

May 2, 2025

Sent via email

**To:** Marsh, Hal; Cooper, Teresa

**Cc:** Rebholz, Rebecca; OCI DL MR Market Analysis

**Subject:** Comments Discretionary Groups Other Health Blank

To: Market Conduct Annual Statement Blanks (D) Working Group

Wisconsin recommends that companies should not report discretionary groups as defined in each state, because the national comparison would be useless at that point.

Here is an alternative option:

- Exclude all health insurance policies/certificates not considered Associations/Trusts, Individual or Employer Group Products.

In case regulators don't want to do away with the reporting element altogether:

- Create an "Other" bucket where companies report all health insurance policies/certificates not considered Associations/Trusts, Individual or Employer Group Products or Discretionary Groups. (this means we wouldn't really be comparing apples to apples)
- Create a bucket for each "other" type of group by name, i.e. one bucket for labor unions, one for financial institutions, etc.



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