November 13, 2026

Brett Bache, Chair
Danielle Torres, Vice Chair
Market Conduct Examination Guidelines (D) Working Group
National Association of Insurance Commissioners
1100 Walnut Street Kansas City, MO 64106-2197

Submitted via email: pwallace@naic.org

**RE: Comments on the Revisions to the Draft Cybersecurity Event Response Coordination Framework**

Dear Chair Bache and Vice Chair Torres:

The Blue Cross Blue Shield Association (BCBSA) appreciates the opportunity to comment on the revised Cybersecurity Event Response Coordination Framework. We support efforts to streamline reporting and coordination efforts to reduce burdens on these necessary functions. BCBSA previously submitted comments on the July 2026 exposure draft and appreciate NAIC's efforts to incorporate stakeholder feedback into this revised version.

BCBSA is a national federation of independent, community-based and locally operated Blue Cross and Blue Shield companies (Plans) that collectively cover, serve and support 1 in 3 Americans. BCBS Plans contract with 95% of hospitals and 91% of doctors across the country and serve those who are covered through Medicare, Medicaid, an employer, or purchase coverage on their own.

BCBSA supports NAIC’s goal of improving coordination among state insurance regulators during significant cybersecurity events. We also appreciate NAIC’s efforts to ensure a collaborative process where industry can contribute to and comment on this framework. We believe the revised framework reflects meaningful improvements and addresses several concerns raised in our previous comments. In particular, the revisions better define the purpose of the framework, clarify expectations regarding coordination among stakeholders, and recognize the importance of avoiding duplication with existing regulatory requirements. These changes strengthen the framework's usefulness as a resource to support voluntary coordination and information sharing during cybersecurity incidents.


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BCBSA appreciates the Working Group's continued efforts to strengthen the Framework. As NAIC works to finalize the Framework, we respectfully offer the following recommendation to build upon these important improvements:

- **We recommend that NAIC clarify expectations for regulatory coordination, reporting, and engagement for cybersecurity events that originate from third-party service providers and downstream entities.** BCBSA appreciates that the revised Framework now expressly recognizes cybersecurity events involving third-party or affiliated service providers and shared technology dependencies. To build on this recognition, additional clarity would be helpful regarding how the Framework applies when an event originates with a third-party service provider and affects multiple regulated entities, including where additional downstream entities are involved. Greater clarity regarding the roles and responsibilities of regulated entities, third-party service providers, and downstream entities would support a more consistent approach when a single cybersecurity event affects multiple organizations. This clarity in expectations would enable all stakeholders to more effectively manage and address the incident.

BCBSA and BCBS Plans are deeply committed to protecting the privacy and security of members' health information and maintaining the trust of the individuals and communities we serve. We support continued collaboration among regulators, health plans, and other health care stakeholders to strengthen cybersecurity while supporting effective incident response and recovery.

We appreciate the opportunity to provide these comments and look forward to continuing to work with NAIC as the Framework is finalized. If you have any questions, please do not hesitate to contact Randi Chapman at randi.chapman@bcbsa.com.

Sincerely,



Clay S. McClure
Senior Director, State Affairs
Blue Cross Blue Shield Association


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