners’ (“NAIC”) Market Conduct Examination Standards (D) Working Group (“Working Group”) draft Travel Insurance Examination Standards (“Examination Standards”) dated August 26, 2019,<sup>1</sup> to accompany the new travel insurance model law (“Model Law”).<sup>2</sup> The USTiA appreciates the Working Group’s willingness to incorporate our suggestions into the Examination Standards.

The USTiA remains concerned about one aspect of the review procedures and criteria under the Marketing and Sales Examination Standard 7 and believes the Working Group should amend it to be consistent with the Model Law.

**Standard 7: The Limited Lines Travel Insurance Producer has an adequate training program in place, containing instructions on the types of insurance offered, ethical sales practices, and required consumer disclosures, that is required of each employee and authorized representative of the Travel Retailer whose duties shall including offering and disseminating travel insurance.**

The USTiA appreciates the Working Group’s changes to Standard 7. However, the review procedures and criteria language under Standard 7 goes beyond the Model Law.<sup>3</sup> *The USTiA requests that the Working Group remove the words “specific product(s) or” from the first paragraph of the review procedures and criteria and the words “product-specific” from the fifth paragraph of the review procedures and criteria.*

<sup>1</sup> “Chapter 21A—Conducting the Property and Casualty Travel Insurance Examination,” NAIC (draft August 26, 2019), available at <https://content.naic.org/sites/default/files/inline-files/Travel%20Ins%20Exam%20Stds%208-26-19.pdf> [hereinafter “Examination Standards”].

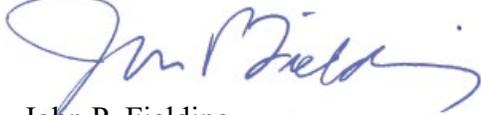
<sup>2</sup> Travel Insurance Model Act (#632), NAIC, available at <https://www.naic.org/store/free/MDL-632.pdf> [hereinafter “Model Law”].

<sup>3</sup> Examination Standards at 15.

UStiA's suggested language avoids any confusion that would arise from the language in the current draft that continues to suggest that every insurer come up with narrowly tailored training for each and every product that is sold. The Model Law intends to require travel insurance-specific training, not to require an insurer to train Travel Retailers on every conceivable iteration of their products that are offered. A travel insurance training module that provides instruction as to the type of insurance offered (travel), ethical sales practices, and required disclosures are intended to educate consumers as stated. Specific details about specific products are not normally included because of the retailer's limited role relative to that of the Limited Lines Travel Insurance Producer.<sup>4</sup>

The UStiA hopes this information is helpful and aids in the Working Group's deliberations. The UStiA looks forward to the opportunity to further discuss these comments with you on the next Working Group call. In the meantime, please contact me if you have any questions.

Sincerely,



John P. Fielding

Counsel, U.S. Travel Insurance Association

cc: Market Conduct Examination Standards (D) Working Group Members

<sup>4</sup> The UStiA also notes that Travel Retailers, while permitted to offer and disseminate products, are not permitted to provide advice about insurance, so providing the Travel Retailer with general information about the product, ethical sales practices, etc. is also preferable to avoid implying that Travel Retailers can engage in acts only permitted for Limited Lines Travel Insurance Producers.